

UNIVERSITY OF PARDUBICE	
Directive No. 5/2026	
Subject:	Implementation of Business Intelligence at the University of Pardubice
Applicable to:	All units of the University
Effective Date:	1 May 2026
Reference Number:	UPCE/opo/00004305/2026
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Article 1 Introductory Provisions

1. The purpose of this Directive is to establish the conditions under which Business Intelligence tools are developed and used at the University of Pardubice (hereinafter the “University”) to support strategic management.
2. These tools rely on a data foundation created from data originating in individual operational information systems. Such data are integrated and centrally stored in the staging layer of the data warehouse and subsequently made available to individual data warehouses, namely the data warehouse for statistical purposes, the data warehouse for the evaluation of study programmes, and the data warehouse for employee evaluation, always in accordance with this internal regulation.
3. The staging layer of the data warehouse may process data that constitute personal data. This Directive implements the requirements set out in Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation, hereinafter the “GDPR”).
4. The use of data, including personal data, from the staging layer within individual data warehouses is permitted only in compliance with the conditions arising from the GDPR.

Article 2 Definitions

For the purposes of this Directive:

1. “**Business Intelligence**” (hereinafter “BI”) means all tools supporting analytical, planning and decision-making activities of the University.
2. “**Data warehouse**” means a repository where data from across the University are integrated from various operational systems and may be enriched with additional dimensions, such as time.
3. “**Data pipelines**” mean tools that extract a specified subset of data from operational systems and transfer it to the data warehouse; this process may include transformation, cleansing and enrichment of the data.
4. “**Pseudonymisation**” means the processing of personal data in such a way that they can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and subject to

technical and organisational measures to ensure that the data are not attributed to an identified or identifiable natural person.

5. “*Statistical purposes*” mean processing under the conditions defined in recital 162 of the GDPR.

Article 3 Business Intelligence

1. BI includes data pipelines, data warehouses, records of access rights and permissions, and analytical and reporting tools.
2. The general purpose of BI is to support the day-to-day work of all employees and the strategic decision-making of the University’s management, the management of its faculties, and selected central university units and Rectorate units.
3. Data transfer from individual data sources (typically operational information systems of the University) is ensured through data pipelines.
4. The use of data from BI tools is permitted only in accordance with this Directive, which defines the rules for their use and, in the case of personal data, specifies, inter alia, the purpose of processing and its compatibility with the original purpose for which the data were collected, as well as the legal basis for such processing.
5. BI components and outputs shall not be used for purposes other than those permitted by this Directive.
6. Analytical and reporting tools may also analyse and visualise data stored outside the data warehouse; such cases are not governed by this Directive.
7. The administration and technical operation of data warehouses and data pipelines are ensured by the Analytics Office (hereinafter the “AO”) within the Centre for Information Technology and Services.

Article 4 Staging Layer of the Data Warehouse

1. The purpose and legal basis for processing personal data in the staging layer of the data warehouse are derived from the purpose and legal basis applicable to processing in individual data warehouses.
2. Personal data may be retained in the staging layer for a longer period than in the source operational system, including after their deletion from the source system. However, such data may only be used for processing in the statistical data warehouse or for processing for which a separate legal basis and purpose can be established.

Article 5 Data Warehouse for Statistical Purposes

1. BI tools process data, including personal data, contained in the staging layer for statistical purposes, and the outputs of such processing are made available in the statistical data warehouse.

2. The use of data from the staging layer in the statistical data warehouse constitutes processing for statistical purposes within the meaning of Article 89(1) of the GDPR and is compatible with the original purposes (Article 5(1)(b) GDPR). Such processing is also governed by Section 16 of Act No. 110/2019 Sb., on the Processing of Personal Data, including the obligation to adopt, to the greatest extent possible, the safeguards defined therein.
3. All data constituting personal data in the statistical data warehouse shall be stored in anonymised or pseudonymised form. Likewise, all outputs from the statistical data warehouse shall be anonymised or pseudonymised.
4. Anonymisation and pseudonymisation are ensured by technical means of BI tools.
5. Outputs from the statistical data warehouse shall not be used for decision-making concerning the rights and obligations of specific individuals.

Article 6

Data Warehouse for the Evaluation of Study Programmes

1. The data warehouse for the evaluation of study programmes contains information used in the preparation and evaluation of study programmes, in particular data on programme leaders and teaching staff involved in individual study programmes and courses, such as qualification data of teaching staff participating in teaching, information on courses taught by individual teaching staff, information on doctoral theses supervised by teaching staff, and student evaluations of courses. The primary source of such data is the University information system IS STAG.
2. The legal basis for processing personal data in this data warehouse is the performance of a legal obligation of the controller. In the area of study programme development and delivery, such processing is based on Section 6(1)(c) and Section 24(2)(a) of Act No. 111/1998 Sb., on Higher Education Institutions, as amended. The evaluation of study programmes forms part of the internal evaluation of educational and related creative activities under Section 77a et seq. of that Act. This processing is also based on Section 5 of Act No. 110/2019 Sb.
3. The purpose of processing personal data contained in this data warehouse is the preparation and evaluation of study programmes delivered at the University, with such personal data serving as input for these processes. This constitutes one of the original purposes for which the personal data were collected and therefore does not represent processing for a new purpose.
4. The retention period for personal data in the data warehouse for the evaluation of study programmes is 45 years.

Article 7

Data Warehouse for Employee Evaluation

1. The data warehouse for employee evaluation contains personal data relating in particular to teaching, publication activity and project activities of employees. These data may be used by supervising officers when evaluating their subordinate employees.
2. Employee evaluation is a periodic activity with a legal basis in Section 302(a) of Act No. 262/2006 Sb., the Labour Code, as amended (hereinafter the “Labour Code”), and is linked to remuneration, professional development and employee care. The legal basis

for processing personal data in this data warehouse is therefore the performance of a legal obligation within the meaning of Article 6(1)(c) of the GDPR, specifically Section 302(a) of the Labour Code.

3. The purpose of processing personal data in this data warehouse is the evaluation of subordinate employees by supervising officers. These data serve as input for the evaluation process and therefore do not constitute processing for a new purpose.
4. The retention period for personal data in the data warehouse for employee evaluation is 45 years.

Article 8 **User Access to BI**

1. There are two types of user access to BI: organisational access and individual access.
2. Organisational access is granted automatically based on the user's organisational position within the University. It remains valid only for as long as the user holds a position that entitles them to such access.
3. Individual access is granted on the basis of an application.
4. Applications for individual access shall be submitted by the supervising officer of the employee requesting access. Applications are submitted to the Analytics Office (AO) in the manner and scope defined by the AO.
5. Applications for individual access to BI outputs are subject to approval by the person responsible for personal data processing pursuant to Article 4(1)–(4) of Directive No. 2/2018 of the University of Pardubice (Rules for the Processing and Protection of Personal Data at the University of Pardubice).
6. Individual access is granted for a fixed period, not exceeding one (1) year. Upon expiry, a new application must be submitted if access is to be continued.
7. Users access BI tools via their domain accounts.
8. Personal data accessible through individual data warehouses may be used solely for the purposes defined in this Directive.
9. The use of BI functionalities by users may be subject to audit and statistical evaluation.
10. Audit logs shall be retained for a maximum period of two (2) years.

Article 9 **User Access to the Data Warehouse for Statistical Purposes**

1. Organisational access to the statistical data warehouse is divided into basic organisational access and extended organisational access.
2. Basic organisational access is granted to all employees in an employment relationship whose job roles fall within Group 1 or 2 under the Internal Salary Regulations of the University of Pardubice.
3. Extended organisational access is granted to:
 - a. the Rector, Vice-Rectors and the Bursar,
 - b. Deans, Vice-Deans and Secretaries of faculties,

- c. the Director of Accommodation and Dining Services Division, the Director of the Centre for Information Technology and Services, the Head of the Education Office, the Head of the Technical Division, the Head of the Legal and Organisational Office, the Head of the Organisational Section, the Data Protection Officer, the Head of the University Library, and staff of the Research and Creative Activities Section,
- d. the Head of the Economic Division.

Article 10

Scope of Data Access in the Statistical Data Warehouse

1. Users with basic organisational access under Article 9(2) may use outputs (reports) for statistical purposes in the form of aggregated data, in particular in the areas of study, research and development, human resources and data used for annual activity reports.
2. Users with extended organisational access under Article 9(3)(a)–(d) may use reports within the scope of paragraph 1 and additional reports relating to the implementation of the strategic plan.
3. Financial reports covering the entire University may be used by users under Article 9(3)(a) and (d).
4. Faculty-level financial reports may be used by users under Article 9(3)(b).
5. Financial reports relating to individual Rectorate professional units may be used by users under Article 9(3)(a) and (d), as well as by supervising officers of the respective unit under point (c).
6. The content of individual reports in the statistical data warehouse is determined by the AO, primarily based on the technical capabilities of BI tools, while also taking into account the requirements of the University and faculty management.

Article 11

User Access to the Data Warehouse for the Evaluation of Study Programmes

1. Organisational access to this data warehouse is granted to:
 - a. members of the Internal Evaluation Board, members of its expert committees and its Secretary,
 - b. programme leaders and specialisation leaders,
 - c. persons referred to in Article 9(3).
2. Persons under paragraph 1(b) use reports within the scope of the study programmes for which they are responsible.

Article 12

User Access to the Data Warehouse for Employee Evaluation

1. Organisational access to this data warehouse is granted to:
 - a. employees assigned to units for which evaluation datasets are prepared,
 - b. supervising officers of the employees referred to in point (a),

- c. Deans and Vice-Deans of faculties whose employees are subject to evaluation,
 - d. the Rector and relevant Vice-Rectors in the case of employees of Rectorate or central university units.
2. Employees under paragraph 1(a) use reports only in relation to their own data.

Article 13
Administrator Access to BI

1. Administrators have full access to BI databases.
2. Administrators access BI databases using individual credentials separate from their domain accounts.

Article 14
Final Provisions

1. Directive No. 5/2022 on the Implementation of Business Intelligence at the University of Pardubice dated 1 April 2022 is hereby repealed.
2. This Directive becomes valid on the date of signature and effective on 1 May 2026.

In Pardubice, 26 March 2026

prof. Ing. Libor Čapek, Ph.D.
Rector