

STUDENT PERSONAL DATA PROCESSING REGULATIONS VRIJE UNIVERSITEIT AMSTERDAM

Student Personal Data Processing Regulation Vrije Universiteit Amsterdam

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Introduction

The VU Foundation (hereinafter: **VU**) collects and processes a wide range of personal data of students in its capacity as an educational institution. To register with the VU, students provide various personal data such as their name, address, date of birth and educational background. During their study, the VU also collects and processes personal data of students, such as exam results, information on academic progress and attendance/absenteeism records. These personal data are viewed and processed by authorized employees of the VU, such as lecturers and student administration staff.

The VU is committed to ensuring the integrity and confidentiality of the personal data of its students. Compliance with laws and regulations on the protection of personal data and privacy is of great importance to the VU.

These regulations (hereinafter: **Regulations**) outline the duties, responsibilities and procedures and describe how data subjects can exercise their rights when their personal data are processed by the VU.

The purpose of these Regulations is to promote and ensure that:

- the VU complies with the applicable laws and regulations on the protection of personal data;
- employees of the VU have a framework of standards for dealing with personal data of students in the performance of their duties;
- students receive sufficient information about the manner in which the VU processes their personal data.

These Regulations outline student data processing. On VU.nl you can find more detailed information about the various specific data processing operations. Here you can also find more information on the rules and guidelines that apply to students, such as the Regulations on ICT Facilities for Students and the Student Charter.

Article 1. Definitions

The terms used in these Regulations have the meaning as defined in the General Data Protection Regulation (hereinafter: the **Law**) and related laws and regulations, unless explicitly stated otherwise.

- a. **Filing System:** every structured set of Personal Data which can be accessed according to certain criteria, irrespective of whether this is entirely centralized or decentralized or disseminated on functional or geographical grounds.
- b. **Data Subject:** the person to whom the Personal Data relate. In the context of these Regulations, this at least concerns the Student.
- c. **Authorized Officer:** the person whom the VU has authorized to access certain Personal Data for the performance of his professional duties. In addition to Employees, this may also include people working at the VU without a permanent contract of employment with the VU, such as temporary employees, seconded employees, self-employed persons, trainees or visiting lecturers.
- d. **Special Personal Data:** Personal Data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health and data concerning a natural person's sex life or sexual orientation.

- e. **Executive Board:** the board of the VU.
- f. **Third Party:** a natural or legal person, public authority, agency or other body, not being the Data Subject, the VU, a Processor or the persons directly authorised by the VU or a Processor to process the Personal Data.
- g. **Third Country:** all countries outside the European Economic Area (= all countries in the European Union, Liechtenstein, Norway and Iceland).
- h. **Data Protection Officer (DPO)** of the VU: an internal officer within the meaning of Article 37 ff. of the General Data Protection Regulation (AVG). The DPO independently supervises the compliance with data protection laws and regulations and the policies of the VU regarding the protection of personal data.
- i. **Employee:** a person who has a contract of employment with the VU Foundation.
- j. **Personal Data:** all information about an identified or identifiable natural, living person (the Data Subject). Personal Data is a broad term comprising virtually all data relating to a natural person. This includes both objective and subjective data, irrespective of whether the information is correct. It thus comprises information about a person (such as his name, date of birth and gender) as well as value judgements and impressions (such as a student's performance appraisal). Only in exceptional cases does information concerning a natural person not qualify as Personal Data.
- k. **Student:** a person who is registered with the VU as a student or external student within the meaning of the Higher Education and Research Act, a course participant, a contract student, an interested party who has requested the VU for information, an applicant who has submitted a registration request to the VU and an alumnus.
- l. **Processor:** a natural or legal person, a public authority, an agency or other body that processes Personal Data on behalf of and under the responsibility of the VU. The VU gives the Processor instructions and determines the purposes and means of the processing of the Personal Data. The Processor may only process the Personal Data on the instructions of the VU. If the VU outsources a Processing operation to a Processor, additional statutory rules apply, such as the obligation to draw up a Data Processing Agreement. An Employee of the VU falls within the hierarchy of the VU (internal management) and is not regarded as a Processor for the VU.
- m. **Data Processing Agreement:** the Controller and Processor are legally obliged to provide for envisaged Processing operations in an agreement or other legal act. A Data Processing Agreement is the most commonly used instrument for this purpose. A Data Processing Agreement shall at least stipulate that: the Processor provides sufficient guarantees relating to the implementation of appropriate technical and organizational security measures, the Processor shall exclusively process the Personal Data on the basis of written instructions from the VU and the Processor assures that the persons authorized to process the personal data are subject to a confidentiality obligation. Furthermore, arrangements are made regarding, inter alia: the subject matter and duration of the Processing, the nature and purposes of the Processing, the type of Personal Data and the categories of data subjects and the rights and obligations of the Controller and Processor.
- n. **Controller:** a natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the Processing of Personal Data. In the context of these Regulations, this is the VU. The VU has the formal legal authority to determine the purposes and means of the processing operations. The various faculties and departments are responsible for ensuring that their processes remain within the limits of the framework of standards of these Regulations.
- o. **Processing:** any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether or not by automated means, such as the collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction of data.

Article 2. Scope

- 2.1 These Regulations apply to the Processing of Personal Data of VU Students.
- 2.2 These Regulations are, insofar as relevant, also applicable to the Processing of Personal Data of other Data Subjects, such as family members of the Students.
- 2.3 These Regulations are not applicable to the processing of information about deceased persons. The VU processes these data with all due care and in compliance with applicable laws and regulations.
- 2.4 These Regulations apply to the Processing of Personal Data wholly or partly by automated means (via a computer or electronic system such as the Digital Student File) and to the Processing of Personal Data (by manual means) which form part of a Filing System or are intended to form part of a Filing System.
- 2.5 These Regulations apply to the Processing of Personal Data by all organizational units of the VU.

Article 3. Purposes of the Processing

- 3.1 The VU only collects Personal Data for specified, explicit and legitimate purposes ('purpose limitation') and exclusively processes Personal Data for these purposes and other compatible purposes. The purposes for which the VU collects the Personal Data are determined before the Processing.
- 3.2 The VU collects and processes Personal Data for the following purposes:
 - a. administrative operations relating to student applications and registrations as well as the calculation, recording and collection of tuition and exam fees;
 - b. lottery and decentralized selection;
 - c. keeping records and grading of academic results and progress;
 - d. keeping records and grading of test and examination results;
 - e. fraud control and control time lapse in (online) examinations with (online) supervision of examinations and testing;
 - f. advising and supporting Students;
 - g. sending information about university and faculty activities;
 - h. internal provision of information;
 - i. policy-making;
 - j. suspensions, objections and appeals of Students;
 - k. student wellbeing services;
 - l. compilation of election rolls for the university and faculty Student Councils;
 - m. the implementation of statutory regulations;
 - n. maintaining, testing and securing of the IT-systems of the VU;
 - o. the protection of access to buildings, the electronic network or other VU facilities;
 - p. identification.
- 3.3 Where Personal Data are to be processed for a purpose other than that for which they were collected without the consent of the Data Subject, the VU shall decide whether further Processing is compatible with the purposes for which the Personal Data were collected, taking account of the following:
 - a. any link between the purposes for which the Personal Data were collected and the purposes of the intended further processing. The closer the link between the purposes, the more compatible the Processing is with the original purpose;
 - b. the context in which the Personal Data were collected. Compatible use is likelier if the Personal Data have been obtained from the Data Subject himself, rather than from a source other than the Data Subject;
 - c. the nature of the Personal Data, notably whether Special Personal Data are being processed. In general, compatible use is less likely if the Personal Data are of a more sensitive nature;

- d. the possible consequences of the intended Processing for the Data Subject. If further Processing leads to a certain decision being taken about the Data Subject, compatibility is less likely than if the Personal Data are used for research;
 - e. The extent to which appropriate safeguards have been established to protect the Data Subject, including encryption or pseudonymization. Which measures are appropriate is determined on a case-by-case basis.
- 3.4 Further processing of Personal Data for historical, statistical or scientific purposes is not deemed to be incompatible if the VU has made the necessary arrangements to ensure that further Processing exclusively takes place for these specific purposes. Personal Data are pseudonymized and encrypted wherever possible.

Article 4. Personal Data

- 4.1 The VU processes the following Personal Data or categories of Personal Data for the aforementioned purposes and exclusively insofar necessary:
- a. name, address, place of residence, telephone number and email address of the Data Subject;
 - b. gender, date of birth, nationality, citizen service number (BSN), student number, account number of the Data Subject;
 - c. information about the previous education of the Data Subject, including courses and grades;
 - d. information about the degree programme, registration and funding of the Data Subject;
 - e. financial data of the Data Subject, such as data about invoicing and payment of tuition fees and/or other costs and the award of certain funds to the Data Subject;
 - f. information about the academic performance and progress of the Data Subject, such as grades, papers, credits, exam results, date of first-year diploma, date of degree certificate;
 - g. information about skills, areas of expertise, preferences and interests of the Data Subject;
 - h. information about the attendance/absence of the Data Subject at the VU;
 - i. information about suspensions, objections and appeals of the Data Subject;
 - j. information about the career and career progress of the Data Subject;
 - k. data associated with or resulting from the use of ICT facilities, such as usernames, IP addresses, video and audio recordings and, login attempts;
 - l. other information about the Data Subject that are necessary for the implementation of statutory requirements.

Article 5. Special Personal Data

- 5.1 Special Personal Data provide sensitive information about a person. The processing of Special Personal Data can lead to a serious breach of the privacy of the Data Subject. The processing of Special Personal Data is therefore subject to stricter rules.
- 5.2 The processing of Special Personal Data within the VU is prohibited unless the Data Subject gives his explicit, informed and specific prior consent for the Processing or when the Law provides for an exemption for this Processing.
- 5.3 The VU processes, insofar as necessary, the following Special Personal Data:
- a. Personal data about health. For instance, the VU processes:
 - data about a physical handicap or chronic or other illness of the Student with a view to providing special support and/or counselling or taking other special measures;
 - b. Personal data about racial or ethnic origin. For instance, the VU processes:
 - data about the nationality of a Student because this is required by law.
 - c. Biometric data for the purpose of uniquely identifying a natural person. For instance, the VU processes:

- photos of Students for security passes to access buildings, spaces and facilities of the VU. Biometric data are derived from a specific processing of physical, physiological or behavioural characteristics that permit unique identification, such as a photo of a Student.
- d. Personal data about religious or philosophical beliefs. For instance, the VU processes such personal data:
 - due to the fact that a Student's religion or beliefs can be derived from a photo for a security pass.
- 5.4 The Processing of the citizen service number (BSN) by the VU is only permitted insofar as required by law. The VU is, for instance, legally obliged to request the BSN of a Student during the registration and to keep a record of this BSN. The VU may not use the BSN if this is not required by law. Not even if the Data Subject were to consent to such use.
- 5.5 Personal Data concerning criminal convictions and offences or related security measures are only processed insofar as specifically required by the Law.

Article 6. Legal Basis for Processing

- 6.1 A Processing operation must always have a legal basis. Processing without a legal basis is not permitted. The VU derives the legal basis for personal data processing from the following:
 - a. the Processing is necessary to pursue the legitimate interests of the VU or a Third Party to which the Personal Data are disclosed, except where such interests are overridden by the interests or fundamental rights and freedoms of the Data Subject, particularly the right to the protection of private life. The VU must always consider whether it or the Third Party to whom the Personal Data are disclosed genuinely has a legitimate interest. The Processing must be necessary to achieve this interest. In addition, the VU must consider whether it should refrain from processing the Personal Data because the Data Subject's interests and/or right to protection of private life override the interests of the VU. In this connection, the VU must in all events take account of the sensitivity of the Personal Data and, insofar as the Processing takes place, establish safeguards to ensure the careful use of the Personal Data;
 - b. the Processing is necessary to enable the VU to comply with its legal obligations;
 - c. the Processing is necessary for the prevention or control of a serious threat to the health of the Data Subject;
 - d. the Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the VU; or
 - e. the Data Subject has already given his specific, unambiguous and informed consent for the Processing. It is essential that the Data Subject expressed his will in full freedom. This means that the Data Subject must not have consented under pressure of circumstances. The Data Subject must not suffer any negative consequences as a result of refusing to consent to the Processing. In addition, consent must always relate to one or more specific Processing operations. The Data Subject must receive sufficient information to understand what he is consenting to before the Processing takes place.
- 6.2 The Data Subject can withdraw his consent, as referred to in Article 6.1 (e), at all times without stating reasons. This withdrawal has no consequences for the data processing that took place before the withdrawal of the consent. If consent is the legal basis for the Processing and the Data Subject withdraws his consent, the Processing must be discontinued.

Article 7. Transparent information and communication

- 7.1 The VU takes appropriate measures to provide transparent, easily accessible and readily understandable information and communication regarding the Processing of Personal Data. Data Subjects must be able to easily ascertain that their Personal Data are processed and why, for instance by means of privacy statements and FAQs.
- 7.2 The information is provided in writing or by other means, such as electronic means. If the Data Subject so requests, the VU can also provide information orally, provided that the identity of the Data Subject has been proven.

Article 8. Obligation to provide information

- 8.1 If the VU collects Personal Data from the Data Subject, it shall provide the following information to ensure fair and transparent Processing:
- its contact details and, where applicable, those of a contact person;
 - the contact details of the Data Protection Officer;
 - the purposes of the processing of the Personal Data and the legal basis for the Processing;
 - the legitimate interests of the VU or of a third party, if this is the legal basis for the Processing;
 - where appropriate, the recipients or categories of recipients of the Personal Data;
 - where appropriate, the fact that the VU intends to transfer the Personal Data to a Third Country or an international organization and the appropriate or suitable safeguards that have been established (in the absence of an adequacy decision by the European Commission), the means by which a copy of the data can be obtained or where they have been made available;
 - the period for which the Personal Data will be stored or, if that is not possible, the criteria to determine that period;
 - the fact that the Data Subject has the right to request the VU for access to and rectification or erasure of the Personal Data or restriction of the processing of his Personal Data, as well as the right to object to the Processing and the right to data portability, as referred to in Article 18 of these Regulations;
 - the fact that the Data Subject has the right to withdraw his consent at all times if this is the legal basis for the Processing;
 - the Data Subject has the right to submit a complaint to the Dutch Data Protection Authority (AP), as referred to in Article 19.2 of these Regulations;
 - whether the provision of Personal Data is a statutory or contractual requirement or a requirement that must be met to enter into a contract as well as whether the Data Subject is obliged to provide these Personal Data and the possible consequences of failing to do so;
 - the existence of automated decision-making and, insofar as relevant, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such Processing for the Data Subject.
- 8.2 In cases where the VU does not obtain the Personal Data from the Data Subject, the VU shall, in addition to the information mentioned in Article 8.1 of these Regulations, provide the following information:
- the categories of Personal Data concerned;
 - the source from which the personal data originate, and if applicable, whether they came from publicly accessible sources.
- 8.3 Where the VU intends to further process the Personal Data for a purpose other than that for which the Personal Data were collected, the VU shall provide the Data Subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in Article 8.1. and insofar as relevant Article 8.2.

- 8.4 The obligation to provide information as referred to in Article 8.1 is not applicable if the Data Subject already has the information.
- 8.5 The obligation to provide information as referred to in Article 8.2 is not applicable if:
- a. the Data Subject already has the information;
 - b. the provision of such information proves impossible or would involve a disproportionate effort, in particular for Processing for archiving purposes in the public interest, or for scientific, historical research or statistical purposes;
 - c. obtaining or disclosure of the Personal Data is expressly laid down by Union or National Law to which the VU is subject and which provides appropriate measures to protect the Data Subject's legitimate interests;
 - d. the Personal Data must remain confidential subject to a professional secrecy obligation.

Article 9. Access to Personal Data

- 9.1 The Personal Data that are processed by the VU are accessible on a 'need to know basis' for:
- a. Authorized Officers who require access to Personal Data for the performance of their specific duties; and
 - b. the Processors engaged by the VU.
- 9.2 Every Student has access to his digital student file.
- 9.3 A Data Processing Agreement containing adequate safeguards to guarantee the security and confidentiality of the Processing and to ensure that all other requirements laid down by the Law are met is concluded with all Processors who process Personal Data on the instructions and under the responsibility of the VU.

Article 10. Disclosure of Personal Data to Third Parties

- 10.1 The VU exclusively discloses Personal Data to Third Parties if this is compatible with the purposes as mentioned in Article 3 and the Law provides a legal basis for this. The VU can, for instance, disclose Personal Data to the Education Executive Agency (DUO), the Ministry of Education, Culture and Science (OCW) and Statistics Netherlands (CBS).

Article 11. Quality of Personal Data

- 11.1 The VU shall always make every reasonable effort to ensure that the processed Personal Data are correct and accurate. In addition, the VU shall always keep its Personal Data Processing to a minimum. This means that the Processing must in all events be discontinued or modified if the purpose of the Processing can also be achieved with no or less Personal Data.
- 11.2 Personal Data of Students are processed in a digital student file. The VU shall make every reasonable effort to keep these files complete and up to date. Students are personally responsible for making changes in their file as promptly as possible or for communicating such changes to the relevant department within the VU. The digital student file prevails over other information sources. No shadow files are maintained.

Article 12. Retention Periods and Erasure of Personal Data

- 12.1 Personal Data of Data Subjects may not be retained for longer than necessary for the purposes for which they were collected and processed.
- 12.2 The VU adheres to the statutory retention period for Processed Data. The VU has set retention periods in cases where no statutory retention period is specified.
- 12.3 The VU has set up an archive management function for Personal Data that are intended for archiving.

Article 13. Confidentiality

- 13.1 All Authorized Officers are obliged to maintain confidentiality with regard to the Personal Data. They are only permitted to share, publish or otherwise process Personal Data insofar as necessary for the performance of their work for the VU or insofar as any legal requirement obliges them to do so.

Article 14. Security

- 14.1 The VU processes various types of Personal Data. Some of these processing operations, such as the Processing of Special Personal Data or the Processing of financial data, are highly sensitive.
- 14.2 The VU takes technical and organizational measures with regard to the security of the Personal Data in order to prevent accidental or unlawful destruction, loss, alteration, unauthorized access to or disclosure of personal data transmitted, stored or otherwise processed.
- 14.3 The VU determines the security measures, taking into account the state of the art, the costs of implementation, the nature, the size, the context, the processing purposes and the probability and severity of the risks. The VU shall ensure that the security is always adequate.
- 14.4 Any unauthorized Processing, loss of Personal Data or any other form of unlawful Processing, due to a security breach or any other reason, shall be acted on in accordance with the VU 'Duty to Report Data Breaches Protocol'.

Article 15. Privacy by Design and Privacy by Default

- 15.1 The VU shall ensure that the mechanisms used for Processing are designed as much as possible to protect the Personal Data of the Data Subjects as well as to achieve legal compliance ('Privacy by Design').
- 15.2 The VU shall ensure that the standard settings in a Processing operation are selected to assure maximum protection of the Personal Data of the Data Subjects ('Privacy by Default').

Article 16. Register of Processing operations

- 16.1 All Processing operations of the VU are recorded in the VU Register of Processing operations (hereinafter: **Register**). The Register is set up in conformity with Article 30 of the General Data Protection Regulation.

Article 17. International transfer

17.1 When processing Personal Data by the VU, Personal Data may be transferred to organisations in countries outside the European Economic Area (EEA) and international organisations. The EEA includes all EU countries plus Norway, Liechtenstein and Iceland.

17.2 Transfers to countries outside the EEA and international organisations only take place when an adequate level of protection is guaranteed and the requirements of the AVG, in particular Chapter 5, are met. These transfers will always be disclosed.

Article 18. Data Protection Officer (DPO) and internal Processing responsibility

- 17.1 The DPO of the VU is tasked with the supervision of compliance with these Regulations. The VU ensures that the DPO is able to perform his supervisory duties in an independent and effective manner. This means that he may not receive any instructions regarding the performance of his duties from the VU (or VU Executive Board) and shall not suffer any adverse consequences of his role as DPO. The DPO of the VU has an advisory role towards the Executive Board.
- 17.2 All Authorized Officers are obliged to comply with every reasonable request for cooperation that the DPO may make in the performance of his duties, unless a statutory confidentiality obligation prevents them from doing so.
- 17.3 The faculties and departments are responsible for ensuring compliance with these Regulations with regard to their internal Processing of Personal Data.

Article 19. Data Subject Rights

- 18.1 The Data Subject has the following rights:
 - a. Right to access and information. Data subjects have the right to access their Personal Data. Data Subjects can also enquire about the purposes of the processing, the categories of Personal Data, the recipients of the Personal Data and the envisaged period for which the Personal Data will be stored or, if that is not possible, the criteria used to determine that period. Where the Personal Data are not collected from the Data Subject, the Data Subject can also enquire about any available information as to their source. Where Personal Data are transferred to a Third Country, the Data Subject has the right to be informed of the appropriate safeguards relating to the transfer. Access can be refused if, for instance, this is necessary for the prevention, investigation, detection and prosecution of criminal offences or for the protection of the rights and freedoms of others.
 - b. Right to rectification. Data Subjects have the right to obtain from the VU without undue delay the rectification of inaccurate Personal Data relating to them. Taking into account the purposes of the Processing, the Data Subject also has the right to request the completion of incomplete personal data, including by means of providing a supplementary statement. Only objectively incorrect Personal Data are eligible for correction. In other words, the Personal Data must be clearly incorrect. For instance, a misspelled name. Data Subjects can request additions to their Personal Data if these are subjectively incorrect, i.e. if there is a difference of opinion as to whether the Personal Data are correct or incorrect. This could, for instance, concern an interview report or an appraisal.

- c. Right to erasure. Data Subjects have the right to have their Personal Data erased by the VU if:
 - the Personal Data are no longer necessary in relation to the purposes for which they were collected;
 - the Data Subject withdraws the consent on which the processing is based and there is no other legal ground for the processing;
 - the Data Subject objects in conformity with Article 18.1 (d) to the Processing of his Personal Data and this objection is upheld; or
 - the Personal Data have been unlawfully processed.
 - d. Right to object. Under certain circumstances, Data Subjects have the right to object to the Processing of their Personal Data by the VU. If this objection is justified, the Processing is immediately terminated.
 - e. Right to data portability. Data Subjects have the right to receive the Personal Data which they have provided to the VU and which are processed on the basis of consent. Students can access the data relating to their study via the digital student file.
- 18.2 The Data Subject can exercise the rights referred to under a. to e. of Article 18.1 as well as every other right that the Data Subject has pursuant to the Law by expressing this wish to the DPO. The DPO shall respond on the VU's behalf within 4 weeks. Data Subjects can always opt to discuss the matter first with their lecturer or other contact person.

Article 20. Complaints

- 19.1 The Data Subject can at all times submit a complaint about the Processing of Personal Data to the Executive Board, without prejudice to their rights as described in Article 18. The Executive Board will deal with complaints as promptly as possible and aims to give a considered response within 4 weeks.
- 19.2 The Data Subject can at all times submit a complaint about the Processing of Personal Data to the Dutch Data Protection Authority (AP).
- 19.3 The Data Subject can at all times turn to the competent court concerning the manner in which Personal Data are processed by the VU.

Article 21. Final Provisions

- 20.1 The Executive Board shall decide in cases not provided for in these Regulations.
- 20.2 These Regulations have been submitted to the University Student Council of the VU for approval.
- 20.3 These Regulations have been posted on the website of the VU.

These Regulations have been adopted by the Executive Board and take effect on the 1st of September 2022.
