

General Privacy Statement of the University of Groningen

1. Introduction

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

All students, staff members, research participants, 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. Personal data that are processed within the UG will be handled carefully and properly at all times. Compliance with the applicable privacy laws and regulations enables the UG to provide a consistent, high level of protection of the rights and freedoms of individuals.

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 questions and possible complaints will be taken seriously and will be properly dealt with.

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 privacy policy of the UG.

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

for the attention of the Central Privacy Desk

E-mail: privacy@rug.nl

Your message will always be shared with the Data Protection Officer (DPO) of the UG. The DPO can also be contacted directly via fg@rug.nl.

3. Status of this Privacy Statement

This document relates to 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 provide you with more specific information about the processing of your personal data. The register can be consulted via www.rug.nl/privacy.

In some cases, you must be informed in advance about the processing of your personal data. In such cases, a separate 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 teaching activities, academic research, the business operations of the organization, and to support teaching and research. More specifically, the UG processes personal data for the following purposes:

- 1. Determining the identity of prospective and registered students
- 2. Informing prospective and registered 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. Recording and presenting lectures
- 8. Receiving and assessing student assignments
- 9. Assessing study performance and awarding ECTS credit points
- 10. Providing and delivering teaching resources, IT facilities and catering facilities, and facilitating remote collaboration
- 11. Supporting students with functional impairments or students in extraordinary circumstances, and taking measures in response to cheating during examinations
- 12. Appointing study advisors and/or psychologist to provide support and guidance to students
- 13. Measuring and improving the quality of teaching and teaching facilities
- 14. Preparing policy decisions in the fields of teaching, research, and business operations, and creating management information for the governing bodies within the University
- 15. Conducting quality assessments in preparation for policy decisions
- 16. Organizing and providing information about supplementary teaching, placements/internships and host organizations, career preparation, and other extracurricular activities
- 17. Implementing exchange programmes
- 18. Organizing and conducting elections for consultative participation bodies and facilitating consultative participation
- 19. Recording study results, examination results, and final assessment results, and arranging lists of marks, approval of course units, statements, and degree certificates
- 20. Advising and supporting students and assessing special circumstances related to binding (negative) study advice
- 21. Dealing with requests, complaints, objections, and appeals, as well as reports of unacceptable behaviour, personnel problems, and malpractices
- 22. Registering graduates for alumni associations
- 23. Raising funds among alumni and maintaining relationships with alumni
- 24. Securing, maintaining, and operating the University buildings
- 25. Securing information and ensuring the proper functioning of IT facilities
- 26. Applying for, registering, and paying out student grants and research grants
- 27. Organizing and registering visa and residence permits for students, students, staff members and/or customers
- 28. Archiving documents and information
- 29. Organizing teaching and examinations

- 30. Promoting student accommodation and students' social life
- 31. Determining the identity of current and prospective staff members
- 32. Recruiting, selecting, and appointing new staff, external staff, and PhD students
- 33. Providing development opportunities and assessing staff members
- 34. Providing and delivering facilities such as a work station, equipment, software, professional and other literature, and catering facilities
- 35. Implementing agreed terms of employment, complying with obligations under labour and tax legislation, and paying wages and expense allowances
- 36. Registering working hours, absenteeism and leave, and implementing the relevant regulations
- 37. Providing occupational health care, assessing incapacity for work, and implementing reintegration programmes
- 38. Providing information that is relevant to the work or study situation of staff members and students
- 39. Measuring staff and student satisfaction and the quality of staff and teaching facilities
- 40. Keeping financial records, managing finances, drawing up prognoses, budgets, and annual reports and having them approved, and preventing financial fraud (including financial integrity fraud)
- 41. Implementing project administration and assessing grant spending
- 42. Completing University accreditation and certification procedures
- 43. Complying with obligations arising from pension schemes and other collective labour agreements
- 44. Offering and delivering products and services to consumers
- 45. Purchasing products and services and managing contracts
- 46. Informing contact persons of students and staff in case of emergency
- 47. Compiling user statistics regarding facilities of the UG
- 48. Purchasing and organizing facility products and services
- 49. Calculating and distributing teaching duties of lecturers
- 50. Organizing internal and external consultation and collaboration
- 51. Recruiting and selecting members for committees within faculties or service units, and paying out their expense claims
- 52. Organizing, administering, and communicating about conferences and events
- 53. Organizing internal and external secondment of staff members
- 54. Conducting academic research
- 55. Supervising, supporting, and managing PhD students
- 56. Arranging gifts for special occasions (illness, anniversary, birthday, etc.)
- 57. Processing and sending mail items
- 58. Organizing travel and accommodation
- 59. Maintaining relationships
- 60. Organizing research-related business operations, including registration of research output and monitoring academic integrity
- 61. Dealing with legal issues, achieving compliance, and protecting the legal position of the University.

5. Principles underlying the processing of data

The legal bases 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 tasks of public interests, i.e. providing academic teaching and research. These duties are stipulated in the

Higher Education and Research Act. 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 or another party to process the data (only insofar as the processing does not take place as part of the exercise of the UG's public task)
- The consent to process data given by you.

If you have given the UG consent to processes your personal data, you have the option to withdraw your consent.

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 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. 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.

The UG may decide to reuse personal data for academic after it has been collected for another purpose. 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 if necessary.

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 data, such as surname and initials
- 2. Contact information, such as address or e-mail address
- 3. Information regarding relationship, such as civil status
- 4. Information on gender
- 5. Data relating to birth and death
- 6. Residence and visa information
- 7. Financial data
- 8. Account details, metadata and location data
- 9. Personal identification numbers
- 10. Information about application, registration, or deregistration
- 11. Information about study progress, monitoring and graduation
- 12. Employment details
- 13. Research data
- 14. Biometric data

- 15. Health data
- 16. Information relating to religion or ideology
- 17. Data that reveal membership of a trade union or professional association
- 18. Information about an individual's sex life
- 19. Information about an individual's political persuasion
- 20. Data on racial or ethnic origins.

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. People handling your personal data

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

11. Retention periods

The UG will not retain your personal data any longer than is necessary for achieving the processing objectives. The <u>Selectielijst Universiteiten en Universitair Medische Centra 2020</u> (in Dutch) serves as a guiding principle for this purpose. 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 decision-making on the basis of personal data, it will inform the relevant data subject about this and observe the applicable statutory regulations. Access will be provided to the logic behind the decision-making if this is also automated.

13. Your rights

You have various rights under privacy legislation. Please contact the UG at privacy@rug.nl if you want to exercise your rights. 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 UG for an overview of all of the personal data that has been collected concerning you, how it has been processed and how long it 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.

14. 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 Privacy Desk of the UG by email: 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 Dutch 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).



15. Amendments to this Privacy Statement

The first version of 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 amend this Privacy Statement. Possible reasons for amending 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.

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