

# General Privacy Statement of the University of Groningen

## 1. Introduction

The University of Groningen (UG) wants to handle your personal data with the utmost care at all times. The UG is legally responsible in this respect, and the UG takes this responsibility seriously.

All students, staff members, research subjects and other individuals associated with the UG must be able to trust that their personal data will be lawfully processed and adequately protected by the UG. The UG 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 UG processes information about you and about your rights. This privacy statement has been drawn up in conjunction with the [UG's privacy policy](#).

## 2. Contact details of the party responsible

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

Attn. Central Privacy Desk

E-mail: [privacy@rug.nl](mailto:privacy@rug.nl)

Your message will always be shared with the Data Protection Officer of the UG.

## 3. Status of this Privacy Statement

This document elaborates on the General Privacy Statement of the UG. This Privacy Statement outlines what kind of personal data the UG processes and for what purposes. The UG will keep a central register of the data that have been processed. This enables the UG to respond to any specific requests you may have about the processing of your personal data.

In some cases, you must be specifically informed in advance about the processing of your personal data. In such cases, a specific privacy statement will be submitted with reference to this General Privacy Statement.

## 4. Purpose of processing personal data

This General Privacy Statement outlines the purposes for which your data will be processed. The UG is committed to providing an overview that is as complete as possible.

The UG processes personal data in the context of:

- Educational activities
- Scientific research
- Operational management

#### **a. Education**

In the context of its teaching activities, the UG processes the personal data of students and prospective students and alumni for the following purposes:

1. Determining the identity of students and prospective students;
2. Informing prospective students about degree programmes at the UG
3. Recruiting new students and promoting the University
4. Carrying out administrative activities relating to registration and to the calculation, recording and collection of tuition and examination fees
5. Assessing prior qualifications and operating a ballot system, matching and selection
6. Enrolling students for course units and registering attendance
7. Providing and delivering educational resources, IT facilities and catering facilities
8. Supporting students with a physical or intellectual disability
9. Measuring and improving the quality of teaching and teaching facilities
10. Preparing policy decisions in the field of teaching and creating management information for the governing bodies within the University
11. Offering supplementary teaching, placements, career preparation and other extracurricular activities
12. Organizing and conducting University elections
13. Recording study results and examination results, and preparing degree certificates
14. Advising and supporting students and assessing special circumstances related to a binding (negative) study advice
15. Dealing with complaints, objections and appeals
16. Registering students for alumni associations
17. Raising funds among alumni
18. Securing the University buildings
19. Securing information and the proper functioning of IT facilities.

#### **b. Research**

The UG may process your personal data for all kinds of academic research. The UG does this for the benefit of the public good, the interests of the UG's relations and/or the legitimate interests of the university itself. You will always be specifically informed about this if required by law.

#### **c. Operational management**

In the context of its operational management, the UG processes the personal data of staff members, consumers and contact persons for the following purposes:

1. Determining the identity of current and prospective staff members
2. Recruiting and selecting new staff members
3. Providing development opportunities for staff members and assessing staff members
4. Providing and delivering a work station, equipment and catering facilities
5. Implementing agreed terms of employment, complying with obligations under labour and tax legislation and paying wages and allowances for expenses

version 1.0 23 April 2018

6. Registering working hours, absenteeism and leave
7. Providing occupational health care, assessing incapacity for work and implementing reintegration programmes
8. Providing information that is relevant to staff members
9. Measuring staff satisfaction and the quality of staff facilities
10. Preparing policy decisions in the field of operational management and creating management information for the governing bodies within the University
11. Organizing and conducting University elections
12. Handling complaints, objections and appeals and dealing with other legal matters
13. Keeping financial records, and preparing annual accounts and budgets and having them approved
14. Accreditation and certification procedures
15. Offering and delivering products and services to consumers
16. Purchasing products and services and managing contracts
17. Securing, maintaining and operating the University buildings
18. Securing information and the proper functioning of IT facilities;
19. Informing contact persons of students and staff in case of an emergency;
20. Compiling user statistics regarding facilities of the UG.

## **5. Principles underlying the processing of data**

The principles underlying the processing of data for the purposes described above are diverse. Primarily, the processing of data supports the UG 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
- Complying with a legal obligation to which the UG is subject
- A legitimate interest of the UG to process the data (only insofar as the processing does not take place as part of the exercise of the UG's public duty)
- The permission to process data granted by you.

If you have given the UG permission to process your personal data, you have the option to withdraw your permission.

## **6. Further processing, reuse for academic research**

It may happen that the UG processes personal data 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 UG processes the data. The UG 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. The UG will carefully assess whether there is compatibility. Further processing of personal data for historical, statistical and scientific purposes will be considered compatible with the original purposes of processing.

Personal data that the UG has collected for another purpose may be reused by it for academic research. This does not require the permission of the person concerned if the following conditions are met:

version 1.0 23 April 2018

1. Requesting permission is not required by law
2. The research serves a public interest or a legitimate interest of the University
3. The research cannot be conducted without the relevant data;
  
4. The privacy of the data subject will not be disproportionately infringed by the processing of the data and it is established that no personal data from research subjects will be included in publications about the research
  
5. The research is conducted in accordance with a code of conduct pertaining to the researcher.

## **7. Categories of personal data**

Personal data are all data by which you can be identified (directly or indirectly). This General Privacy Statement outlines which categories of personal data are processed by the UG. The UG is committed to providing an overview that is as complete as possible. The UG processes the following categories of personal data:

1. Name and address data: name, address, postal code, place of residence and place of birth
2. Data relating to age: ages and birth dates
3. Contact details: email address and telephone number (business and private)
4. Data about your gender
5. Data about your nationality
6. Data about your educational background and work experience: CV, certificates, diplomas, employment history, etc.
7. Data on performance as a staff member, data on hours worked and data on travel and other expense claims;
8. Financial data: bank account number, credit card information, income data, claim data
9. Identification data: Social security number (BSN), identity card number, passport photos
10. Account information: student or staff number, password, electronic signature, social media accounts
11. Location data: logging data, IP numbers, data on access to buildings
12. Usage data: logging data
13. Photos and video images: promotional material, camera images
14. Health data: data on absenteeism and leave, data on incapacity for work, special circumstances concerning study delay, data on physical or intellectual disabilities
15. Data which are processed or created in the context of academic research.

This may involve personal data that the UG has obtained from you or a third party, or data that the UG has collected itself.

## **8. Recipients of your personal data**

Within the UG organization, your personal data will only be processed by individuals who need access to your data.

version 1.0 23 April 2018

For the implementation of its processes, the UG uses various parties that process personal data for the UG (e.g. IT suppliers or research agencies). These 'processors' are always subject to written agreements, ensuring that your personal data are treated carefully and securely.

The UG also exchanges personal data with government agencies, universities (national and international) and other third parties. It may also happen that the UG and another party are jointly responsible for the processing of your personal data. If your personal data are made available to a third party by the UG, it is possible that this party will pass on the data to another party. When in the eyes of the law, the UG 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 UG 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.

### **9. External sources of data**

In most cases, the UG obtains the personal data it processes from you. In some cases, the data is obtained from an external source. Where possible, you will be specifically informed about this in advance. You may request further information from the UG at any time.

### **10. International processing**

It is possible that your personal data will be processed outside the European Economic Area - where European privacy legislation does not apply - for a certain purpose under the responsibility of the UG. In that case, the UG will see to it that measures are taken to ensure the careful and safe handling of your personal data.

### **11. Storage periods**

The UG will not retain your personal data longer than is necessary for achieving the processing objectives. The exact storage periods and the conditions for extending them will be determined by the UG for each processing activity. Upon request, the UG will inform you how long your personal data will be stored. Personal data may be kept longer if required for historical, statistical or academic purposes.

### **12. Automated decision-making**

The UG may make use of profiling in the context of providing suitable education or in the context of research. If the UG decides to use automated processing of personal data, it will inform the data subject about this and provide insight into the logic behind this decision. The UG does not make decisions based on purely automated processing of personal data.

### **13. Your rights**

You have various rights under privacy legislation. If you want to exercise your rights, please contact the UG at [privacy@rug.nl](mailto: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.

version 1.0 23 April 2018

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 UG for an overview of the personal data collected on you, the processing thereof and the applicable storage periods. 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. In certain cases, you are also entitled to a copy of your personal data in a usable format. 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.

#### **14. Complaints**

If you are of the opinion that the provisions of this Privacy Statement are not being complied with or 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](mailto:privacy@rug.nl).

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

In addition to addressing questions, requests and complaints to the UG, you have the right to file a complaint with the supervisory authority. In the Netherlands, this is the Data Protection Authority (DPA).

#### **15. Amendments to this Privacy Statement**

This Privacy Statement was adopted by the Board of the University on 23 April 2018 and was subsequently published on the UG's public website, taking effect as of that date. The UG is authorized to change this privacy statement. A possible reason for changing the statement could be: 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.