Privacy Statement of Honours College of the University of Groningen

1. Introduction

Honours College (hereinafter referred to as the HC) is a faculty of the University of Groningen (hereinafter referred to as UG). The HC aims to handle your personal data with the utmost care at all times. The HC is legally responsible in this respect and takes this responsibility seriously.

All students, staff members, research members, and other individuals associated with the HC must be able to trust that their personal data will be lawfully processed and adequately protected by the HC. The HC is therefore transparent about what it does with personal data and will assume responsibility, including when mistakes are made. The UG allows individuals to inspect and correct their data. Their complaints are taken seriously and treated with the utmost care.

This Privacy Statement is designed to inform you about how the HC processes information about you and about your rights. This Privacy Statement has been drawn up in conjunction with the privacy policy of the UG.

Read more about your <u>privacy</u> at the UG (currently only accessible to students and staff). Read more about <u>cookies</u> when using this website.

The General Privacy Statement of the University of Groningen can be found here.

2. Contact information of responsible party

If you have any questions or requests regarding the processing of your personal data, please contact:

University of Groningen

Postal address: P.O. Box 72, 9700 AB Groningen, the Netherlands

T.a.v. Central Privacy Desk Email: <u>privacy@rug.nl</u>

Your message will always be shared with the Data Protection Officer of the UG. You can also contact the Data Protection Officer directly at FG@rug.nl.

3. Status of this Privacy Statement

This document is the Privacy Statement of the University Services Department (the HC). This Privacy Statement outlines what kind of personal data the HC processes and for what purposes. The UG keeps a central register of the data that it processes. This enables the HC to respond to any specific requests you may have about the processing of your personal data.

4. Processing register

Each faculty or service unit must keep a register of all instances when personal data are processed. For each processing activity, this register briefly describes which types of data are processed, why the data are collected, what will be done with the data, and who is responsible for the processing. This will enable you to check whether we are using your data in accordance with the stipulations of the GDPR. <u>Processing register HC</u>.

5. Purpose of processing personal data

The HC processes personal data in the context of: teaching activities, academic research, the business operations of the organization, and to support teaching and research. Our <u>processing register</u> describes which personal data are collected and used for these purposes. The purposes set by the University of Groningen are shown in the <u>General privacy statement</u>.

6. Legal bases underlying the processing of data

The legal bases underlying the processing of data of the HC are diverse. Primarily, the processing of data supports the HC in the performance of its public duties, i.e. providing academic teaching and research. Processing of data may also take place on the basis or for the purpose of:

- executing an agreement made with you
- protecting your or other people's vital health interests
- compliance with a legal obligation
- a legitimate interest to process the data (only insofar as the processing does not take place as part of the exercise of a public duty)
- the permission to process data granted by you

If you have given permission to process your personal data, you have the option to withdraw your permission. The <u>processing register</u> describes the legal basis that applies to each specific processing.

7. Further processing, reuse for academic research

Personal data may be processed for purposes other than those for which they were collected. In such a case, the impact this processing may have on you as a data subject is weighed against the purpose for which the data are processed. The question of whether you can reasonably expect, at the time and within the framework of the data collection, that your data may be processed for this purpose will also be taken into account. We will always observe the statutory regulations in this respect.

Personal data will only be further processed in a way that is compatible with the purposes for which they were obtained. We will carefully assess whether there is compatibility.

Personal data that have been collected for another purpose may be reused for academic research. Further processing of personal data for historical, statistical, and academic purposes will generally be considered compatible with the original purposes of processing. You will be specifically informed of this, except in exceptional cases.

8. Categories of personal data

Personal data are all data by which you can be identified (directly or indirectly). Our <u>processing register</u> describes in more detail which personal data are collected and used for these purposes: link to service unit or faculty. The HC is committed to providing an overview that is as complete as possible.

9. People handling your personal data

Within the HC organization, your personal data will only be processed by individuals who need access to your data in the context of fulfilling their professional duties.

For the implementation of its processes, the HC uses various parties that process personal data for the HC (e.g. IT suppliers or research agencies). Written agreements are always made with these 'processors', ensuring that your personal data are treated carefully and securely.

The HC also exchanges personal data with government agencies, universities (national and international), and other third parties. The HC may be jointly responsible, together with another party, for the processing of your personal data. If your personal data are made available to a third party by the HC, it is possible that this party will pass on the data to another party. When, in the eyes of the law, the HC is responsible for passing on the data to a third party, measures will be taken to ensure the careful and safe handling of your personal data.

The HC is allowed to pass on personal data that it possesses to a third party for the purpose of academic research. The conditions for reuse of personal data for academic research will apply accordingly in this context.

Our <u>processing register</u> describes which organizations will receive your personal data: link to service unit or faculty.

10. External sources of data

In most cases, the HC obtains the personal data it processes from you. In some cases, the data may be obtained from an external source. Where possible, you will be specifically informed about this in advance.

Our processing register describes from whom we have received your personal data: link to service unit or faculty.

11. International processing

Your personal data may be processed outside the European Economic Area – where European privacy legislation does not apply – for a certain purpose under the responsibility of the HC. In such cases, the HC will see to it that measures are taken to ensure the careful and safe handling of your personal data.

Our <u>processing register</u> describes which international processing activities of your personal data have taken place and which measures have been taken.

12. Retention periods

The HC will not retain your personal data any longer than is necessary for achieving the processing objectives. The relevant retention periods are set out in the *Basisselectiedocument Selectielijst Universiteiten en Universitair Medische Centra 2020, Staatscourant NA/2020/18001001 2020, 5156.* Personal data may be kept longer if required, for example, for historical, statistical, or academic purposes.

In some cases, the retention period is not stated in the Basic Selection Document, a specific retention period is described in our <u>processing register</u>.

13. Automated decision-making

The HC may make use of profiling in the context of providing suitable education or in the context of research. If the HC decides to use automated decision-making on the basis of personal data, it will inform the relevant data subject about this and observe the applicable statutory regulations. Information will be provided about the logic behind the decision-making if this is also automated.

Our <u>processing register</u> describes which processing activities involve automated decision-making.

14. Your rights

You have various rights under privacy legislation. If you want to exercise your rights, please contact the UG at privacy@rug.nl. Your request will be assessed and processed within one month of receipt. If your request deals with a complicated issue or if you submit many requests, this period may be extended to a maximum of three months.

In order to be taken into consideration, it must first be established whether the request has been submitted by an authorized person and whether or not the request is legitimate. This is why you may be asked for your ID before the request is taken into consideration.

You have the right to ask the HC for an overview of all of your personal data that have been collected, how they have been processed, and how long they will be stored for. If you feel that your personal data are incorrect or if you no longer want your data to be processed, you can submit a request to change these data or to stop processing your personal data and to delete them.

You have the right to request a copy of your personal data in a usable format if the data are processed on the basis of an agreement with you or on the basis of your permission. This right only applies to personal data that are processed automatically.

If you have given permission for the processing of your data, you also have the right to revoke this permission. In order to assess and process your request, your personal data will naturally be processed.

15. Complaints

If you are of the opinion that the provisions of this Privacy Statement are not being complied with or if you have another reason to complain about the handling of your personal data, please file a complaint with the Central Reporting Office for Privacy Matters (*Centraal meldpunt privacy*) of the UG by email: privacy@rug.nl.

The provisions of the Central Portal for the Legal Protection of Student Rights, the University of Groningen General Complaints Procedure, and the General Administrative Law Act may apply to the handling of your complaint. You will be informed of this when your complaint is handled.

In addition to the right to address questions, requests, and complaints to the UG, you have the right to file a complaint with the supervisory authority. For the Netherlands, this is the *Autoriteit Persoonsgegevens* (Dutch Data Protection Authority).

16. Amendments to this Privacy Statement

The HC is authorized to change this Privacy Statement. Possible reasons for changing the statement may include amendment(s) to laws and regulations or new laws and regulations, changes to the General Privacy Policy of the UG, and advances in technology. Naturally, you will be informed of this.

This statement from Honours College was published on 15 June 2022 and most recently updated on 1 Juni 2022.