

**LIMITED LIABILITY COMPANY
"HIGHER EDUCATIONAL ESTABLISHMENT
"AMERICAN UNIVERSITY KYIV"**

Approved by
Resolution of the sole participant
№18/34 dated 12.07.2023

PRIVACY POLICY

PRIVACY POLICY

WHAT IS THE PURPOSE OF THIS DOCUMENT?

LIMITED LIABILITY COMPANY "HIGHER EDUCATIONAL ESTABLISHMENT "AMERICAN UNIVERSITY KYIV", a legal entity registered under the laws of Ukraine, having identification code of legal entity 43634285, registered office at: Ukraine, 04070, Kyiv, Poshtova square, 3 ("AUK", "we") is committed to protecting the privacy and security of your personal information.

This Privacy policy describes how we collect and use personal information about you during and after your application process (online and physical), your educational process and general access to our website www.auk.edu.ua ("AUK website", "our website").

We are transparent about what we do with your personal data to help you understand the implications of how we use your data and the rights you have in relation to your data: we provide you with continuous access to all the information contained in this Privacy policy and which you can consult whenever you deem it necessary; you will also have access to additional information about how we use your data, during further interaction with us.

AUK is the data controller for the data protection purposes. This means that we regulate the processing and protection of your personal data and are responsible for it. We may share your personal information as described in this Privacy policy below. If you have any questions about this Privacy policy or how we handle your personal information, please contact us to dpo@auk.edu.ua.

We are required under data protection legislation to notify you of the information contained in this Privacy policy. It is important that you read this Privacy policy so that you are aware of how and why we use your personal data.

We may update this Privacy policy at any time. Please check it to be aware of the updates.

If you do not agree to the terms of this Privacy policy, please do not provide your personal data to us, do not access or use AUK website.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

We may collect, store, and use the following personal information about you:

Personal information:

- First name, last name;
- E-mail;
- Contact details, phone number, address;
- Date of birth;
- Gender;
- Citizenship/residence permit availability; country of residence/temporary residence/factual location;
- Passport details;
- Tax identification number;
- Military ID;
- Bank account details;
- Availability and details of veteran of the war status, child of fallen hero in the war status;
- Self-presentation video;
- Video/photo from events, educational process.

Information about education and background:

- Graduation school name, city, graduation year;
- College(s) or University(s) name(s), city(s), degree(s), program title(s), diploma(s) series and number, average diploma supplement score;
- Current school year, series and serial number of graduation certificate, serial number of secondary education diploma, final academic grades in Ukrainian and English languages, math, total average score; level of English language; English exam certificate scan and details; availability and details of diploma with honors, recognition of national or international contest related to Math, Business, IT; other educational certificates and details;
- Current and previous place(s) of work, position(s), duration(s) of the being on the position, CV scan and details;
- Background, relevant experience;
- Year of admission to AUK.

Technical information:

- Information AUK receives from your use of AUK website, such as the IP address, browser type, ISP, referring/exit pages, platform type, date/time stamp, number of clicks, domain name and country/state of all visitors to AUK website;
- Location information when you use AUK website as AUK may collect and process information about your location. AUK use various technologies and tools to determine location;
- Information that is considered aggregated data such as statistical or demographic data which AUK may use for any purpose. Aggregated data may be derived from your personal information but is not considered personal information in law as it does not directly or indirectly reveal your identity, unless AUK combines or connects aggregated data with your personal information so that it can directly or indirectly identify you;
- AUK collects technical data from various third parties and public sources, such as analytics providers, advertising networks, search information providers;
- Connection, browsing information (device ID, or ad recipient ID, etc.);
- Information about your visits to our website, including your full navigation path with URLs to our website, your views and transitions from it to other sites (including date and time), the pages you viewed, page load times, page load errors, how long you spent on certain pages, information about page-to-page interactions (such as scrolling, number of clicks, and mouse-overs), and methods used to page transition;
- Your data privacy and marketing communications preferences;
- Our correspondence with you, including any feedback, complaints and comments from you sent by telephone, email or social media, or any data about correspondence online, in the form of regular mail or personal correspondence and interactions between us. If we contact by telephone, we collect information about the telephone number used and any information collected through the call recording.

Other than as required by law, AUK do not collect any special categories of personal information about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). AUK will not collect any information about criminal convictions and offences.

Please note that we reserve the right to request additional personal data from you that is not specified here, if necessary to achieve the purposes specified below.

Remember that when we ask you to fill in your personal data in order to give you access to some features or services of our website, we mark certain fields as mandatory. The information in such fields is necessary for us to provide you with the services or give you access to the features in question. Please note: if you choose not to provide us with this information, you may not be able to complete your registration as a user or be unable to use these services or features.

HOW IS YOUR PERSONAL DATA COLLECTED?

We collect personal information about you directly from you, such as using our website, email applications, registration to events or personal submission of the documents and information to us, or from various third parties and public sources, such as analytics providers, advertising networks, search information providers.

HOW WILL WE USE INFORMATION ABOUT YOU?

For each use case mentioned below, we state the purpose for which we use and disclose the information and legal basis on which we rely as a basis for using such data.

Purpose	Personal Data used	Legal basis
Allow you to register, set up and maintain an online profile; to receive technical support if needed; to analyse your user experience to improve AUK website.	First name, last name; e-mail; technical information as it is described above.	It is necessary for AUK’s legitimate interests to allow you use AUK website, administer your registration; to monitor how AUK website is used to help us improve the layout and information available on AUK website; to provide a better service to AUK website users and to detect and prevent

		the misuse of AUK website, which are not overridden by your interests or your fundamental rights and freedoms which require protection of personal data.
Considering you for and contacting you about your application for study at AUK; considering you for and contacting you about your application for getting scholarship for study at AUK; considering you for and contacting you about possibility to study at our partner educational establishment.	Personal information; information about education and background as it is described above.	It is necessary for AUK's legitimate interests to approve you as a student of AUK and to get approval from donors to provide you with a scholarship, to get you submitted to study at our partner educational establishment, which are not overridden by your interests or your fundamental rights and freedoms which require protection of personal data.
Entering into reservation, educational and payment for education contract(s) with you, execution of such contracts.	Personal information as it is described above.	It is necessary to conclude and execute a contracts with you.
Issuance of internal documents required for educational process	Personal information as it is described above.	It is necessary to execute a contracts with you.
Filing information into state databases	Personal information; information about education and background as it is described above.	It is necessary for compliance with legal obligations under educational legislation.
Issuance of the documents on education	Personal information as it is described above.	It is necessary for compliance with legal obligations under educational legislation.
Keeping contact with you during and after education; respond to your questions, comments, complaints or other messages; informing you about educational programs available and other information we may deem to be important for you	Personal information as it is described above.	It is necessary for AUK's legitimate interests to allow us to correspond with you and to keep you informed about our products and services.
Updating you on any changes to our Privacy policy, security updates, changes to our website or online profile area	First name, last name; e-mail; contact details, phone number, address	It is necessary for compliance with legal obligations, such as in the areas of data protection law and corporate compliance laws.
In connection with, or during the negotiation of, any merger, sale of company assets, financing or acquisition of all or part of our business by another company, any other external	Personal information; Information about education and background as it is described above.	It is necessary for AUK's legitimate interests to improve and develop its business, legal obligation.

audit processes, cooperation with another educational establishments		
We may process your personal data in accordance with our regulatory requirements, which may include disclosing your personal data to third parties, including courts and/or regulatory or law enforcement authorities in connection with information requests, legal proceedings or investigations by such parties in any country in the world or where they are forced to do so	Personal information; information about education and background technical information as it is described above.	It is necessary for compliance with legal obligations and AUK's legitimate interests to cooperate with law enforcement and regulatory authorities.

DATA SHARING

We may share your personal data with the following categories of recipients:

Holding company, strategic partners: AUK may share personal data with its holding company, strategic partners involved into educational activity of AUK, into scholarship provision activity in order to provide you with high level education, possibility to study abroad in another educational establishments, possibility to get scholarship for education at AUK or otherwise as necessary for the purposes described above.

Suppliers and service providers: AUK may share personal data with suppliers and service providers to enable such parties to perform functions on our behalf and under our instructions in order to carry out the purposes identified above. These include: infrastructure and IT services providers, our finance systems and our students databases; third party consultants who provide us with support in respect of business analytics and marketing campaigns; and the providers of external venues where we host conferences and events. We require such parties by contract to provide reasonable security for personal data and to use and process such personal data on our behalf only.

Financial institutions: AUK may share personal data with financial institutions in connection with invoicing and payments.

Corporate purchasers: AUK may share personal data with any corporate purchaser, investor, financial investor or prospect to the extent permitted by law as part of any merger, acquisition, sale of AUK assets, investing, financing to AUK, as well as in the event of insolvency, bankruptcy, or receivership in which personal data would be transferred as an asset of AUK.

Mandatory disclosures and legal claims: AUK may share personal data in order to comply with tax reporting obligations, comply with any subpoena, court order or other legal process, to comply with a request from our regulators, governmental request or any other legally enforceable demand. We also share personal data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

Some of these recipients may be located outside of Ukraine and the European Economic Area, where the level of data protection differs from the level of data protection in Ukraine and the European Union. By agreeing to this Privacy policy, you give us your unequivocal consent to transfer your personal data to such providers. We ensure that your personal data does receive an adequate level of protection. We will use appropriate means to protect any personal data, such as standard contractual clauses or mandatory corporate rules permitted by relevant legal requirements. If you would like to see a copy of the specific data protection measures that apply to the export of your personal data, please contact us at dpo@auk.edu.ua.

We do not notify you on each and any transfer of your personal data. If you have questions about the parties with which we share personal data, please contact us at dpo@auk.edu.ua.

DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, contractors and third parties who have a business need

to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. Details of these measures may be obtained from dpo@auk.edu.ua.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

YOUR RIGHTS IN CONNECTION WITH YOUR PERSONAL DATA

By law you have the right:

- 1) to know about the sources of collection, the location of your personal data, the purpose of processing, the location or place of residence of the controller or operator of personal data or to give an appropriate mandate to obtain this information to persons authorized by you, except for cases established by law;
- 2) to receive information about the conditions for granting access to personal data, in particular information about third parties to whom your personal data is transferred;
- 3) to access your personal data;
- 4) to receive no later than thirty calendar days from the date of receipt of the request, except in cases provided by law, an answer on whether your personal data is being processed, as well as to receive the content of such personal data;
- 5) present a reasoned demand to the personal data controller with an objection to the processing of your personal data;
- 6) make a reasoned demand for the change or destruction of your personal data by any controller or operator of personal data, if these data are processed illegally or are unreliable;
- 7) to protect your personal data from illegal processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision of data, as well as to protect from providing information that is unreliable or dishonours honour, dignity and business reputation of natural person;
- 8) to file complaints about the processing of personal data with the Commissioner or the court;
- 9) to apply legal remedies in case of violation of the legislation on the protection of personal data;
- 10) to make a reservation regarding the limitation of the right to process your personal data when giving consent;
- 11) to withdraw consent to the processing of personal data;
- 12) to know the mechanism of automatic processing of personal data;
- 13) to protect against an automated decision that has legal consequences for you.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact dpo@auk.edu.ua.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

We inform you that you have the right to file a complaint with the competent supervisory authority for data protection, in particular to the Commissioner for Human Rights of the Verkhovna Rada of Ukraine: (<http://www.ombudsman.gov.ua/>).

COOKIES TERMS OF USE

Our website uses cookies to optimize user experience and ensure efficient functioning of the resource.

Cookies are small text files that are downloaded to your device by the websites you visit. After that, cookies are sent to the website during each subsequent visit or to another site that recognizes such a cookie. Cookies are used to ensure or improve the website's performance, as well as to provide information to its owners. Such information is used to provide more personalized and operational services.

The period of time for which cookies are stored on your device will depend on whether such cookies are "persistent" or "session". Persistent cookies are stored by the browser and remain relevant until the end of their set period of validity (if they are not deleted by the user by that time). Session cookies expire at the end of your session when you close your browser.

First-party cookies allow website owners to collect analytics data and remember user settings for a more personalized experience. First-party cookies are stored by the website or domain when it is visited. Third-party cookies are created by domains separate from the primary website visited.

What types of cookies do we use and for what purpose:

Cookie	Cookie type	Permanent/ session	First- party/ Third- party	Purpose
_gid	Analytics cookie	Permanent	Third-party	Installed by Google Analytics, _gid cookie stores information on how visitors use a website, while also creating an analytics report of the website's performance. Some of the data that are collected include the number of visitors, their source, and the pages they visit anonymously.
_ga	Analytics cookie	Permanent	Third-party	The _ga cookie, installed by Google Analytics, calculates visitor, session and campaign data and also keeps track of site usage for the site's analytics

				report. The cookie stores information anonymously and assigns a randomly generated number to recognize unique visitors.
_gcl_au	Analytics cookie	Permanent	Third-party	The _gcl_au cookie, installed by Google Conversion Linker, takes information in ad clicks and stores it in a first-party cookie so that conversions can be attributed outside the landing page.
__Secure-1PSIDTS	Advertisement cookie	Permanent	Third-party	Google targeting cookie. Used by for targeting purposes to build a profile of the website visitor's interests in order to show relevant & personalised Google advertising.
_hjIncludedInSessionSample, _hjAbsoluteSessionInProgress, _hjFirstSeen, _hjSessionUser, _hjSession	Analytics cookie	Permanent	Third-party	These are analytics cookies set by Hotjar which we use to collect information about how our visitors use the website. We use this information to compile reports and to improve the website experience.
_fbp	Advertisement cookie	Permanent	Third-party	This cookie is set by Facebook to display advertisements when either on

				Facebook or on a digital platform powered by Facebook advertising, after visiting the website.
IDE	Advertisement cookie	Permanent	Third-party	This cookie is set by doubleclick.net to provide ad delivery or retargeting.
__Secure, SIDCC, SID, AEC, NID, APISID, SEARCH_SAMESITE, SAPISID, SSID, HSID, AEC, SID, SSID	Advertisement cookie	Permanent	Third-party	These cookies are used by Google to display personalized advertisements on Google sites, based on recent searches and previous interactions.
VISITOR_INFO1_LIVE, LOGIN_INFO	Advertisement cookie	Permanent	Third-party	These cookies are used to play YouTube videos embedded on the website.
auk_session	Necessary	Session	First-party	A security cookie used to identify user session
XSRF-TOKEN	Necessary	Session	First-party	Security cookie used to protect the personal data passed to our website
uuid	Necessary	Session	First-party	A security cookie used to identify user session

By clicking "Accept all cookies" you agree to the placement of all cookies on your device.

You can accept, block or delete cookies installed on your computer by adjusting the settings of your browser, but remember that part of the site will not work correctly, some of its functions will not be available or will have errors.

You can find out about cookies by checking the cookie storage for each page of the site through the browser.

FINAL PROVISIONS

We may make changes to Privacy Policy from time to time. The new Privacy Policy will be effective from the moment it is posted.

CONTACT US

If you have questions or comments regarding this Privacy Policy, please contact us at:
dpo@auk.edu.ua