

Data Privacy Policy of Personal Data

Introduction

Politehnica University Timisoara, hereinafter referred to as UPT, has established this Data Privacy Policy to provide a comprehensive framework for the proper functioning and use of its website, nextgen.upt.ro. This policy works together with the Cookie Policy to regulate data handling processes.

The educational activities carried out by UPT, along with its related activities, require the generation, collection, storage/archiving, and processing of various categories of personal data. These data belong to multiple categories of data subjects, including but not limited to students, postgraduate students, doctoral students, researchers, employees, applicants for vacant positions, clients, and suppliers of UPT, as well as other individuals who engage in contractual relations with UPT.

Personal data categories may vary, ranging from identification and contact data to audio/video recordings collected by surveillance cameras installed in different spaces of UPT. Additionally, UPT collects audio/video recordings resulting from online educational activities facilitated through the Virtual Campus platform developed by UPT or other videoconferencing platforms used for the educational process and its related activities. Personal data represents any information or set of information about a natural person that leads to their identification or any information that, when combined with other data held or obtained by UPT, can lead to the identification of the data subject. Moreover, the regulation on the processing of personal data explicitly refers to the concept of "special categories" of personal data, which includes sensitive personal information (physical or mental health, racial origin, sexual orientation, ethnic origin, religious beliefs).

According to the EU Regulation no. 679/2016 concerning the processing of personal data and the free movement of such data (General Data Protection Regulation - GDPR), UPT is designated as a data controller. It processes personal data strictly in accordance with data protection laws.

Key principles:

1. **Lawful, Fair, and Transparent Processing:** Data must be processed lawfully, fairly, and in a transparent manner concerning the data subject.
2. **Purpose Limitation:** Data should be collected for specified, explicit, and legitimate purposes and not processed further in a way incompatible with those purposes.
3. **Data Minimization:** Data must be adequate, relevant, and limited to what is necessary for the purposes for which it is processed.
4. **Accuracy:** Data must be accurate and, where necessary, kept up to date. Inaccurate data, considering its purposes, should be erased or rectified without delay.

5. **Storage Limitation:** Data must be kept in a form that allows the identification of the data subjects for no longer than necessary for the purposes for which it is processed.
6. **Integrity and Confidentiality:** Data must be processed in a way that ensures its security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

Collected data through the website

UPT collects personal data through its website (nextgen.upt.ro) to ensure it is used for purposes compatible with individual rights and freedoms, as outlined in the GDPR. Information such as the number of site visitors, visitor profiles, and session details are collected using cookies to enhance user experience and security.

Reasons and methods for using collected data

UPT uses aggregated data (not identifying individuals) to:

- Create user profiles for tailored content.
- Audit website activity.
- Perform academic analyses and evaluations.

These data are used to improve user experience and maintain website security. They may also be disclosed in the event of a security incident or breach.

Duration of data storage/archiving

UPT does not retain personal data through its website beyond what is necessary. The data collected through online services are subject to confidentiality terms set by these services, ensuring data protection as per GDPR standards.

Transfer of personal data

All faculties, departments, and administrative units within UPT share responsibility for processing and transferring personal data according to GDPR Article 26. If requested, UPT can provide a summary of the basic conditions of this joint control. Although these units share responsibility for data processing, they cannot act as legal representatives for each other.

Security measures for personal data protection

UPT implements appropriate measures to ensure that data collected through its website is protected against unauthorized access, use, or modification, illegal or accidental destruction, and accidental loss. This includes administrative, organizational, technical, and physical security practices.

Policy regarding minors' access

The NextGen website does not intentionally collect data from users under the age of 16. If a parent or guardian informs UPT of such data, UPT will take the necessary steps to delete

the information. If you believe that the UPT website has collected information about a person under the age of 16, please contact: datapersonale@upt.ro.

1. General framework and principles of processing personal data

The terms outlined below have the meaning defined by the EU Regulation no. 679/2016 on Personal Data Protection and will be used as such throughout this Data Privacy Policy:

- **Personal Data (PD):** Any information relating to an identified or identifiable natural person (“data subject”); an identifiable person is one who can be identified, directly or indirectly, particularly by reference to an identifier such as a name, ID number, location data, online identifier, or one or more specific factors to the physical, physiological, genetic, mental, economic, cultural, or social identity of that person.
- **Processing:** Any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure, or destruction.
- **Controller:** A natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.
- **Restriction of Processing:** Marking stored personal data to limit its future processing.
- **Recipient:** A natural or legal person, public authority, agency, or another body to whom personal data is disclosed, whether a third party or not.
- **Third Party:** A natural or legal person, public authority, agency, or body other than the data subject, controller, processor, and persons authorized to process personal data under the direct authority of the controller or processor.

Politehnica University Timisoara, as a personal data controller, adheres to the fundamental principles of personal data protection and provides the necessary organizational and IT framework for processing this data securely and confidentially. The personal data processed via the UPT website must be:

1. Processed lawfully, fairly, and transparently regarding the data subject, meeting the framework and requirements for conducting the educational process correctly.
2. Collected for specified, explicit, and legitimate purposes and not processed further in a manner incompatible with those purposes.
3. Adequate, relevant, and limited to what is necessary concerning the purposes for which they are processed.
4. Accurate and, where necessary, kept up to date; inaccurate data, considering the purposes for which they are processed, must be erased or rectified without delay.
5. Kept in a form that permits the identification of data subjects for no longer than necessary for the purposes for which the data is processed.
6. Processed in a way that ensures appropriate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organizational measures.

2. What type of personal data is collected through the website?

The website (nextgen.upt.ro) collects personal data and ensures that this information is used for purposes that are compatible with the individual rights and freedoms of each user, in accordance with EU Regulation no. 679/2016 of the European Parliament and Council of April 27, 2016.

The website uses IT services to collect standard information regarding a browsing session on the site and details of visitor behavior. Information collection is conducted using cookies. A cookie is a small text file sent by a web server to a web browser, allowing the identification of a user/device. The text is passive—it does not contain software, viruses, or spyware and cannot access information on the user's hard drive.

This service is used to collect information, such as the number of site visitors or visits to pages of interest, the profile of visitors (IP address, type of operating system used, device type), and the type and version of browser used. Demographic data is also collected, including information on whether the user accessed a UPT website page through an external link.

3. Why and how does UPT use the collected data?

UPT uses information in aggregate form (no individual can be identified) for the following purposes:

- To create user profiles for tailoring content.
- To audit the website's activity.
- To perform academic analysis and evaluations.

This information is used to continuously improve the user experience on the university's website, as well as to ensure and maintain its security. Data may be used and disclosed in the event of a security incident or breach.

4. How long are personal data stored/archived?

Politehnica University Timisoara does not actually store/archive personal data through its website. As stated in section 2, data is collected through IT services and is subject to the confidentiality conditions of that service.

5. Transfer of personal data

All faculties, departments, and administrative entities of UPT are collectively responsible (“joint controllers”) for the processing and transfer of data in accordance with Article 26 of the GDPR (General Data Protection Regulation). Upon request, UPT can provide a summary of the basic terms of this joint controller agreement. Despite their shared responsibility for data processing, these constituent units of UPT cannot act as legal representatives for one another.

6. Security measures for the protection of personal data

UPT has appropriate measures in place to ensure that users' data on the website is protected against unauthorized access, use, or modification, illegal or accidental destruction, and accidental loss.

UPT employs administrative, organizational, technical, and physical methods to ensure information security both on the website and within the institution. The security measures are designed to maintain an appropriate level of confidentiality, integrity, and availability of data. However, every user must be aware that there is always a risk associated with transmitting information over the Internet and must assume this risk.

7. Policy regarding access for minors (Individuals under 16 years of age, according to EU legislation definition)

The NextGen website does not intentionally collect information from users under the age of 16. If a parent or legal guardian notifies UPT about the existence of such personal data, UPT will take all necessary measures to delete the information. If you believe that information from an individual under 16 years of age has been collected through the website nextgen.upt.ro, please contact us at the email address: datapersonale@upt.ro.

8. UPT presence on social media and media channels

UPT is active on various media channels and social networks to present its educational offer, activities, and events. When accessing any link leading to UPT's social media pages, you are identified via your profile on that platform, and you are subject to the privacy policies of those services.

Social Media Channels Include:

- **Facebook:** [UPT's page on Facebook.](#)
- **Twitter:** [UPT's page on Twitter.](#)
- **YouTube:** [UPT's channel on YouTube.](#)
- **LinkedIn:** [UPT's profile on LinkedIn.](#)

Changes to the Privacy Policy

UPT reserves the right to revise and periodically modify the privacy policy. Any changes will be published on the UPT website. Please check this page periodically to stay informed about updates.

9. Links to other websites

Links to third-party websites on the NextGen website are provided for informational purposes for your convenience. If you use these links, you will leave the NextGen website and be subject to the privacy policies of the accessed websites. UPT has not reviewed all of these third-party sites, does not control them, and is not responsible for these websites, their content, or their availability. UPT does not endorse and makes no representations about them, any material found there, or any results that may be obtained from using them. If you decide to access any third-party websites linked to the NextGen website, you do so entirely at your own risk.

Please note that the terms of this privacy policy do not apply to other websites or external content, nor to any processes of personal data processing that may occur after you click on

links to such external websites. We suggest that you read the privacy policies of each website you visit.

10. Contact details and methods for the data protection officer at UPT

If you have questions or concerns regarding the processing of your personal data, you can contact the Data Protection Officer of the Politehnica University Timișoara at the following email address: datepersonale@upt.ro.

Data Protection Officer

Politehnica University Timisoara

Piața Victoriei, no. 2, 300006, Timișoara, Timiș County, Romania

Tel: +40 256 40 30 11

Fax: +40 256 40 30 21

E-mail: datepersonale@upt.ro

In these requests, please do not disclose sensitive personal data (such as information regarding religious beliefs, ethnic or racial origin, or any other information related to health or union membership) when contacting us.

UPT, through the Data Protection Officer, responds to requests from data subjects without undue delay or provides the data subject with the reason for the delay. If the request cannot be complied with, the reason for the refusal will be provided. If the data subject submits a request electronically, information will be provided in electronic format where possible, unless the data subject requests another format.

If requests from a data subject are evidently unfounded or excessive, particularly due to their repetitive nature, the operator may:

- Charge a reasonable fee based on the administrative costs of providing the information or communication, or for taking the requested actions;
- Refuse to comply with the request.

In these cases, the operator bears the burden of demonstrating the evident unfounded or excessive nature of the request. Additionally, UPT has the responsibility to take all reasonable measures to verify the identity of a data subject requesting access to data, particularly in the context of online services and online identifiers. An operator should not retain personal data solely for the purpose of being able to respond to potential requests.

Changes to the Privacy Policy

Politehnica University Timisoara reserves the right to periodically review and modify the privacy policy.

Any changes to this Data Privacy Policy will be made public through the university's website (upt.ro). Please check this page regularly to stay informed about updates and modifications made.