

## Privacy statement of Inholland University of Applied Sciences

2020

Inholland University of Applied Sciences processes your personal data to meet statutory obligations and to ensure that its teaching tasks are carried out properly. We may need additional data from you for other reasons too, including work placements, additional supervision or guidance, study trips and other services. You are entitled to expect us to handle your personal data with all due care and confidentiality; this is provided for by law in the General Data Protection Regulation (GDPR).

Information about the partners we cooperate with digitally is also protected, in compliance with the GDPR, and cooperation is arranged via 'data processing agreements'.

We take the security of your data seriously, which is why we have taken appropriate measures to prevent the abuse, loss, unwanted publication and unauthorised modification of and unwanted access to your data.

### Why we process your data

We collect and register data through Studielink when you enrol as a student at Inholland University of Applied Sciences. This enables us to provide you with the supervision you need during the course of your studies, to monitor your study progress and, ultimately, to demonstrate that you have done everything necessary to be able to graduate. Inholland University of Applied Sciences also needs to process your personal data and study progress data to be in a position to account for its actions as part of an accreditation process and in respect of the results attained by students.

### Inholland University of Applied Sciences record of processing activities

We retain your data with all due care and only use them for the purposes determined by us in advance, as set out in the GDPR. These purposes and the data we use are described in the Inholland University of Applied Sciences record of processing activities, which can be accessed through Insite.

### How we obtain your data

We initially receive personal data from you when you enrol through Studielink. You also provide Inholland University of Applied Sciences with personal data when we need them for the degree programme you are studying and to supervise you as a student.

If we need data from you for services that do not fall under a statutory obligation or our teaching tasks, we ask for your consent to obtain and use the data in question. In situations like this, we explain why the data are required and state the party or parties with which we might share them. You will also be told that you are not obliged to provide your data in a situation like this; you can withdraw your consent again at any time. For more information, please see the 'Your rights' heading below.

### Sharing personal data with others

We only provide data to other organisations if necessary to comply with a statutory obligation or for the purpose of our teaching tasks. We enter into data processing agreements with organisations that we instruct to process your data. This ensures that your data enjoy the same level of protection and confidentiality when they are processed by the organisations in question. We will continue to be responsible for this use of your personal data.

### Children

We do not intend to collect data from website visitors who are aged under 16, unless they have the consent of their parents or guardians. However, our website is not able to check whether a visitor is over the age of 16. Because of this, we recommend that parents and guardians remain aware of the online activities of their children. This avoids situations in which a child's personal data are collected without the consent of his or her parents or guardians.

## Research

We sometimes use personal data, or provide them to others, for research or statistical purposes. There are three possibilities in these situations.

Firstly, we anonymise personal data in most cases, so that no-one knows that your data are being used.

However, if it is not possible to do this when carrying out research, we will ask you for your consent in advance.

Secondly, it may not be possible or advisable to obtain your consent in exceptional cases. This might apply if the amount of time or effort involved would be disproportionate. We will always consider the situation carefully and give you the opportunity to object. In these exceptional cases, we will always anonymise or encrypt your data as well.

Thirdly, if you do not wish your personal data to be processed for research purposes, you can notify us by sending an email to [centralestudentenadministratie@inholland.nl](mailto:centralestudentenadministratie@inholland.nl).

## Specific processing activities

Inholland University of Applied Sciences uses applications to process personal data and also participates in several national student surveys. These applications and surveys process personal data in compliance with the requirements of the GDPR and in accordance with the provisions of any data processing agreements that it has been necessary to enter into. You can find specific information about the privacy aspects of several of these applications and research projects below.

### Moodle

The Moodle learning management system (LMS) is GDPR-compliant. This means that authorisations (i.e. who has access to the system) have been arranged in line with the rules set out in the GDPR.

To ensure the optimal use of Moodle as an LMS, progress reports are produced for lecturers about the study results achieved by a student or group who is or are being supervised. The lecturer in question will have access to a class list (a list of names) in Moodle and will be able to see the activities in which students have participated. These data can be accessed by the course lecturer(s) in question and by the central Moodle administrators for your programme.

### Plagiarism scan (Ephorus)

An examiner or supervising lecturer may use the Ephorus application to carry out a plagiarism scan on submitted work, including theses, to check that not too much has been copied verbatim from existing sources. The results of the plagiarism scan will be set out in a report, together with the source and name of the author of the original text. These personal data will be visible to the student in question, the relevant lecturer/examiner, the team leader for the degree programme, the administrative secretary of the Examinations Board and possibly, if appeal proceedings are initiated, the members of the Examination Appeals Board.

Given the applicable burden of proof, it will not be possible to leave out the name of the original author from the report. The degree programme will decide which documents are to be provided for a plagiarism scan; this will not be specified in advance. A plagiarism scan may be initiated from various applications, such as Gradework, Blackboard, Moodle and Onstage.

Inholland University of Applied Sciences also uses your personal data for several specific purposes that benefit you and enable it to make further improvements to its teaching offer. These specific processing activities are set out below.

### Alumni network

When you graduate, Inholland University of Applied Sciences will use your personal data to inform you, every now and again, about interesting developments in your field, network events organised by Inholland University of Applied Sciences, seminars etc. As this benefits you and will not adversely affect your privacy, we will use the private email address provided by you for this purpose. If you do not want Inholland University of Applied Sciences to keep in touch with you, please notify the Central Student Administration by sending an email to [centralestudentenadministratie@inholland.nl](mailto:centralestudentenadministratie@inholland.nl).

## **HBO MONITOR**

About one-and-a-half years after you graduate, you will be approached to take part in a survey: the HBO MONITOR. This national survey is carried out by the Research Centre for Education and the Labour Market (*Researchcentrum voor Onderwijs en Arbeidsmarkt*, ROA) at Maastricht University and DESAN Research Solutions at the behest of the Netherlands Association of Universities of Applied Sciences (*Vereniging Hogescholen*) and, as such, applies to all universities of applied sciences. The survey generates information for a number of purposes, for example to help secondary school students with their study choices, to obtain information about the employment opportunities generated by university of applied sciences programmes, career prospects etc. The survey generates important information that is used to improve the quality of teaching and degree programmes further and help secondary school students and new students with their study choices. You are free to decide whether or not to take part in the survey. Taking part will not have any adverse effect on your privacy, because the results are anonymised, which means that they cannot be traced back to any of the individuals who take part.

To make this survey possible, Inholland University of Applied Sciences will pass on your address to the ROA after you graduate. If you do not want Inholland University of Applied Sciences to use your email address for this survey, please send an email to [centralestudentenadministratie@inholland.nl](mailto:centralestudentenadministratie@inholland.nl).

For more information about the approach used for the HBO MONITOR and how the survey is carried out, please see [www.hbomonitor.nl](http://www.hbomonitor.nl).

## **National Student Survey (NSE)**

Each year, a National Student Survey (NSE) is carried out under the auspices of the Ministry of Education and Science. You are free to decide whether or not to take part in this survey. The Studielink123 organisation, which carries out the NSE, has put measures in place to ensure that the survey is in compliance with the GDPR. Inholland University of Applied Sciences will provide your personal data to Studielink123 on the basis of a data processing agreement, the legitimate interest of this survey and the information that it generates for the further improvement of teaching. The survey will not infringe your privacy, as research data are anonymised and cannot be traced back to any of the individuals who take part. You are also free to decide whether or not to take part. If you do not want Inholland University of Applied Sciences to use your email address for this survey, please send an email to [centralestudentenadministratie@inholland.nl](mailto:centralestudentenadministratie@inholland.nl).

For more information about the approach used for the NSE and how it is carried out, please see [www.studiekeuze123.nl](http://www.studiekeuze123.nl).

If you have any questions about the applications and surveys above, please contact the Data Protection Officer at [funtionarisgegevensbescherming@inholland.nl](mailto:funtionarisgegevensbescherming@inholland.nl).

## **Your rights**

You have the privacy rights below.

### **Right of inspection of your data**

You have the right to inspect your personal data. You may also ask Inholland University of Applied Sciences to provide you with a breakdown of the personal data being processed, without being required to give a reason for your request. This should make it clear to you how your data are obtained and with which party or parties we might share or have shared your data. You will only be able to request data about yourself, not about others. This will not apply if you are able to demonstrate that you are requesting data on behalf of someone else and/or have been given consent to do so.

### **Right of data rectification, amendment, restriction, portability or erasure**

If the personal data registered is incorrect or incomplete, we can rectify, amend or erase data at your request. However, it will not always be possible to honour your request. This might be the case, for example, if legal proceedings have been initiated and your data will be important to the outcome of these proceedings.

### **Withdrawing your consent**

If you have given us consent to process your personal data, you are free to withdraw this consent at any time. You do this in the same way as the consent was originally granted.

### **Objection to the processing of data**

You can object to the processing of your personal data by asking us not to use your personal data any more. However, it will not always be possible to honour your request. You will be expected to prove that the processing could be detrimental to you.

### **How to exercise your rights**

If you want to exercise one or more of your privacy rights, you must:

- submit a request by post;
- provide proof of your identity at the relevant desk at Inholland University of Applied Sciences.

We will handle your request within one month. If your request is complex, we will need an additional two months.

### **Objections and appeals**

If your request is not honoured, or is not honoured in full, we will always explain why. You will be entitled to have the result of your request set out in a decision and then lodge an appeal against the decision with the controller: the Executive Board of Inholland University of Applied Sciences. The decision issued to you will include instructions on how to do this.

### **Registering a complaint**

If you are unhappy about how Inholland University of Applied Sciences has handled your privacy or processed your personal data, or feel that it has processed your personal data when it should not have done, you can register a complaint with Inholland University of Applied Sciences by sending an email to [functioarisgegevensbescherming@inholland.nl](mailto:functioarisgegevensbescherming@inholland.nl).

If we are unable to resolve an issue together, you will be able to take the matter to court. You can read more about this in our decision regarding your complaint. In addition, you are also free to register a complaint with the supervisory authority, the Dutch Data Protection Authority, if you feel that your rights have been infringed. For more information, please visit the website of the Dutch Data Protection Authority and click on '*Klacht melden*' (Register a complaint).

### **Data Protection Officer**

The Data Protection Officer monitors Inholland University of Applied Sciences' compliance with your privacy rights. If you have any questions about the record of processing activities or would like to report a suspected data breach or privacy abuses, please contact the Data Protection Officer on the general telephone number for Inholland University of Applied Sciences or at [functioarisgegevensbescherming@inholland.nl](mailto:functioarisgegevensbescherming@inholland.nl).

### **Your website visit**

Cookies are placed whenever anyone visits our website. We use technical cookies, functional cookies and analytical cookies. A cookie is a small text file that is stored on your computer, tablet or smartphone when you visit a website for the first time.

The cookies we use are vital to the smooth technical operation of the website and its user-friendliness. Cookies ensure that the website works as it should and remember your preferred browser settings. Cookies are also used to remember your surfing behaviour and preferences, which enables us to improve the services we offer you. However, you can always choose to opt out of cookies by blocking them in your internet browser settings. You can delete all information saved previously in your browser settings as well.

## **More information**

Please see the Privacy Policy and Information Security Policy documents for information about how Inholland University of Applied Sciences handles personal data and the security measures it puts in place.

Please see the Privacy and Information Security page on Insite (intranet) for information about such topics as how we arrange accessibility, privacy and the protection of your data on our website and other online services.

If you have any privacy-related questions, please contact the Data Protection Officer at [functionarisgegevensbescherming@inholland.nl](mailto:functionarisgegevensbescherming@inholland.nl).

For general information about privacy, please see the website of the Dutch Data Protection Authority.