	EPOKA UNIVERSITY DATA PROTECTION POLICY				
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Article 1: Introduction

This Data Protection Policy outlines the internal measures that EPOKA University implements to ensure the secure and lawful processing, storage, and protection of personal data. The policy aligns with Law No. 124/2024 on the Protection of Personal Data and incorporates relevant principles from the EU's General Data Protection Regulation (GDPR).¹

Article 2: Purpose and Scope

The policy applies to all organizational units, employees, and collaborators at EPOKA University who are involved in the processing of personal data, regardless of the data format (electronic, paper-based, or other).

Article 3: Roles and Responsibilities

- **Data Protection Officer (DPO):** Ensures compliance with data protection laws and provides guidance on best practices.
- **Data Controllers:** Determine the purpose and means of personal data processing.
- **Data Processors:** Process personal data on behalf of the data controller.
- **All Staff:** Must comply with the provisions of this policy and report any data protection concerns to the DPO.

Article 4: Principles for Data Processing

EPOKA University adheres to the following principles when processing personal data:


- **Lawfulness, Fairness, and Transparency:** Data is processed lawfully and transparently.
- **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes.
- **Data Minimization:** Only data necessary for processing purposes is collected.
- **Accuracy:** Data is kept accurate and up to date.
- **Storage Limitation:** Data is retained only as long as necessary for the purposes for which it was collected.

¹ This law is fully aligned with:

- Regulation (EU) No. 679/2016 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, published in the Official Journal of the European Union, L series, No. 119/1, dated 4 May 2016;

- Directive (EU) No. 680/2016 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA, CELEX number 32016L0680, published in the Official Journal of the European Union, L series, No. 119, dated 4 May 2016, p. 89.

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ICT Coordination Office	Rectorate	Academic Senate

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- **Integrity and Confidentiality:** Data is processed securely to prevent unauthorized access, loss, or damage.

- **Accountability:** EPOKA University is responsible for demonstrating compliance with data protection principles.

Article 5: Data Security Measures

EPOKA University implements the following measures to protect personal data:

Technical Measures:

- Data encryption and pseudonymization
- Firewalls and secure networks
- Access control systems

Organizational Measures:

- Regular training for staff on data protection best practices
- Limited access to personal data based on roles and responsibilities
- Secure storage of physical and digital data

Article 6: Data Breach Response Plan

In the event of a data breach:

- The breach must be reported immediately to the DPO.
- The DPO will assess the breach and notify the relevant authorities within 72 hours if required.
- Measures will be taken to contain and mitigate the impact of the breach.

Article 7: Data Retention and Disposal

- Personal data is retained for the period necessary to fulfill processing purposes.
- Data that is no longer required is securely deleted or destroyed.
- Archiving measures are implemented for historical, research, or statistical purposes in compliance with legal requirements.


Article 8: Third-Party Data Processors

EPOKA University ensures that third-party data processors comply with this policy and relevant data protection laws by:

- Signing data processing agreements
- Conducting regular audits to assess compliance

Article 9: International Data Transfers

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Data transfers outside Albania are permitted only when appropriate safeguards are in place, such as:

- Standard contractual clauses approved by the Data Protection Commissioner
- Adequate levels of data protection in the recipient country

Article 10: Staff Training and Awareness

- Regular training sessions on data protection for all university staff.
- Awareness campaigns to inform employees of their data protection responsibilities.

Article 11: Data Subject Rights Handling

EPOKA University follows internal procedures to ensure timely and lawful responses to data subject requests, including:

- Access to personal data
- Rectification of inaccurate data
- Erasure of personal data
- Restriction and portability of data

Article 12: Monitoring and Review

- This policy will be reviewed annually or whenever significant legal or operational changes occur.
- The review process is led by the DPO and the ICT Coordination Office.

Article 13: Policy Enforcement

Non-compliance with this policy may result in disciplinary action and legal consequences as per applicable laws.

Article 14: Contact Information

For questions or concerns regarding this policy, please contact:

- Data Protection Officer: info@epoka.edu.al
- Phone: +355 4 2232 086
- Address: EPOKA University, St. Tirana - Rinas, Building E, Postal Code 1032 Vore, Tirana / Albania

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