



Swiss International
Institute Lausanne

PRIVACY POLICY

Swiss International Institute Lausanne – SIIL

By registering on the SIIL and purchasing Study Programmes the student agrees to the terms of the Privacy Policy

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Owner:	Data Protection Office
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I INTRODUCTION

This Privacy Policy (hereinafter referred to as the "Policy") establishes the rules for the use by the organization of Swiss International Institute Lausanne – SIIL (hereinafter referred to as the "Administrator") of personal information received from users of the website <https://siil.ch> (hereinafter referred to as "Users"). The text of the Policy is available to Users on the Internet at the network address <https://siil.ch/policies> Using the Application means that the User agrees to the Policy and its terms. If the User does not agree with the terms of this Privacy Policy, he/she is obliged to stop using the website. The unconditional acceptance of this Privacy Policy is the beginning of the use of the website by the User.

II INFORMATION RECEIVED BY ADMINISTRATOR

The Administrator collects, accesses and uses the User's personal data, technical, billing and other information related to the User for the purposes defined by the Policy.

The User's personal data means the following information that the User provides to the Administrator when using the Application:

- IP address;
- Type of device operating system;
- Unique identifiers of computer equipment and/or device.

The User's personal data also means the following information that the User provides to the Administrator when accessing the Administrator's website, registering and/or authorizing on the Administrator's website and using the Administrator's website:

- Surname, First name, Patronymic;
- Image;
- Email address;
- Contact phone number;
- Results of Educational programs;
- Messages, comments;
- Pages of the Administrator's website visited by the User;
- Data about the Internet browser;
- Data of billing information about User actions, including facts, time, recipients of User messages.

In case of visiting to the Administrator's website, registering and/or logging in on the Administrator's website, using the Administrator's website and submitting an application on the Administrator's website for the purchase of a paid Educational program, the Administrator gets access to the User's payment information posted by the User in the application for the purchase of paid Educational programs, namely, bank account details, or account details, open with e-money operators.

The Administrator uses cookies to save the User's credentials (email address and password) on the Administrator's website, which the User can access if the User's software and device allow it, and if the User has set the appropriate settings of the device and software on the device.

III PERSONAL DATA

Processing of the User's personal data means recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of the User's personal data.

The User gives his consent to the Administrator to process the User's personal data provided during registration and /or authorization and use of the Administrator's website, including the transfer of such personal data to third parties pursuant to agreements between the Administrator and the User, even when such transfer is carried out on the territory of other states (cross-border transfer).

The User, free of charge, gives his consent to the use of his image as a photo of the User (avatar) by the Administrator for the purpose of processing his personal data when the User uses the Administrator's website, including through the Application. The User undertakes to refrain from using images of third parties as a User's photo (avatar) for the same purposes and in the same way.

The processing of personal data takes place in an automated mode, except in cases when a decision may be made concerning the User affecting his rights and interests and/or having legal consequences for him. The Administrator's employees who process personal data in such cases undertake not to disclose personal data that became known to them during such processing.

The User's personal data is processed by the Administrator using various databases.

IV LIMITATION OF LIABILITY

Using the Administrator's website, the User enters into an agreement with the Administrator on the use of the Administrator's website, the text of which is posted on such a website, and which also regulates the procedure for using the User's personal information when using the Administrator's website.

By going to the Administrator's website, registering and/or logging in, entering their personal data, sending messages and adding comments on the Administrator's website, on the basis of an agreement between the User and the Administrator on the use of the

Administrator's website, the User voluntarily makes the personal data provided to the Administrator publicly available.

The Administrator's website is not a publicly available source of personal data. At the same time, if the User performs certain actions, his personal data may become available to an indefinite circle of persons, to which the User hereby gives his consent.

The User agrees to receive newsletters and promotional materials from the Administrator, or from other persons on behalf of the Administrator, to the email address and contact phone number specified by the User when registering on the Administrator's website.

V PURPOSE OF USING THE INFORMATION PROVIDED BY THE USER

The information provided by the User is used by the Administrator solely for the purposes of:

- Fulfillment by the Administrator of obligations to the User under agreements between the Administrator and the User on the use of the Administrator's website;
- Establishing and maintaining communication with the User;
- Sending informational and other messages to the User's e-mail address;
- Improving the quality of service and upgrading the Administrator's website;
- Registration and identification of the User on the Administrator's website and management of the User account on the Administrator's website;
- Administration of justice, if the Administrator receives a corresponding request from the authorized bodies.

The Administrator reserves the right to verify the accuracy of the information provided by Users, the legal capacity of Users.

VI MEASURES TAKEN TO PROTECT THE INFORMATION PROVIDED BY THE USER

The Administrator takes necessary and sufficient legal, organizational and technical measures to protect the information provided by Users from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with it by third parties by restricting access to such information on the Administrator's website, employees and partners of the Administrator, third parties (except for the provision by the Administrator of information necessary for the Administrator to fulfill obligations to the User), as well as imposing sanctions on such persons for violating the confidentiality regime with respect to such data.

The Administrator guarantees that the information provided by Users is not combined with statistical data, is not provided to third parties and is not disclosed, except as provided in the Policy.

The Administrator does not sell or transmit User information separately. Such information can be transmitted only in case of partial or complete reorganization of the Administrator.

The Administrator takes technical and organizational measures to provide the User with the opportunity to access the information provided by him, edit such information, determine the settings for third-party access to such information.

VII ADMINISTRATOR RIGHTS

The Administrator has the right to conduct statistical and other research based on depersonalized information provided by the User. The Administrator has the right to provide access to such research to third parties for the purpose of advertising targeting. The User gives his consent to such research and to receive targeted advertising by adopting the Policy. The User may withdraw such consent at any time by contacting the Administrator at the address indicated on the corresponding page of the Administrator's website. The User can also independently, if there is a technical possibility on the User's device or in the software on the User's device, prohibit the device or software from transmitting information through the Administrator's website necessary for advertising targeting.

The Administrator has the right to provide information about Users to state bodies within the framework of a judicial process or as part of an investigation on the basis of a court decision, a compulsory request or in the order of cooperation, as well as in other cases provided for by law.

The Administrator has the right to provide information about Users to third parties in order to identify and prevent fraudulent actions, to eliminate technical problems or security problems.

The Administrator has the right to provide access to User information to third parties, including other users of the Administrator's website, if the User has given his consent to this, as well as if such transfer is necessary for the Administrator to fulfill obligations to the User under agreements concluded with the User.

VIII USER RIGHTS

By posting information about himself on the Administrator's website, the User can make it publicly available, while the User understands that the information can be indexed in search engines and accepts the associated risks of disclosure of information related to personal, family and other secrets.

The User may at any time delete or change the information provided by the User by performing the necessary actions on the Administrator's website, and in the absence of such an opportunity - by contacting the Administrator at the email address info@siil.ch

At the same time, the User understands that the Administrator has the right to continue using such information in cases permitted by law. Consent to receive newsletters and promotional materials may be revoked by the User at any time by sending the Administrator a corresponding notification in the same way.

IX NEW EDITION

The Administrator reserves the right to make changes to the Policy. The User is obliged to familiarize himself with the text of the Policy every time he uses the Administrator's website.

The new version of the Policy comes into force from the moment it is posted on the Administrator's website. Continued use of the Administrator's website after the publication of the new version of the Policy, respectively, on the Administrator's website means acceptance of the Policy and its terms by the User.

The User should not use the Administrator's website in case of disagreement with the terms of the Policy.

X EXCLUSION OF CONTRADICTION

In the event that the agreements between the Administrator and the User contain provisions on the use of personal information and/or personal data of the User, the provisions of the Policy and such agreements shall apply in the part that does not contradict the Policy.

XI FURTHER INFORMATION

Specific queries on this policy or requests should be directed to the Data Protection Office (email: a.isanina@siil.ch), who will progress as appropriate.

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