

STUDENT DATA PROTECTION POLICY

(Academic and enrollment management)

This document aims to inform students of the Bages University Foundation (FUB) about the processing of their personal data within the framework of the academic relationship with the institution, in compliance with the provisions of Regulation (EU) 2016/679 General Data Protection Regulation (GDPR) and Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights (LOPDGDD)

Our priority is to guarantee your privacy, treating your data lawfully, fairly and transparently.

Who is responsible for processing your personal data?

The Fundació Universitària del Bages (FUB), tax ID number G59862719, is the organisation responsible for processing your personal data.

Postal address: Avinguda Universitària, 4–6, 08242 Manresa (Barcelona)

Telephone: 938 77 41 79

Email: umanresa@umanresa.cat

Who is the contact person for the Data Protection Officer (DPO)?

If you have any questions, suggestions, complaints, or concerns regarding the processing of your personal data, you may contact our Data Protection Officer (DPO) at:

dpd@umanresa.cat

For what purposes do we process your data?

At FUB, we process your personal data for purposes directly related to your status as a student. We always apply the principle of data minimisation and process only the information strictly necessary for each purpose:

- **Admission and enrolment management:** Handling your application, assessing your academic record, and formalising your enrolment in the chosen programme.
- **Comprehensive academic management:** Administering your academic record, including grades, assessments, curricular and extracurricular placements, national and international mobility programmes, and issuing academic certificates and qualifications.
- **Administrative and financial management:** Managing tuition fee payments, scholarships, adjustments, and any other financial procedures derived from your relationship with FUB.
- **University services management:** Providing access to university services such as the virtual campus, library, student support services, and cultural and sports activities.

- **Institutional communications:** Sending you relevant academic and university updates (timetables, room changes, events, institutional announcements) through official FUB communication channels.
- **Graduate employability follow-up and alumni services:** Conducting surveys and studies on graduate employment outcomes and, if you authorise it, keeping you informed about activities and services aimed at alumni.
- **Statistical and quality-improvement purposes:** Producing aggregated or anonymised statistical reports to improve our programmes and services.

What is the legal basis that allows us to process your data?

We process your data on the following legal grounds:

- **Performance of a contract (Art. 6.1.b GDPR):** The enrolment agreement established between you and FUB legitimises most processing required to deliver educational services.
- **Compliance with a legal obligation (Art. 6.1.c GDPR):** We process data to comply with educational regulations (e.g., academic records, issuing official qualifications), tax regulations, and Social Security requirements (in the case of paid internships).
- **Performance of a task carried out in the public interest (Art. 6.1.e GDPR):** As a higher education institution, our educational activities are recognised as serving the public interest.
- **Consent of the data subject (Art. 6.1.a GDPR):** For processing not strictly necessary for academic management—such as sending promotional information about other courses or participating in specific directories—we will request your explicit consent.
- **Special category data (health or disability):** Processing is additionally legitimised by obligations relating to social protection or essential public-interest grounds aimed at guaranteeing equal opportunities and universal accessibility (Art. 9.2.b and 9.2.g GDPR).

Who will your data be shared with?

Your personal data will only be shared with third parties when strictly necessary to fulfil the purposes described or when legally required. Main recipients include:

- **Public administrations:** Ministry and regional departments of universities, Tax Agency, and Social Security.

- Other educational institutions: Within the framework of mobility programmes or collaboration agreements.
- Partner organisations: For the management of internships and participation in sports or institutional events, always under an educational cooperation agreement.
- Financial institutions: For managing tuition payments.
- Insurance companies: For mandatory school insurance or other contracted policies.
- Data processors: Service providers (e.g., academic management systems, virtual campus platforms) acting under contractual obligations to ensure data confidentiality and security.

Are international data transfers carried out?

As a general rule, we do not transfer your data outside the European Economic Area. The only exception applies to student mobility and exchange programmes, where—with *your explicit consent*—the necessary academic and identification data may be shared with the host university.

How long will your data be stored?

Your data will be kept for the period strictly necessary to fulfil the purpose for which it was collected and to determine any potential legal liabilities.

Once your academic relationship with FUB ends, your data will be blocked and stored for the legally established retention periods.

Your academic record will be kept **indefinitely** to allow the future issuing of certificates or replacement qualifications, in line with educational regulations.

1. What are your rights and how can you exercise them?

You have the right to control your personal data. You may exercise the following rights:

- Right of access: Request information about which personal data we process and how.
- Right to rectification: Request corrections to inaccurate or incomplete data.
- Right to erasure (“right to be forgotten”): Request the deletion of your data when it is no longer necessary for the purposes collected.
- Right to object: Oppose processing based on legitimate interest or direct marketing.
- Right to restriction of processing: Request the temporary suspension of data processing in specific circumstances.

- Right to data portability: Receive your data in a structured, commonly used, machine-readable format and request its transfer to another controller.

To exercise these rights, you may submit a written request free of charge, attaching a copy of your ID, via:

- Email (DPO): dpd@umanresa.cat
- Postal address: Avinguda Universitària, 4–6, 08242 Manresa (Barcelona), addressed to the Data Protection Officer.

If you believe your rights have not been properly respected, you may file a complaint with the Catalan Data Protection Authority (APDCAT).

What security measures do we apply?

FUB is committed to protecting your personal data by implementing the appropriate technical and organisational measures to ensure a level of security suited to the risks involved, guaranteeing confidentiality, integrity, and availability. These measures are regularly reviewed and updated.

Updates to this policy

This Data Protection Policy may be updated to reflect changes in legal requirements or new processing activities. Any updates will be published on our website.

Last updated: 14 January 202