

THE PRIVACY POLICY

CHAPTER I

GENERAL PROVISIONS

1. The Description of the Procedure for Using the Vilnius University ALUMNI Information System (hereinafter the 'Description') establishes the rights, duties, and responsibilities of the employees of the controller and the processor of the Vilnius University ALUMNI Information System (hereinafter the 'system') as well as the ones of the system users.
2. Vilnius University is the controller and processor of the system.
3. The Communication and Marketing Division of the Central Administration of Vilnius University implements the functions of the system controller and processor at the University.
4. The system is intended for promotion of interpersonal communication of University's graduates (hereinafter the 'users') and the University's marketing.

CHAPTER II

RIGHTS AND DUTIES OF USERS

5. All users who have registered in the system and confirmed that they have acquainted themselves and agree with this Description shall be able to use the system.
6. The right to use the system is granted only to users whose identity has been confirmed.
7. The users shall have the right to:
 - 7.1. use the services;
 - 7.2. access the user's data processed in the system;
 - 7.3. request to correct inaccurate details and request to forget the information submitted by the graduate themselves;
 - 7.4. refuse all or part of services;
 - 7.5. cancel the consent to process personal data for marketing purposes with no impact to the use of personal data performed before cancelling the consent.
8. The right to be forgotten is restricted for information processed legally by the University on the basis of previous study relationship. Full description of rights and obligations is available on <https://www.vu.lt/en/privacy-policy>.
9. The users must:
 - 9.1. use the provided information resources in good faith without breaching the requirements of legal acts on privacy and information security;

9.1.1. the Rules of Use of the Lithuanian Research and Education Network LITNET approved by Order of the Minister of Education and Science of the Republic of Lithuania No. V-1348 of 18 July 2011 “On the Approval of the Description of the Procedure for the Provision of the Lithuanian Research and Education Network LITNET Services and the Rules of Use of the Lithuanian Research and Education Network LITNET”;

9.1.2. the Description of the Procedure for Processing of Personal Data at Vilnius University, approved by Order of the Rector of Vilnius University No. R-316 of 25 May 2018 “On the Approval of the Description of the Procedure for Processing of Personal Data at Vilnius University.”

9.2. enter only correct and relevant data into the system;

9.3. use the provided information only according to its direct purpose and legitimate aims;

9.4. not to transfer the right to log in to the system and use system services to third parties;

9.5. not to create any preconditions for breaching the interests of the University and its community.

CHAPTER III

THE BASIS AND SCOPE OF DATA PROCESSING

10. The basis for personal data processing in the system (except for data processed for marketing purposes) is a previous study agreement concluded by the user and the University and the rights and duties established in the Republic of Lithuania Law on Higher Education and Research and the Republic of Lithuania Law on Electronic Communications.

11. The Purposes of Processing of Personal Data:

11.1. the following user data is processed for the purpose of communication with community and on the basis of legitimate demand: contact person’s full name, academic and pedagogical titles, scientific degrees, year of graduation, diploma No., academic unit they graduated from, study programme, study form, phone number(s), date of birth, address of residence, email(s), represented company, position, address for correspondence, data on memberships in societies and groups of the University, choices of communication and consents. This data is processed in the system as long as the account is active and is deleted upon the user’s request. Once this data is deleted, the user’s account in the system is also deleted;

11.2. for the purposes of direct marketing, on the basis of legitimate University’s interest, in order to inform the members of the community about the University’s events, services provided, and goods offered (paid University’s academic and other expert services, tickets to paid University’s events, museums, botanical gardens, etc. goods of the University Press, etc.), the following contact details are collected and processed in the system: email, full name, phone number(s), address;

11.3. the following data is processed for administration of accounts and identification, for the purpose of system authentication, and on the basis of user consent: user’s full name, personal identification code, personal phone numbers, personal email, provided user’s name, and

password reminder data. This data is processed in the information system as long as the account is active and is deleted upon the user's request;

11.4. for the purpose of service provision and maintenance and monitoring of electronic communications traffic, on the basis of implementation of legal requirements of the Republic of Lithuania Law on Electronic Communications, actions of users are automatically entered in action logs;

11.5. entries in the log of system actions provide an opportunity to determine the date of an unauthorised log in and/or attempt to log in, the duration of a log in, the name of the user who has logged in and the IP address of the computer from which the log in was carried out and other actions performed. The information on actions of processing electronic information performed by logged-in users (entry, change, update, and deletion of information) is registered;

11.6. action logs are protected from unlawful use, change, distortion, and destruction of the data therein;

11.7. this data may be used for investigating security incidents; the data required for investigation must be stored in the main log of events for at least three months, and as demanded by investigating authorities also in archival copies available for incident investigation for six months;

11.8. On the basis of the requirements of the Republic of Lithuania Law on Electronic Communications, in order to ensure that data is available for the purposes of serious and grave crime as defined in the Penal Code of the Republic of Lithuania, for the purposes of investigation, disclosure, and criminal proceedings, the data indicated in Annex 1 to this law is processed. This data, unless otherwise specified by law enforcement authorities, is processed for six months and is destroyed on expiry of the period.

12. The cookies used in the system:

12.1. to ensure the quality of services and operation of the system, the following cookies are used in the system;

12.2. the system uses both technical cookies developed and directly used by the system (without third-party intervention) for transferring information by the electronic communications network and ensuring the operation of the system and analytical (tracking) cookies. Technical cookies are not used for any other purpose. Such data processing prevents direct or indirect identification of the user. If these cookies are deleted, the system may malfunction;

12.3. in order to track and assess the number of visits to the system as well as to conduct statistical analysis, tracking cookies are transferred to third parties (Google tracking cookies and other cookies are described below);

12.4. a user may delete third-party cookies from their computer or block them by using the Internet browser on their computer. Blocking of these cookies may impair the search function;

12.5. more information about the cookies processed by the University is available on <https://www.vu.lt/en/privacy-policy#cookies>. The list of cookies used in the ALUMNI system:

Name	Description	Moment of creation/Expiry date
;_utma	A tracking cookie from Google Analytics. Information is sent anonymously to the server. The cookies identify unique users and keep track of their sessions.	When one's browser loads the webpage for the first time / 2 years
_utmx	A tracking cookie from Google Analytics is used to track a user's inclusion during an experiment.	When one's browser loads the webpage for the first time / 18 months
_utmxx	A tracking cookie from Google Analytics is used to determine the experiments a certain user has been included in.	When one's browser loads the webpage for the first time / 18 months
_utmz	A tracking cookie from Google Analytics. Information is sent anonymously to the server.	When one's browser loads the webpage for the first time/ until the browser is closed
_gid, _ga	A tracking cookie from Google Analytics is used to distinguish visitors (2 years).	When one's browser loads the webpage for the first time / 2 years
dc_gtm_UA-XXXXX, NID, IDE, DSID	Google cookies which serve to provide personalised offers.	When one's browser loads the webpage for the first time / 2 years
language, _icl_current_language, pll_language	Language cookies are used to identify the preferred language of a webpage.	When one's browser loads the webpage for the first time / 2 years
SimpleSAMLAuthToken, SimpleSAMLSessionIDSSO (SimpleSAMLphp), joomla_user_state cookies	Cookies store information about an active session confirmed by the user (only for registered users).	When one's browser loads the webpage/ until the browser is closed

_pk_id.X.X XXX, _pk_ref.X.X XXX, _pk_ses.X.X XXX	piwik cookies are used to collect statistics on the webpage visitors' behaviour.	When one's browser loads the webpage / 1 year
reDimCookieHint	A cookie identifies whether the user has accepted the privacy policy.	When one's browser loads the webpage/ unlimited
wplc_chat_status	Chat helper cookie.	When one's browser loads the webpage/ until the browser is closed
fr	Facebook cookie intended for advertising. It is used for statistical analysis and repeated redirection on Facebook or other platforms managed by Facebook Advertising.	When one's browser loads the website / 6 months.
_fbp	A Facebook cookie that collects technical data about visitors' behaviour and IP address.	When one's browser loads the website / 1 session.
SYNC, GUID, TradeDouble rGUID	TradeDoubler system cookie. It helps to link the history of user's actions on the website with advertising.	Generated after the user performs specified actions on the website. For example, a subscription to a newsletter / 1 year
lidc	A LinkedIn cookie used for routing.	By clicking share buttons and ad tags / 1 year
bcookie, bscookie	A LinkedIn cookie for (secure) browser identification.	By clicking share buttons and ad tags / 1 year

13. Data for marketing purposes is processed only on the basis of the user's consent.

14. The user confirms their consent for their data to be managed for marketing purposes by placing a tick in the system. If the tick is not placed, the data shall not be processed for marketing purposes.

15. The data provided by the user for marketing purposes shall be stored in the system for a period not exceeding one year from the last log in of the visitor.

16. When the user demands to be forgotten, the personal data processed on the basis of their consent shall be deleted no later than within 30 days.

17. It is considered that the user has read these rules when they tick that they agree with these Rules upon registering in the system for the first time. If the user disagrees with these rules, access to the system is not granted, and no services are provided.

18. The controller of the system provides an opportunity to disagree with the user data being managed on the basis of direct marketing when the user does not place the tick by the consent to process data for marketing purposes in the system. In such case the system controller does not perform data processing for this purpose.

19. The controller of the system stores the data provided by the user in the system for a period not exceeding one year from the last log in of the user in the system.

20. On issues of data protection and implementation of rights of data subjects, the users can contact the Marketing and Communication Division of the Central Administration of Vilnius University or address the Data Protection Officer of Vilnius University by contact details indicated on <https://www.vu.lt/en/privacy-policy#contacts-for-reports-and-enquiries>.

CHAPTER IV

ALUMNI EMAIL

21. For users who express their wish and undertake to follow the requirements of the Description, an Alumni email may be provided for communication with other users.

22. Alumni email is an email service provided for users in the Microsoft 365 environment (Exchange Online (plan 1) for Alumni).

23. The 'Microsoft Ireland Operations Limited' company is the processor of the Alumni email and personal data processed therein.

24. Personal data (full name, email address, personal email address, and a password created by the user as well as the mobile phone number if the two-factor authentication is selected) of users who have selected to use the Alumni mail service is transferred to the processor of Alumni email.

25. The structure of an email address is made from name and surname separated by a full stop and the suffix @alumni.vu.lt. The Lithuanian letters of the full name are replaced with Latin letters. If the full names of several users are the same, an additional digit is added to the surname.

26. The description of the service and its other parameters are published on the University's website <https://santaka.vu.lt/display/DUK/Office+365> (in Lithuanian).

27. The incoming and outgoing emails are verified with antiviral and spam filtering tools.

28. The University shall have a right to block incoming emails from external senders or access to email without notifying the user if their actions are qualified as harmful to the University email service or security of the computer network, are offensive in their nature or otherwise breach the requirements of legal acts, public order, and the rights and dignity of other users.

29. The users shall have a right to refuse to use the service specified in Item 23 of the Description at any time. Once the service is cancelled, the account is deleted within 30 days, data is archived and stored and can be restored only upon demand of the law enforcement authorities.

30. The data in the archive is stored for up to three months and, upon the demand of law enforcement authorities, for the time period established in legal acts.

CHAPTER V

FINAL PROVISIONS

31. The users shall be responsible for the content of submitted data and messages and the possible consequences of their actions.

32. The account is frozen if the system account is not used for a year. The account is reactivated once the password, whose complexity is subject to requirements established in the Administration Rules for Users of Vilnius University Study Information System, approved by Order of the Rector of Vilnius University No. R-254 of 26 June 2015 “On the Approval of the Rules for the Secure Processing of Electronic Information of Vilnius University Study Information System and the Rules for the Administration of Users of Vilnius University Study Information System” (the rules are published on <https://www.vu.lt/teises-aktai#vusis> (in Lithuanian)).

33. The University shall have the right to block access to the system and Alumni email for users who have breached the requirements established in the Description or other requirements of applicable legal acts of the Republic of Lithuania or Vilnius University on information security.

34. Requests and proposals for the system are registered at alumni@vu.lt.

35. System-related incidents are registered by informing the Help Centre of the University at pagalba.vu.lt, by phone (8 5) 236 6200 during working hours and/or by email pagalba@vu.lt.