

Navoi State University DATA PROTECTION POLICY (Policy on Processing and Protection of Personal Data)

1. Introduction and Purpose

Navoi State University (NSU) considers the protection of personal data of students, academic and administrative staff, graduates, applicants, partners, and other stakeholders as one of its strategic priorities.

This Policy is an integral part of the university's **Information Transparency Management System** and is based on the following legal acts and standards:

- Law of the Republic of Uzbekistan "On Personal Data" (No. ORQ-547 dated July 2, 2019) (<https://lex.uz/docs/-4396419>) ;
- Order of the Minister of Higher Education, Science and Innovation of the Republic of Uzbekistan No. 73 dated February 24, 2025 "On the Organisation of the Activities of the Registrar's Office in Higher Education Institutions" (<https://lex.uz/uz/docs/-7499721>) ;
- Presidential Decree No. PQ-378 dated October 31, 2024 (<https://lex.uz/uz/docs/-7182193>);
- National requirements for the HEMIS (Higher Education Management Information System) platform (<https://hemis.uz/>) ;
- International accreditation standards and GreenMetric World University Rankings criteria.

Main Objectives:

- To ensure lawful, fair, transparent, purpose-oriented, and secure processing of personal data;
- To support the university's quality assurance, evidence-based decision-making, and continuous improvement processes;
- To strengthen trust by protecting the privacy rights of students and staff;
- To minimise the risks of personal data breaches.

2. Scope of Application

This Policy applies to:

- All personal data collected, stored, and processed by the University in electronic (HEMIS platform, Google Forms, university portal) and physical (paper) formats;
- All structural units of the University (Registrar's Office, Human Resources Department, faculties, departments, archives, Career Center, etc.);
- All University employees, students, contractors, partner organizations, and third parties.

3. Key Definitions

- **Personal Data** — Any information relating to an identified or identifiable natural person (data subject).
- **Special Categories of Personal Data** — Data revealing racial or ethnic origin, religious or philosophical beliefs, health status, biometric data, etc.
- **Processing** — Any operation or set of operations performed on personal data (collection, recording, storage, adaptation, use, disclosure, erasure, etc.).
- **Data Controller (Operator)** — Navoi State University.
- **Data Subject** — Any natural person whose personal data is being processed.

4. Principles of Personal Data Processing

The University strictly adheres to the following principles:

1. Lawfulness, fairness, and transparency;
2. Purpose limitation;
3. Data minimization;
4. Accuracy and relevance;
5. Storage limitation;
6. Integrity, confidentiality, and security;
7. Accountability.

5. Types of Data, Collection, and Processing Purposes

5.1. Student Data (processed by the Registrar's Office):

- Personal and demographic information (age, gender, region, international students);
- Admission records, academic progress, grades, retention, dropout rates, and graduation data;
- Survey results (study-unit evaluations and end-of-programme feedback).

5.2. Staff Data (processed by the Human Resources Department):

- Employment records, qualifications, academic degrees, workload, professional development, and salary information.

5.3. Other Data:

- Graduate employment tracking;
- Key Performance Indicators (KPIs), resource utilization statistics.

Purposes of Processing:

- Management and quality improvement of educational processes;
- Preparation of state statistical reports (stat.uz, HEMIS);
- Accreditation, internal audits, and quality assurance;
- Assessment of student and staff satisfaction.

6. Rights of Data Subjects and Procedure for Exercising Them

Every data subject has the following rights:

- Right to access their personal data and obtain a copy;
- Right to rectification of inaccurate or incomplete data;
- Right to erasure ("right to be forgotten");
- Right to restriction of processing;
- Right to object to processing;
- Right to withdraw consent at any time;
- Right to challenge automated decisions;
- Right to lodge a complaint.

How to submit a request: In writing or through the HEMIS portal to the Registrar's Office. Response time — within 10 working days (subject to legal deadlines).

7. Security and Protection Measures

7.1. Technical Measures:

- Modern security mechanisms of the HEMIS platform;
- Strong password policy and two-factor authentication;
- Data encryption and regular backups.

7.2. Organizational Measures:

- Every employee handling personal data must sign an **Ethical Declaration on Personal Data Processing**;
- Role-based access control (RBAC);
- Regular monitoring and internal audits.

7.3. Physical Measures:

- Physical student files are stored in locked filing cabinets in the Registrar's Back Office;
- After graduation, files are transferred to the University Archive and kept for at least 10 years.

8. Data Sharing, Third Parties, and International Transfers

- Personal data is shared only on lawful grounds and under data processing agreements.
- Sharing with state authorities (Ministry, Statistics Agency, mehnat.uz, d-arxiv.edu.uz) is carried out in strict compliance with procedures.
- International transfers are permitted only when appropriate safeguards are in place.

9. Data Retention and Archiving

- Active student and staff records are maintained in HEMIS during the period of study or employment.
- After graduation or contract termination — retained for a minimum of **10 years** in the University Archive.
- Anonymized data may be retained longer for statistical and quality improvement purposes.
- Data is securely deleted or anonymized after the retention period expires.

10. Personal Data Breach Management

1. Immediate detection and notification to the Registrar's Office and the Rector.
2. Rapid investigation and risk assessment.
3. Notification of affected individuals and competent authorities where required.
4. Implementation of corrective measures and documentation of the incident.

11. Responsibilities

- **Rector** — overall accountability.
- **Data Protection Officer** — day-to-day oversight and compliance monitoring.
- **Registrar's Office (Back Office)** — primary responsibility for student data.
- **Human Resources Department** — responsibility for staff data.
- **All Employees** — compliance with this Policy and immediate reporting of breaches.

12. Training, Awareness, and Monitoring

- Regular training sessions for all staff (at least once a year).
- Information provided to students during orientation and via the university portal.
- Annual evaluation of the Policy's effectiveness through internal audits.

13. Policy Review and Update

This Policy is reviewed annually or upon changes in legislation and is published on the official university website (nsuni.uz) for transparency.

14. Additional Provisions

- Website cookies and online tracking are governed by a separate **Website Privacy Notice**.
- **Data Protection Impact Assessment (DPIA)** is conducted for high-risk processing activities.
- A Record of Processing Activities is maintained.

Contact Information Data Protection Officer / Registrar's Office Navoi State University

Telephone: +99897-323-50-00

Email: internationaloffice@nspi.uz

Address: 45 Ibn Sino Street, Navoi, Uzbekistan

Annexes:

1. Sample Ethical Declaration for Employees.
2. Sample Data Subject Request Form.
3. Sample Consent Form.
4. Personal Data Breach Report Form.

Related Documents:

- Student Feedback Policy
- Data Collection Policy
- Evaluation Regulations
- Internal Audit and Monitoring Reports
- Registrar's Office Regulations

This Policy fully meets the requirements of Navoi State University's quality assurance system, international rankings (including GreenMetric), and accreditation standards. It ensures transparency, accountability, and high standards of personal data protection.

Approved by: Head of the Registrar's Office,
Navoi State University

Dilorom Shamsiyeva



Effective Date: 01.10.2025

Contact: Navoi State University Registrar's Office