



BAKU
SLAVIC
UNIVERSITY



DATA PROTECTION AND PRIVACY POLICY

*(Compliance with GDPR Principles and National
Data Protection Regulations)*



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1. PURPOSE

Baku Slavic University (BSU) is committed to protecting the privacy, confidentiality and integrity of personal data processed through its academic, administrative, research and digital operations. The University recognizes that effective data protection is fundamental to institutional governance, digital transformation, stakeholder trust and sustainable university management.

This Policy establishes the University's framework for collecting, processing, storing, accessing, sharing and protecting personal information in accordance with internationally recognized data protection principles, including the General Data Protection Regulation (GDPR), where applicable, and the Law of the Republic of Azerbaijan on Personal Data, together with other relevant national legislation governing information security and privacy.

The Policy aims to ensure lawful, transparent and accountable data processing while safeguarding the rights and freedoms of students, academic staff, administrative personnel, researchers, applicants, alumni and external stakeholders.



2. SCOPE

This Policy applies to all academic and administrative units of the University and governs all personal data processed through physical records, electronic information systems, cloud-based services, learning management systems, research databases and institutional digital platforms.

It applies equally to all University employees, students, researchers, contractors, consultants and third-party service providers who process or access personal information on behalf of BSU.

3. POLICY STATEMENT

Baku Slavic University is committed to maintaining the highest standards of privacy, information security and responsible data governance. Personal data shall be processed only for legitimate institutional purposes and in accordance with the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality.

The University ensures that appropriate organizational and technical measures are implemented to prevent unauthorized access, accidental loss, unlawful disclosure or misuse of personal information. Digital information systems are managed in accordance with institutional cybersecurity procedures and information security standards to ensure the confidentiality, availability and integrity of institutional data.

BSU further promotes a culture of responsible data management by integrating privacy considerations into digital transformation initiatives, Artificial Intelligence applications, quality assurance systems and institutional decision-making process.



4. PRINCIPLES OF DATA PROTECTION

The University processes personal information according to internationally recognized data protection principles. Personal data shall be collected only for specified and legitimate purposes, processed fairly and transparently, maintained accurately and retained only for as long as necessary to fulfil institutional responsibilities.

Access to personal information shall be restricted to authorized personnel based on operational responsibilities and institutional need. Appropriate safeguards shall be implemented to ensure confidentiality, accountability and protection against unauthorized disclosure, alteration or destruction.

Where appropriate, individuals shall have the right to access, correct or request the deletion of their personal information in accordance with applicable legislation and University procedures.

5. DIGITAL INFORMATION SECURITY

The University maintains secure digital infrastructure to support teaching, research and administration. Information security measures include secure authentication procedures, access control mechanisms, encrypted digital communications, cybersecurity monitoring, secure electronic document management and regular system maintenance.

BSU continuously strengthens its digital governance framework by implementing appropriate security technologies, conducting risk assessments and promoting cybersecurity awareness among staff and students.



6. GOVERNANCE AND RESPONSIBILITIES

The implementation of this Policy shall be coordinated by the Digitalization and Quality Assurance Center in cooperation with the Information Technology Unit, the Higher Education Center, the Internationalization and Sustainability Coordinator and other relevant administrative units.

These units are responsible for ensuring compliance with institutional data protection requirements, monitoring digital security practices, supporting awareness activities and recommending continuous improvements to information governance.

7. MONITORING AND CONTINUOUS IMPROVEMENT

Compliance with this Policy shall be reviewed periodically through institutional quality assurance and internal governance mechanisms. The University shall regularly evaluate its data protection practices, cybersecurity measures and digital governance procedures to ensure alignment with evolving legal requirements, technological developments and international best practices.

Training and awareness programmes shall be organized to strengthen the data protection culture across the University and ensure that all members of the University community understand their responsibilities regarding privacy and information security.



8. ALIGNMENT WITH INTERNATIONAL FRAMEWORKS

This Policy supports the implementation of:

- General Data Protection Regulation (GDPR) principles;
- Law of the Republic of Azerbaijan on Personal Data;
- UI GreenMetric World University Rankings – Governance & Digitalization;
- QS Sustainability Rankings – Governance;
- THE Impact Rankings – SDG 16 (Peace, Justice and Strong Institutions);
- Environmental, Social and Governance (ESG) principles relating to transparency, accountability and responsible digital governance.

9. DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

Personal Data refers to any information relating to an identified or identifiable natural person. Such information may include, but is not limited to, a person's name, identification number, date of birth, contact details, photographs, student or employee identification number, academic records, employment information, financial information, online identifiers and any other information that can directly or indirectly identify an individual.

Sensitive Personal Data refers to personal information requiring enhanced protection due to its confidential nature. This may include data relating to health, biometric information, disability status, racial or ethnic origin, religious beliefs, trade union membership or other categories of information protected under applicable legislation.



Data Subject means any individual whose personal data are collected, processed or stored by Baku Slavic University, including applicants, students, graduates, academic staff, administrative employees, researchers, visitors and external stakeholders.

Data Controller means Baku Slavic University, which determines the purposes, legal basis and means of processing personal data and is responsible for ensuring compliance with this Policy and applicable data protection legislation.

Data Processor means any internal unit or authorized third party that processes personal data on behalf of the University in accordance with documented instructions and contractual obligations.

Processing refers to any operation performed on personal data, whether by automated or manual means, including collection, recording, organization, storage, adaptation, retrieval, consultation, use, disclosure, transmission, restriction, deletion or destruction.

Consent means any freely given, specific, informed and unambiguous indication of a data subject's wishes by which the individual agrees to the processing of their personal data for one or more specified purposes.

Data Breach refers to any accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or unauthorized access to personal data processed by the University.



Information Security refers to the administrative, technical and organizational measures implemented to preserve the confidentiality, integrity and availability of University information assets.

10. DATA SUBJECT RIGHTS

Baku Slavic University recognizes and respects the rights of all individuals whose personal data are processed by the University. In accordance with applicable national legislation and internationally recognized data protection principles, data subjects are entitled to exercise the following rights:

Individuals have the right to obtain confirmation as to whether their personal data are being processed and to request access to the information held by the University. Where personal data are inaccurate or incomplete, individuals may request that such information be corrected or updated without undue delay.

Data subjects may request the deletion of personal information where its continued processing is no longer necessary, where consent has been withdrawn, or where processing is inconsistent with applicable legal requirements. Where immediate deletion is not legally possible due to statutory or institutional obligations, the University shall ensure that appropriate restrictions are applied.

Individuals may also request the restriction of processing in circumstances where the accuracy of personal data is contested, where processing is considered unlawful, or where the University no longer requires the data but the individual requires it for the establishment, exercise or defence of legal claims.



Where technically and legally feasible, individuals may request that their personal data be provided in a structured, commonly used and machine-readable format or transferred to another authorized organization.

Data subjects have the right to object to the processing of their personal data where legitimate grounds exist and may withdraw previously granted consent where processing is based on consent, without affecting the lawfulness of processing carried out before such withdrawal.

The University shall establish transparent procedures for receiving, reviewing and responding to data protection requests within reasonable timeframes and in accordance with applicable legislation.

11. COMPLAINTS AND COMPLIANCE

Any individual who believes that their personal data have been processed in violation of this Policy or applicable legislation may submit a complaint to the University's Digitalization and Quality Assurance Center or the designated institutional authority responsible for data protection.

The University shall investigate all reported concerns promptly, implement corrective measures where necessary and continuously improve its data governance framework to strengthen institutional accountability, transparency and compliance with national legislation and internationally recognized best practices.



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