Privacy Notice

Information on the Processing of Personal Data

1. Who we are and how you can contact us

Kolégium Antona Neuwirtha, a civic association with its registered office at Námestie padlých hrdinov 7, 900 28 Ivanka pri Dunaji, Identification No. (IČO): 42138515, registered in the Register of Civic Associations maintained by the Ministry of the Interior of the Slovak Republic ("KAN"), is the controller of the personal data it processes in connection with its activities, in particular when organising educational, community, volunteering, fundraising and related activities.

For questions relating to the processing of personal data, you can contact KAN:

- by email: info@kolegium.org,
- in writing: Kolégium Antona Neuwirtha, Námestie padlých hrdinov 7, 900 28 Ivanka pri Dunaji.

This Privacy Notice applies to all persons whose personal data KAN processes in connection with its activities, in particular participants in programmes and events, enquirers and applicants, legal guardians of minor participants, alumni, donors, supporters, volunteers, tutors, teachers, partners, collaborators, employees, visitors to KAN's website and premises, and other persons communicating with KAN.

2. General principles of personal data processing

KAN processes personal data only to the extent necessary for a specific purpose and in a manner that is lawful, proportionate and transparent. We obtain personal data mainly directly from data subjects or, where necessary for a specific activity, from legal guardians, co-organisers, partners or schools.

The provision of certain data is necessary for registration for a programme, processing an application, concluding or performing a contract, providing a service or complying with a legal obligation. Where the legal basis is consent, the provision of data is voluntary.

3. Purposes for which we process personal data

Purpose of processing	Categories of data subjects	Categories of personal data	Legal basis	Retention period	Recipients or categories of recipients
Communication with persons interested in KAN's programmes, courses, events and activities	enquirers, applicants, legal guardians, teachers, partners, the public	first name, surname, email address, telephone number, content of communications and, where applicable, other data provided in the communication	Article 6(1)(b) GDPR (Regulation (EU) 2016/679) – pre-contractual steps, where the communication is aimed at participation in a programme or the conclusion of a contractual relationship; Article 6(1)(f) GDPR – KAN's legitimate interest in handling enquiries and communicating with interested persons	generally 2 years from the last communication or from the end of the relevant admission or educational process	providers of IT, email, cloud, online form and office services; persons authorised by KAN
Registration, selection and participation in KAN's educational	applicants, students, programme participants,	identification data, contact details, data provided in the application, data	Article 6(1)(b) GDPR – pre-contractual steps and performance of a contract or	for the duration of the programme and generally 3 years after its end; for unsuccessful	providers of IT, cloud, email, registration and online form services, tutors, co-organisers, accommodation providers,

programmes and activities	legal guardians, teachers, tutors	on school, studies, education, experience and motivation, the outcome of the selection process, data on participation in the programme and, where applicable, payment details	programme; Article 6(1)(f) GDPR – KAN's legitimate interest in the proper organisation, administration and documentation of the programme; Article 6(1)(c) GDPR – compliance with legal obligations, in particular accounting and tax obligations	applicants, generally 1 year from the end of the selection process; accounting documents generally 10 years	accountant, banks, legal and tax advisers, public authorities where required by law
Delivery and administration of courses, including online learning environments	students, course participants, teachers, tutors, legal guardians	identification data and contact details, login and security data, data on participation, attendance and activity in the online learning environment, communications within the programme, outputs of activities, technical logs to the extent necessary	Article 6(1)(b) GDPR – performance of a contract or programme; Article 6(1)(f) GDPR – KAN's legitimate interest in ensuring the functioning of the online learning environment, documenting the course of the programme and protecting the security of the system	for the duration of the programme and generally 2 to 3 years after its end; technical logs in accordance with the settings of the relevant service, generally only for as long as necessary	providers of IT services, Moodle and Google Workspace, technical support providers, tutors and persons authorised by KAN
Selection procedures, testing, assessment and feedback	applicants, students, programme participants, teachers, tutors	test results, assessments, self-assessments, questionnaires, feedback, motivation letters, CVs, notes from selection interviews or other interviews, academic outputs, essays, mentoring outputs and, where applicable, audio recordings if they form part of a specific activity and the data subject has been specifically informed of this	Article 6(1)(b) GDPR – performance of a contract or programme, where assessment, testing or mentoring forms part of the programme; Article 6(1)(f) GDPR – KAN's legitimate interest in evaluating and improving the quality of its programmes; Article 6(1)(a) GDPR – consent for voluntary questionnaires, testimonials or activities beyond the standard programme	for the duration of the programme and generally 3 years after its end; for unsuccessful applicants, generally 1 year; anonymised outputs may be retained for longer	providers of testing services and of IT and cloud services, tutors, collaborating teachers, persons authorised by KAN

Organisation of residential programmes, camps, seminars, weekend activities and accommodation	programme participants, children, legal guardians, guests, tutors, speakers	identification data and contact details, date of birth or age, data on the stay, school or programme, contact details of legal guardians or emergency contacts, payment details, data on dietary requirements, allergies, health restrictions or other special needs to the extent necessary	ordinary personal data: Article 6(1)(b) GDPR – performance of a contract or delivery of the activity; Article 6(1)(c) GDPR – legal obligations, where applicable; Article 6(1)(f) GDPR – KAN's legitimate interest in the safe organisation of the stay; special categories of data: Article 9(2)(a) GDPR – explicit consent; Article 9(2)(c) GDPR – protection of vital interests in emergencies	for the duration of the activity and generally 1 year after its end; accounting documents generally 10 years; data concerning health and special needs only for as long as necessary to deliver the activity and subsequently to deal appropriately with any related matters	accommodation providers, tutors, co-organisers, providers of IT and online form services, accountant, banks, insurance companies, legal advisers, public authorities where required by law
Communication with alumni, the community, teachers, schools, partners and supporters	alumni, teachers, head teachers, partners, supporters, collaborators	first name, surname, contact details, organisation, position, school, programme affiliation, cohort or alumni status, history and status of cooperation, content of communications	Article 6(1)(f) GDPR – KAN's legitimate interest in maintaining reasonable contact with persons who have taken part in KAN's activities or who cooperate with KAN, and in developing a professional, educational and alumni community	for the duration of active involvement in the community or cooperation; thereafter generally no longer than 5 years from the last active communication or interaction, unless the data subject objects or requests erasure earlier	providers of IT, cloud, email and online form services; persons authorised by KAN; co-organisers of specific activities
Newsletter and electronic updates on KAN's activities	newsletter subscribers, persons interested in KAN news	first name, surname, email address and, where applicable, organisation or position, information on the consent given, data on unsubscribing, technical data relating to the delivery of electronic communications	Article 6(1)(a) GDPR – consent to receiving the newsletter or similar electronic communications; for individual, reasonable communication with existing contacts, the legal basis may be Article 6(1)(f) GDPR – KAN's legitimate interest in maintaining relationships, provided that the data subject can	until consent is withdrawn or the person unsubscribes; records of unsubscribing or withdrawal of consent for as long as necessary to demonstrate that the request to unsubscribe has been respected	providers of mailing and newsletter tools, in particular Mailchimp, providers of IT and cloud services

			easily object or unsubscribe		
Fundraising, donor and partner administration	donors, supporters, partners, participants in charity events	first name, surname, organisation, position, email address, telephone number, address, history of support or donations, amount of the donation or support, communications, data relating to a donation, partnership or participation in a charity event; for the donation portal dar.kolegium.org, also data on regular support and on uncompleted donations	Article 6(1)(b) GDPR – performance of a donation, partnership or similar agreement; Article 6(1)(c) GDPR – accounting and tax obligations; Article 6(1)(f) GDPR – KAN's legitimate interest in maintaining relationships with donors, supporters and partners and in raising support for KAN's non-profit objectives; Article 6(1)(f) GDPR – KAN's legitimate interest in sending a single reminder to a donor who did not complete a donation on the donation portal; Article 6(1)(a) GDPR – consent for donor communications (sending appeals to donors)	for the duration of the relationship and generally 5 years from the last relevant communication or interaction; accounting documents generally 10 years	providers of IT and cloud services, fundraising and payment platforms (including the payment gateway of the donation portal), accountant, banks, legal and tax advisers, public authorities
"Moja podpora" (My Support) account on the donation portal dar.kolegium.org	donors with an account in the Moja podpora section	first name, surname, email address, login codes, data on regular support and a record of the creation of the account (time, version of the rules, IP address)	Article 6(1)(b) GDPR – performance of a contract; for the record of the creation of the account, Article 6(1)(f) GDPR – KAN's legitimate interest in demonstrating the creation of the account and the wording of the rules in force at the time of its creation	for as long as the account exists and for the necessary period after it is closed	providers of IT services, payment service providers (payment gateway)
Personal fundraising campaigns on the donation portal dar.kolegium.org	creators of personal fundraising campaigns	the creator's name, text, photograph and telephone number, the	Article 6(1)(b) GDPR – performance of a contract	for as long as the campaign page is available or until the creator	the public (campaign page), providers of IT services

		campaign end date and the total amount of donations; the telephone number is used to contact the creator about matters relating to the campaign, in particular hiding the campaign, reported content or questions about donations		requests its removal	
Photographs and video recordings documenting KAN's events and activities	event participants, students, guests, tutors, the public	likeness, image or audiovisual recording, information on attendance at the event and, where applicable, first name and surname if needed for internal records or documentation of the event	Article 6(1)(f) GDPR – KAN's legitimate interest in reasonable documentation of its own activities and of the course of events and activities, in particular in the case of group, illustrative or atmospheric shots that do not feature a specific person as the main subject of promotion	generally 3 years from the making of the recording or the holding of the event; longer only to a reasonable extent where the recording documents a significant public, historical, community or organisational activity of KAN and does not disproportionately interfere with the rights of data subjects	providers of IT, cloud and communication services, persons authorised by KAN and, to a reasonable extent, the public upon publication on the website or social media
Promotional photographs, video recordings, testimonials and evaluative statements	programme participants, alumni, tutors, supporters, partners	first name, surname, likeness, image or audiovisual recording, voice recording, position or organisation, information on participation in the activity, testimonial, evaluative statement or other publicly presented output	Article 6(1)(a) GDPR – consent of the data subject, in particular in the case of individual portraits, promotional shots, videos or testimonials focused on a specific person; in exceptional, proportionate cases, Article 6(1)(f) GDPR – KAN's legitimate interest in informing the public about its activities, where this does not involve the individual promotion of a specific person and the processing does not	until consent is withdrawn, generally no longer than 5 years from when consent was given or from the making/publication of the recording; where based on legitimate interest, generally 3 years, unless a longer period is appropriate given the nature of the output	providers of IT, cloud, web and communication services, social media providers, the public upon publication

			disproportionately interfere with that person's rights		
Photographs, video recordings and outputs relating to minors	minor participants, legal guardians	the child's first name and surname, age or school year/group, likeness, image or audiovisual recording, voice recording, information on participation in the activity and, where applicable, a testimonial or output of the activity	for promotional or individual publication, Article 6(1)(a) GDPR – consent of the legal guardian; for reasonable internal or documentary records, Article 6(1)(f) GDPR – KAN's legitimate interest in documenting the activity, provided that the processing is non-promotional, proportionate, non-intrusive and not contrary to the best interests of the child	until consent is withdrawn, generally no longer than 5 years in the case of promotional use; for documentary records, generally 3 years from the activity, unless a shorter period is required given the nature of the record or an objection by the legal guardian	providers of IT, cloud, web and communication services, social media providers, the public upon publication based on consent
Sale of KAN's publications, recordings, materials and promotional items	buyers, persons placing orders, participants in educational activities	first name, surname, contact details, billing details, delivery address, order, payment details, data on product preferences, communications	Article 6(1)(b) GDPR – performance of a contract; Article 6(1)(c) GDPR – accounting and tax obligations	for the time needed to process the order and thereafter generally 10 years for accounting documents	e-shop solution providers, WordPress/WooCommerce, IT providers, payment service providers, banks, accountant, delivery services, legal and tax advisers
Accommodation or overnight stays of guests on KAN's premises	guests, visitors, students, hosts	first name, surname, contact details, date and details of the stay, information on the relationship with KAN and, where applicable, data necessary for registering the accommodation and for the safe organisation of the stay	Article 6(1)(b) GDPR – provision of accommodation or an overnight stay; Article 6(1)(c) GDPR – compliance with legal obligations, where applicable; Article 6(1)(f) GDPR – KAN's legitimate interest in security and in keeping records of persons on the premises	for the duration of the stay and generally 1 year after its end; data or documents required by law for the relevant statutory periods	providers of IT and online form services, persons authorised by KAN, legal advisers, public authorities where required by law
Personnel, volunteer and collaborator administration	employees, job applicants, volunteers, tutors, collaborators, suppliers	identification data and contact details, date of birth or birth number (rodné číslo), address, data on the employment, volunteering or	Article 6(1)(b) GDPR – employment or contractual administration; Article 6(1)(c) GDPR – compliance with legal obligations;	for the duration of the relationship and thereafter in accordance with statutory periods; payroll and personnel records in accordance with specific	accountant, payroll service provider, banks, insurance companies, the Social Insurance Agency (Sociálna poisťovňa), health insurance companies, tax authorities, legal and tax advisers, providers of IT services

		contractual relationship, payroll, tax and social security contribution data, attendance, qualifications, bank account, communications	Article 6(1)(f) GDPR – KAN's legitimate interest in the protection of legal claims	legislation; for contractual cooperation and accounting documents, generally 10 years	
Contractual and professional communication	suppliers, partners, collaborators, tutors, professional advisers, contact persons of legal entities	first name, surname, position, organisation, email address, telephone number, contractual data, content of communications, data on the performance of the contract	Article 6(1)(b) GDPR – performance of a contract or pre-contractual steps, where the data subject is a party to the contract; Article 6(1)(f) GDPR – KAN's legitimate interest in business, contractual and professional communication	for the duration of the contractual relationship and generally 5 years after its end; accounting documents generally 10 years	providers of IT and cloud services, accountant, banks, legal and tax advisers, public authorities
Compliance with legal obligations, accounting and tax matters	donors, supporters, buyers, suppliers, employees, collaborators, partners, contact persons	identification data, contact details, billing details, payment details, data in accounting and tax documents, contracts, data on donations and transactions	Article 6(1)(c) GDPR – compliance with KAN's legal obligations	generally 10 years or as required by specific legislation	accountant, auditor, banks, tax authorities, public authorities, legal and tax advisers, providers of IT services
CCTV system	visitors to KAN's premises, employees, collaborators, activity participants, other persons present in the monitored areas	video footage, time and place of the recording	Article 6(1)(f) GDPR – KAN's legitimate interest in protecting property and the safety of persons and in preventing security incidents	generally 7 days; in the event of an incident, for as long as necessary to investigate it, protect legal claims or cooperate with the competent authorities	persons authorised by KAN, the provider of CCTV system management or maintenance, legal representative, insurance company, the police and other competent public authorities
Website and cookies	visitors to the website and to the donation portal dar.kolegium.org	IP address, cookies, technical data about the device and browser, data on use of the website, online identifiers	strictly necessary cookies – technical necessity for ensuring the functioning of the website; analytics and marketing cookies – Article 6(1)(a) GDPR – consent of the data subject	depending on the type of cookie; strictly necessary cookies for the duration of the session or for a short period, analytics and marketing cookies as indicated in the cookie banner and in accordance with the consent given	providers of web hosting, IT services, website management, analytics and marketing tools and, where applicable, providers of social media and embedded content

4. Processing of personal data of children and legal guardians

When organising educational, community, camp, residential and related activities, KAN may process the personal data of children and their legal guardians. We process children's personal data only to the extent

necessary and with particular emphasis on protecting their privacy and safety and on the best interests of the child.

In the case of minor participants, we may process in particular the identification data and contact details of the child and the legal guardian, and data necessary for organising participation, for the child's safety, for communication with the legal guardian and for the proper delivery of the activity.

Where KAN processes, to the extent necessary, data on a participant's health restrictions, allergies, health-related dietary restrictions or other special needs, it does so mainly for the purpose of protecting the participant's health and safety during the activity. Such data may constitute a special category of personal data under Article 9 GDPR. The legal basis for the processing is mainly the explicit consent of the data subject or the legal guardian under Article 9(2)(a) GDPR or, where necessary in a specific situation, the protection of vital interests under Article 9(2)(c) GDPR.

Where the legal basis for processing is consent, consent in respect of a minor child is given by the legal guardian, unless the applicable legislation or the nature of the processing allows a different approach.

5. Photographs and video recordings from events

Photographs and video recordings may be taken during KAN's activities. KAN distinguishes between reasonable documentation of the course of an event and the promotional use of recordings.

On the basis of legitimate interest, KAN may process ordinary documentary, group or illustrative shots from events that do not feature a specific person as the main subject of the shot or of promotion. The legitimate interest is the reasonable documentation of KAN's activities, the course of events and community or educational activities.

KAN processes individual portraits, promotional shots, videos focused on a specific person, testimonials, evaluative statements and recordings of minors for promotional purposes on the basis of the consent of the data subject or their legal guardian. For participants under 18 years of age, we require the consent of both the legal guardian and the participant themselves for the promotional use of photographs and video recordings. The consent covers both the making and the publication of recordings and states where we publish them (website, social media, printed materials).

Where we process photographs or video recordings on the basis of legitimate interest, the data subject has the right to object to such processing. Where the processing is based on consent, the data subject or the legal guardian may withdraw consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If you do not wish to be photographed or recorded at an event, you can let us know before or during the event. We will take reasonable measures to respect your request.

6. To whom personal data may be disclosed

Personal data may be disclosed, only to the extent necessary, in particular to the following categories of recipients:

- providers of IT services, web hosting, technical support and website management,
- providers of cloud, email and office services, in particular Google services,
- providers of online form, registration and learning platforms, in particular Paperform, Moodle and similar tools,
- providers of e-shop solutions, in particular WordPress and WooCommerce,
- providers of mailing and newsletter tools, in particular Mailchimp,
- providers of social media and online communication services, in particular Meta,
- providers of testing, educational or assessment services,
- tutors, collaborating teachers, academic leads and co-organisers of programmes, events or projects, where necessary to carry out a specific activity,
- accommodation providers and providers of services related to the organisation of residential activities,
- an accountant, payroll service provider, auditor or accounting firm,

- banks, payment service providers (including the payment gateway of the donation portal) and providers of related financial services,
- legal, tax and other professional advisers,
- providers of CCTV system management or maintenance,
- insurance companies, where necessary to deal with an insurance claim,
- public authorities, in particular courts, the police, public administration bodies or inspection authorities, where required by law or necessary to protect KAN's rights and legitimate interests.

Each category of recipients is involved only to the extent required for the specific purpose of processing. Where KAN uses processors that process personal data on its behalf, it has concluded data processing agreements with them in accordance with Article 28 GDPR.

7. Joint controllers

In selected educational activities or programmes organised in cooperation with Základná škola Citadela (Citadela Primary School), Zochova 6 – 8, 811 03 Bratislava – mestská časť Staré Mesto, Identification No. (IČO): 54851149, KAN and Základná škola Citadela may act as joint controllers under Article 26 GDPR where they jointly determine the purposes and means of the processing of personal data in a specific activity.

The information in this section applies only to those activities for which joint controllership is stated in the application form, an information document, the terms and conditions of the specific activity or another notice provided to the data subject.

The essence of the arrangement between the joint controllers is, in particular, the allocation of responsibility for informing data subjects, handling their requests and ensuring appropriate protection of personal data in the joint activity. The primary contact point for data subjects is KAN at info@kolegium.org. This is without prejudice to the data subject's right to exercise their rights against any of the joint controllers.

If another partner or co-organiser also acts as an independent or joint controller in a specific activity, the data subject will be informed of this in the application form, the terms and conditions of the specific activity or another separate notice.

8. Transfers of personal data to third countries

When certain service providers are used, in particular in the areas of email communication, cloud services, analytics, social media, online advertising, online form tools or newsletter tools, personal data may be transferred to countries outside the EU/EEA or accessed from such countries.

In the course of its activities, KAN may use, in particular, the services of Google, Meta, Mailchimp or other providers whose services, depending on their settings and the way they are used, may involve the transfer of personal data to, or access to personal data from, countries outside the EU/EEA, in particular the United States of America.

Such transfers take place only under the conditions laid down in the GDPR, in particular on the basis of an adequacy decision of the European Commission, the recipient's certification under the EU-U.S. Data Privacy Framework, standard contractual clauses or another appropriate mechanism under the GDPR.

KAN does not provide personal data to these providers beyond what is necessary to use the relevant service. KAN will provide further information on specific providers, the categories of data transferred and the safeguards applied upon request.

9. CCTV system

KAN uses a CCTV system for the purposes of protecting property and persons, preventing unlawful conduct and dealing with security incidents.

The monitored areas are mainly the entrance areas, corridors, common areas, car park and outdoor grounds of KAN, in particular the areas around the building at Námestie padlých hrdinov 7, Ivanka pri Dunaji. The monitored areas are marked with information signs.

The legal basis for the processing is KAN's legitimate interest under Article 6(1)(f) GDPR. The legitimate interest is the protection of property and the safety of persons and the prevention of damage or other security

events.

The personal data processed are the video footage of a person and the time and place of the recording. The CCTV system is not used to record sound.

CCTV recordings are retained for a maximum of 7 days, given the nature of the monitored areas, which also include the outdoor grounds, the car park and common areas, where an incident may only be discovered after some time, in particular after a weekend or public holiday or at times when fewer people are present on KAN's premises.

After this period, the recordings are automatically deleted unless an incident has occurred. In the event of an incident, the relevant recordings may be retained for longer, namely for the period necessary to investigate the incident, to protect KAN's rights and legitimate interests, to exercise legal claims or to cooperate with the competent authorities.

The recipients of CCTV recordings may, to the extent necessary, include persons authorised by KAN, the provider of CCTV system management or maintenance, a legal representative, an insurance company and competent public authorities, in particular the police.

The CCTV system is not used for the systematic monitoring of the behaviour of children, activity participants, employees, volunteers or any other persons.

10. Cookies

Cookies and similar technologies may be used on KAN's website and on the donation portal dar.kolegium.org. Cookies are small text files stored on the user's device that enable the website to function or allow information to be obtained about its use.

KAN uses, in particular, the following categories of cookies:

- strictly necessary cookies – ensure the basic functioning and security of the website; these cookies are used without consent where they are strictly necessary to provide a service explicitly requested by the user,
- analytics cookies – help KAN understand how the website is used and improve its functioning,
- marketing cookies – may be used to measure or personalise communication and content, in particular in connection with third-party services.

Analytics and marketing cookies are stored only after consent has been given via the cookie banner. Consent can be withdrawn or changed at any time via the cookie settings available on the website.

Detailed information on specific cookies, their purpose, providers and retention period is available in the cookie banner or in the separate cookie policy.

11. Your rights as a data subject

As a data subject, you have, under the conditions laid down in the GDPR, in particular the following rights:

- the right of access to personal data,
- the right to rectification of inaccurate or incomplete data,
- the right to erasure of personal data,
- the right to restriction of processing,
- the right to object to processing,
- the right to data portability,
- the right to withdraw consent where the processing is based on consent,
- the right to lodge a complaint with a supervisory authority.

Where we process personal data on the basis of legitimate interest, you have the right to object to such processing at any time. If you object to processing for direct marketing purposes, we will no longer process the personal data for that purpose.

Where the processing is based on consent, you have the right to withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

You can exercise your rights by email at info@kolegium.org or in writing at the address of KAN's registered office.

We will generally respond to your request within 1 month of receiving it. In justified cases, this period may be extended by a further 2 months, in which case we will inform you. Where necessary, we may request additional information to verify your identity.

Exercising your rights is free of charge. However, where a request is manifestly unfounded or excessive, in particular because of its repetitive character, KAN may, in accordance with the GDPR, charge a reasonable fee or refuse to act on the request.

12. Complaint to a supervisory authority

If you believe that the processing of your personal data infringes the GDPR, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement (Article 77 GDPR). In Slovakia, the supervisory authority is:

Office for Personal Data Protection of the Slovak Republic Budova Park One Námestie 1. mája 18 811 06 Bratislava Slovak Republic Website: www.dataprotection.gov.sk Email: statny.dozor@pdp.gov.sk

13. Automated individual decision-making and profiling

KAN does not carry out automated individual decision-making or profiling within the meaning of Article 22 GDPR.

14. Changes to this Privacy Notice

KAN may update this Privacy Notice, in particular if there is a change in the purposes of processing, the services used, the categories of recipients or the legislation. The current version of this Privacy Notice is published on KAN's website.