

Notice for Applicant from the European Economic Area

1. What is the purpose of this document?

The Hong Kong Polytechnic University (“PolyU”, “we”) is committed to protecting the privacy and security of your personal information. This notice describes how we collect and use your personal data during the application for admission process in accordance with the General Data Protection Regulation (“GDPR”). PolyU is the “data controller” for the information that we obtain from you or others as a result of your application for admission to undergraduate or postgraduate study.

2. Glossary

In this notice, your “personal data” means any recorded information that is about you and from which you can be identified. It does not include data where your identity has been removed (anonymous data). “Processing” of your personal data means anything that we do with that information, including collection, use, storage, disclosure, deletion or retention.

3. The types of data we hold about you

The information we hold about you may include the following:

Personal details such as name, title, address, telephone number, email address, date of birth, sex and gender;

- Education and employment information;
- Visa, passport and immigration information;
- Funding and financial support information.

We may also process the following "special categories" of more sensitive personal data:

- Information about your race or ethnicity;
- Information about your health, including any disability and/or medical condition;
- Information about criminal convictions and offences (if applicable to your course).

Special category data will not be used to assess your application and will only be used in accordance with paragraph 6.

4. How do we obtain your data

Most of the information we hold comes from your application, for example, via www.polyu.edu.hk. We may also collect additional information directly from you and from other parties, such as your current or former school(s), referees, and government departments and agencies.

5. How we use your data

We process your data for the purpose of processing and assessing your application for study, and for purposes related to your application, such as assessing your eligibility for funding and your financial status. Access to your data will be provided to our staff who need to view it as part of their work in carrying out the purposes. We set out below the circumstances where it is necessary for us to process your data. We may use the same information under more than one circumstances.

- As the basis for selection for admission and scholarship;
- As the evidence for:
 - (a) verifying your identity, qualifications and academic records;
 - (b) identifying possible multiple applications and obtaining records of your current and previous studies and activities at PolyU, and other institutions;
- As data for:
 - (a) managing your application account and processing your application with PolyU;
 - (b) conducting statistical analysis, research, surveys, quality assurance and review to meet the legitimate interests of PolyU;
 - (c) facilitating communications between you and PolyU;
 - (d) sharing with government departments responsible for immigration and study visas;
 - (e) informing sponsors or benefactors of scholarships and financial support;
- Facilitating PolyU to comply with any applicable laws, regulations or court orders (in each case whether in Hong Kong or overseas), any request by government, statutory, regulatory or law enforcement authority, and valid legal process; protecting the rights of PolyU or its affiliate;
- Facilitating implementation of policies and procedures of PolyU, and monitoring their compliance; and
- Other purposes directly relating to any of the above.

If you fail to provide personal information

If you do not provide the personal data, other than those items indicated as optional, we may not be able to process your application for admission or maintain contact with you.

Change of purpose

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Please note that we may process your data without your knowledge or consent where this is required or permitted by law.

6. Special category data

Special category data require a higher level of protection. Listed below are examples of processing activities that we regularly undertake in respect of these types of data. In addition to the activities listed below, it may sometimes be necessary to process this sort of information for exceptional reasons, for example, because it is necessary to protect your vital interests or those of another person.

- **Disability**

We will process data you have volunteered about any disability in order to make any arrangements or adjustments required in relation to your application (e.g. to arrange access for interviews) and/or to monitor equal opportunities.

7. Data sharing with third parties

In case of application for admission to a programme jointly offered or collaborated by PolyU and its partner institution(s), your personal data will be shared with the partner institution(s) (whether in Hong Kong or overseas) for the above purposes.

In order to perform our legal and other responsibilities or fulfill our purposes, we may, where relevant and necessary, need to share your information with the following types of organization:

- Your referees;
- The governmental departments or agencies responsible for immigration and study visa; and
- Sponsors or benefactors of funding and financial support.

Where information is shared with third parties, we will seek to share the minimum amount.

All third-party service providers that process data on our behalf are required to take appropriate security measures to protect your data in line with our policies. We do not allow them to use your data for their own purposes. We permit them to process your data only for specified purposes and in accordance with our instructions.

8. Retention Period

We will retain your data only for as long as we need it to process your application and meet our purposes, including any relating to legal, accounting, or reporting requirements.

Upon your admission as a student of PolyU (i.e. you accepted our offer by completing the programme registration), your data provided during application will become part of your official student records. The student records will be used by departments and offices of PolyU for all purposes and activities related to your studies and activities as specified in the Personal Information Collection Statement for Students [<https://www.polyu.edu.hk/ar/pics/>]. PolyU will manage the student information system strictly in accordance with the laws and regulations of Hong Kong.

In case your application is not accepted or you do not accept our offer, PolyU will either irreversibly anonymize (and the anonymized information will be retained) or securely destroy your data according to the prevailing policy and procedures.

9. Your rights

Under certain circumstances, by law you have the right to:

- **Request access** to your data (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction** of your data. This enables you to ask us to correct any incomplete or inaccurate data we hold about you.
- **Request erasure** of your data. This enables you to ask us to delete or remove your data in certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing** of your data where we are relying on our legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object

to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.

- **Request the restriction of processing** of your data. This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your data to another party.

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. Where you have consented to the processing (for example, by asking us to send you certain types of communication), you can withdraw your consent at any time, by emailing us at the respective email addresses set out in this paragraph. Upon your withdrawal of the consent, we will stop the processing as soon as we can. The withdrawal will not invalidate past processing.

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please send email to:

Applicant for Undergraduate studies or Taught Postgraduate studies: Academic Registry at ar.dept@polyu.edu.hk

Applicant for Research Postgraduate studies: Graduate School at gs.admission@polyu.edu.hk

We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

10. Keeping your data up-to-date

It is important that the data we hold about you is accurate and current. You can access, amend and delete your data yourself until the point at which you submit your application to PolyU. Please keep us informed of any changes after you submit your application.

11. Updates

We reserve the right to update these notes at any time, and will seek to inform you of substantial updates. We may also notify you in other ways from time to time about the processing of your personal data.

The Hong Kong Polytechnic University
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