

PRIVACY POLICY

Campus X OOD (“Campus X”) ensures and safeguards the privacy of the personal data it processes with utmost care and in accordance with the highest national, EU and international standards.

When you interact with us, you may share personal information with us which helps us to identify you (e.g. name, email address, address, telephone number). This is known as “personal data”.

This Policy sets out the common privacy principles, as well as the new GDPR Standard, which requires an even higher level of compliance from Campus X.

This draft Policy is strictly subject to any changes that Campus X wishes to take.

CONTACT US

Campus X acts as “data controller” for the personal data it processes in the framework of this Privacy Policy.

Should you have any questions about this Policy then please contact Campus X Compliance at compliance@campusx.com or in writing to Campus X OOD, Data Privacy Officer, 1729 Sofia, 31 Aleksandar Malinov Blvd., Bulgaria.

PERSONAL DATA

Campus X may process, inter alia, one or more types of the following personal data:

- job applicants and Campus X personnel, relating to their (potential) role within Campus X including contact details, résumé, professional development, personnel file, benefits, compensation, etc.;
- Campus X employees’ family members and dependents, relating to employee benefits and services;
- online registered users of the platforms of Campus X;
- consumers/members of the public, some of whom also become direct customers, relating to the services we provide to them or that they ask us about;
- business associates and personnel of Campus X’s suppliers and other agents for the management of the business relationship;
- the personal data of the complainants, persons who entered in a written correspondence with a Campus X or deposited with documents containing their and / or foreign personal data and of other persons who, in any case, have contacted Campus X in its capacity of a data controller, and
- images captured via CCTV cameras while Data Subject is within the Campus X’s premises.
- Other information collected on paper or electronically for visitors in the Campus X’s premises.
- Information about personal details of representatives of clients or customers.

DATA THAT WE COLLECT WHEN YOU INTERACT WITH CAMPUS X SITES

We use cookies and other tracking technology which collect certain kinds of information when you interact with our site. Please see our [Cookie Notice](#) for information on these technologies and your rights in relation to them.

LEGAL BASIS FOR US PROCESSING YOUR DATA

There are a number of different grounds that we are lawfully able to process your personal data under the requirements of the EU Data Protection law, as follows:

- **Legitimate interests**

Campus X may process your data where it is necessary for the purposes of the legitimate interests pursued by Campus X or by a third party, except where such interests are overridden by the interests or fundamental rights or freedoms, which require protection of personal data.

- **Consent**

In certain circumstances, we will seek to obtain your explicit consent before we undertake certain processing activities with your personal data. This means that:

- you have to give us your consent freely, without us putting you under any type of pressure
- you have to know what you are consenting to – so we'll make sure we give you enough information
- you should only be asked to consent to one processing activity at a time – we therefore avoid "bundling" consents together so that you don't know exactly what you're agreeing to, and
- you need to take positive and affirmative action in giving us your consent – we're likely to provide a tick box for you to check so that this requirement is met in a clear and unambiguous fashion.

- **Performance of our contract**

In some case, we will need to process your personal data in order to execute the obligations under our contract or in order to undertake the necessary steps to enter into a contract.

- **Compliance with legal obligation**

Processing of your personal data may also be needed for compliance with a legal obligation to which Campus X is subject, for example, because of a request by a tax authority or in connection with any anticipated litigation.

We do not think that any of the above activities prejudice you in any way. However, you do have the right to object to us processing your personal data in certain circumstances.

PRINCIPLES OF PROCESSING

Campus X shall process Personal Data in full observance of the following principles:

<i>Lawfulness, fairness and transparency</i>	Personal Data shall be processed lawfully, fairly and in a transparent manner in relation to the Data Subject.
<i>Purpose limitation</i>	Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
<i>Data minimization</i>	Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
<i>Accuracy</i>	Personal Data shall be accurate and, where necessary, kept up to date.
<i>Storage limitation</i>	Personal Data shall be kept in a form, which permits identification of Data Subjects for no longer than is necessary for the purposes for which the Personal Data are processed.
<i>Integrity and confidentiality</i>	Personal Data shall be processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.
<i>Accountability</i>	Campus X, as Data Controller shall be responsible for, and be able to demonstrate compliance with the applicable Data Protection Law.

RECORDS OF PROCESSING

Campus X shall maintain an overview of all Processing activities within the organisation (e.g. what kind of data categories are being processed, by whom (which departments or business units) and for which underlying purposes of processing (“Records for Processing”).

The Records of Processing shall explicitly state the Lawful Basis and Purpose(s) of Processing.

DATA MINIMIZATION

Campus X shall Process Personal Data only if and to the extent it is adequate, relevant and limited to what is necessary to achieving business-related purposes.

Any additional Personal Data, which reaches Campus X (either intentional or accidentally), from other source than Data Subject, is to be treated as a data privacy incident and brought to the attention of the privacy officers.

PURPOSE LIMITATION

Campus X shall Process Personal data for the purposes for which it was originally collected (original purpose). Personal Data may be Processed for purposes different from the original purpose (secondary purpose) only if the secondary purpose is compatible and closely related with the original purpose, as understood by the Data Subject concerned.

Any change in the original Purpose of Processing will be assessed carefully and will be consulted with the responsible privacy officer, before executing any further Processing.

ACCURACY AND CONFIDENTIALITY

All Personal Data processed by Campus X must be kept accurate, complete and up-to-date as is necessary for the Purpose(s) of Processing. The personnel of Campus X shall make sure that the Personal Data obtained directly from Data Subjects or indirectly is verified against relevant documentation.

Campus X shall use appropriate technical and organizational measures to safeguard Personal Data, including when third parties are engaged in processing Personal Data on Campus X's behalf.

STORAGE LIMITATION

Campus X shall retain Personal Data in either hard-copy or electronic form (or both) only for a specific period ("Retention period"), which in any case will not be longer than:

- the time needed to accomplish the Purpose of Processing, or
- the period necessary to comply with an retention requirements under the applicable domestic legislation, or
- as advisable in light of an applicable statute of limitations.

TRANSFERS OF PERSONAL DATA

In the exercise of its business activities, Campus X may transfer data with third parties only once it makes sure that data privacy and security is guaranteed appropriately.

When transferring Personal Data to a third party country outside the EU/EEA, Campus X shall ensure that binding rules, in agreement or otherwise, require to the third party to provide adequate guarantees for the protection of Personal Data are in place.

PERSONAL DATA BREACH

All information/data breaches must be reported to the responsible privacy officer immediately as per the applicable requirements of the law.

INDIVIDUAL RIGHTS

Under Data Protection Law Data Subjects have the following Individual rights with respect to the processing of their personal data:

RIGHT TO ACCESS	The right to access to the Personal Data processed by Campus X or by a third party vendor on behalf of Campus X.
RIGHT TO RECTIFICATION	The right to have inaccurate or incomplete Personal Data amended or erased.
RIGHT TO ERASURE	The right to have Personal Data permanently removed.
RIGHT TO RESTRICTION OF PROCESSING	The right to request that Campus X temporarily or permanently suspends Processing all or some of Personal Data of the Data Subject.
RIGHT TO DATA PORTABILITY	The right to receive their Personal Data, in a structured, commonly used, machine readable and interoperable format, giving them the ability for their Personal Data to be provided to another Data Controller by themselves or the relevant Campus X. Rule: Use appropriate technical and organizational measures to safeguard Personal Data, including when third parties are engaged in processing Personal Data on Campus X's behalf.

RIGHT TO OBJECT	The right to object to the processing of their Personal Data when such processing is based on a public interest or legitimate interest grounds, or is processed for the purposes of direct marketing.
AUTOMATED DECISION MAKING	The right not to be subject to a decision based solely on automated individual decision-making, including profiling, which produces a legal effect or significantly affects them.