



**INTEGRATED  
QUALIFICATIONS  
SYSTEM**

**Educational Research Institute - National Research Institute**

# How do we protect your data in My Portfolio?



European Funds  
for Social Development



Republic  
of Poland

Co-funded by the  
European Union



EDUCATIONAL  
RESEARCH INSTITUTE  
National Research Institute

## Basic data protection rules in My Portfolio

The administrator of the My Portfolio application is the Educational Research Institute – National Research Institute (IBE PIB).

**In protecting personal data, we are guided by the following principles:**

❖ **Transparency** – we want users to know the functionality of the application and what happens to their data when they use it; we have prepared documents to this end:

- **Regulations for providing services by electronic means for the My Portfolio tool**, in which we have described in detail which services are provided within the application,

- **Privacy Policy**, in which we inform you about, among other things:

1. What kind of data we collect about you,
2. What happens to the data when you use the application,
3. To whom and on what terms the data are made available,
4. How you can exercise your rights under the GDPR.

## Basic data protection rules in My Portfolio (cont.)

- ❖ **Minimisation** – the system collects only as much data as is necessary. To set up an account, the user provides an email address and password, first name and surname, and age (and, in the case of professional accounts, name and type of institution); for the rest, the user decides for themselves whether and which data they include in the application.
- ❖ **Restriction of the purpose of processing** – we use your data only to the extent necessary to enable the functionality of the application. The data are not used for marketing activities; no profiling or automated decision-making takes place within the application.
- ❖ **Processing time** – we do not keep data longer than necessary.

## How do we ensure control over the User's own data?

The User decides for themselves:

- ❖ which personal data is entered in the portfolio,
- ❖ which documents are placed in folders,
- ❖ with whom the User shares their account or its selected elements (folders, CVs, Development Plans).

The User who shares their data is informed of this at all times through a displayed message. This way, the User knows which folders have been shared and who can see them.

The User can at any time:

- ❖ update their details,
- ❖ stop sharing their account or its selected elements (folders, CVs, Development Plans),
- ❖ delete their account.

## Sharing data and contact with a counsellor, employer or awarding body representative

The User chooses whether to work on the portfolio alone or with a counsellor.

In order to share a My Portfolio account or its selected elements (folders, CVs, Development Plans), the User must enter the e-mail address of a counsellor who has a professional account in My Portfolio.

Counsellors do not have access to User data unless the User has initiated such contact.

The counsellor loses access to such data when the User:

- ❖ no longer shares their My Portfolio account or its selected elements with the counsellor,
- ❖ deletes the account from the application.

The User also has the option to share their data with employers or awarding body representatives who have a professional account in My Portfolio as described above.

## User's rights

Under the GDPR, the application User has:

- ❖ the right of access to their data – by viewing the data collected on their profile,
- ❖ the right to data rectification – by editing the data and entering new data,
- ❖ the right to data erasure – by erasing selected data or deleting their account.

In case of questions or concerns, the User can contact IBE PIB's Data Protection Officer ([iod@ibe.edu.pl](mailto:iod@ibe.edu.pl)).

## Protection of the User account

Account access and password:

- ❖ the application prevents the same password from being used again,
- ❖ access to the account requires a strong password (12 characters, including at least one upper case letter, one lower case letter and one number or special character),
- ❖ passwords are stored as hashes (i.e., they are encrypted),
- ❖ the system has a mechanism for blocking the account after 5 unsuccessful logins (in order to unblock the account, the User must contact the Application Administrator – IBE PIB),
- ❖ inactive accounts are deleted (no account activity for 3 years). This means that if a User has not logged in for 3 years, their account will be automatically deleted.

## Protection against viruses and malware

Various tools are used within the application to prevent unauthorised access and protect against malware, such as:

- ❖ vulnerability scanner (checks the security level of the IT infrastructure),
- ❖ event monitoring system (recognises suspicious network activity),
- ❖ antivirus security,
- ❖ analysis and protection of connections to websites.

Due to the multitude of users and documents entered into the application, we have introduced a mechanism to scan files uploaded by users for viruses and malware.

## Other security measures

Data protection and information security audits – data protection and information security audits are systematically performed at IBE PIB, recommendations are implemented:

- ❖ Risk monitoring – measures appropriate to the level of the identified risk are implemented,
- ❖ Data storage – data are stored in a secure server within the EU.

## Data protection and information security system at IBE PIB as administrator of the My Portfolio application

Data protection policy – to ensure security and compliance with data protection requirements, a number of procedures have been developed and implemented, whose compliance is monitored on an ongoing basis.

- ❖ Training – staff training and awareness-raising activities on data protection and cyber security is systematically conducted.
- ❖ Access to data – only authorised staff have access to data. Each employee is obliged to maintain confidentiality even after termination of employment.
- ❖ Collaboration with other entities – before beginning to work with other entities, we assess whether the entity meets the security guarantees for personal data.



## About the project:

The Educational Research Institute – National Research Institute is implementing a project co-financed by European Funds: “Supporting the Further Development of the Integrated Qualifications System in Poland (IQS6)”.

FERS.01.08-IP.05-0001/23

The aim of the project is to increase the effectiveness of the Integrated Qualifications System and to further develop it as one of the state policy tools supporting lifelong learning at national, regional and local levels.

Project information: <https://kwalifikacje.edu.pl/o-projekcie-2/>

#EUFunds



European Funds  
for Social Development



Republic  
of Poland

Co-funded by the  
European Union



EDUCATIONAL  
RESEARCH INSTITUTE  
National Research Institute