NATIONAL ELECTRONIC STUDENT CARD

PRIVACY POLICY

OBECTIVE OF THE POLICY

This policy aims to provide transparency regarding the processing of personal data for the purposes of the National Electronic Student Card System (the System), maintained by the National Center for Information and Documentation (NACID).

The System is a module to the Register of all active, interrupted and graduated students and doctoral students (the Register). NACID processes personal data to the extent necessary to exercise its official authority to maintain the Register[1].

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PERSONAL DATA IN THE NATIONAL ELECTRONIC STUDENT CARD (NESC)

The personal data in the electronic card is in accordance with the one-time issuance of NESC and the data minimization principle of Regulation (EU) 2016/679:

- Name and date of birth, used to identify the university student/PhD student as a natural person;

- UAN, which serves to identify him as a student in the field of higher education in the Republic of Bulgaria and to provide an opportunity to check the validity of the card and the student's status.

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[1] Art. 10, par. 2, p. 3, b) of the Higher Education Act

The system grants access to the electronic card to the university/PhD student upon successful activation and log in of his/her account.

PERSONAL DATA IN THE STUDENT'S ACCOUNT IN THE SYSTEM

The data in the account is automatically retrieved from the Register as submitted by the university/scientific organization.

Only the university/PhD student has full access to their account data upon successful activation of their account and log in the System.

The account contains the following categories of personal data:

- Individualizing data about the person (names, UAN, personal identifier, date and place of birth, citizenship and permanent address);

The data is processed only to the extent necessary to identify the student in the database of the Register upon request for account activation from the NESC portal, request for a service, to reflect data changes in the Register, as well as for verification of the information entered in the registration form.

- Contact details (phone number, e-mail)

Data is processed solely for the purposes of communication between the student and NACID/MES, on matters related to the his/her education.

NACID uses the student's e-mail to send the username and activation link for his/her account in NESC.

- Higher education and/or doctoral programs

The data is processed for the purposes of providing the student with electronic access to up-to-date information about his/her education, including the university/scientific organization, specialty/doctoral program, status, unit, form of study, qualification/scientific degree, duration of studies, faculty number, previous education, semester information, scanned image of the diploma for the completed degree.

PERSONAL DATA IN THE RESULT FROM VERIFICATION OF NESC VIA UAN/QR CODE

The verification can be done by any user within their legitimate interests by entering the UAN or scanning the QR code of the electronic student card.

The resulting reference contains the following categories of data:

- Individualizing data about the person (names, EAN and date of birth);

- Information about education (student's specialty, their qualification/academic degree, form of study and university/scientific organization.);

- The current status of the university/PhD student in the Register.

The processing of personal data is kept to a minimum and is necessary as to verify the validity of NESC and the current status of the university/PhD student.

PERSONAL DATA IN THE RESULT FROM INQUIRIES VIA REGIX/WEB API INTERFACE

This type of inquiry is carried out pursuant to Art. 2 of the Electronic Government Act. The aim is for administrative bodies, persons performing public functions and public service providers to access electronically the necessary data for a university/PhD student who exercises a right/obligation before them, that requires proof of his student status.

Access is allowed in accordance with Art. 8, par. 1 of the Ordinance on the general requirements for information systems, registers and electronic administrative services. It states that officials accessing registers and databases use the data only for the purposes and to the extent necessary to exercise their official authority and/or in any other case provided for by law.

PRIVACY RIGHTS OF THE DATA SUBJECT

The data subject has the right to obtain confirmation as to whether or not personal data concerning him or her is being processed and, where that is the case, access to the personal data and certain information regarding the processing.

The data subject has the right to obtain rectification of inaccurate personal data concerning him or her which cannot be rectified by the data subject himself/herself.

The data subject has the right to obtain the erasure of personal data concerning him or her.

The data subject cannot request erasure when the data is processed in fulfillment of a legal obligation (as is the case for the data in the Register, a module of which is NESC), for the performance of a task of public interest, when defense of legal claims or for statistical purposes. Besides there cases the data subject can request erasure when the data is no longer necessary in

relation to the purposes for which it was collected or otherwise processed, as well as in other cases stated in Regulation (EU) 2016/679.

If a user considers the processing of his/her personal data to be unlawful, he/she has the right to submit a complaint to Commission for personal data protection.

If the accuracy of the personal data is contested by the data subject, for a period enabling the controller to verify the accuracy of the personal data, as well as in other situations stated in Regulation (EU) 2016/679, the user has the right to obtain restriction of processing.