

## **Privacy Statement for Students**

Windesheim University of Applied Sciences processes a lot of personal data of its students. We also exchange data between various parties (e.g. lecturers) to be able to give our students the best possible support and guidance in their learning process. Windesheim attaches great value to exercising due care in sharing information as well as to transparency, so students can see for what purposes and by whom their data is used. This privacy statement outlines the measures taken to achieve this.

Personal data storage and processing is necessary for the performance of our operational processes. However, this should be done with the utmost care, since misuse of personal data can cause great damage not only to students, employees and other parties involved, but also to the university itself. This is why we think it's of great importance to adequately protect the data provided to us and use them for their intended purpose. Windesheim's Executive Board is responsible for adequate processing of personal data. Moreover, each individual employee and student is responsible for exercising due care in dealing with other people's personal data.

Windesheim has appointed a data protection officer, who is responsible for internal monitoring of observance of the current privacy laws and also gives advice. Ms. Anita Polderdijk is Windesheim's data protection officer. She can be contacted by email at: [FG@windesheim.nl](mailto:FG@windesheim.nl).

To make this statement easily available to students, it is published on the Students' Charter page on Sharenet, even though this statement is not actually part of the Students' Charter.

### **Purposes and basis**

We process your personal data because you are registered as a student in one of our higher professional education (hbo) degree programmes. Windesheim processes your data to be able to provide high-quality education, monitor your study progress and supervise your learning process in the best possible way. In doing so, we process only data that are relevant or necessary to meet our statutory obligations.

Any data you share in confidence may be processed or shared with others with your permission only. This goes for instance for data concerning a disability. On this subject, see also the General Student Counselling Code of Conduct (Decision 2017-2018).

To ensure data security and adequate operation of our systems, we also monitor the use made of our ICT facilities. The method of monitoring and accessing this data at the individual level is documented in the 'Integrity Code for ICT staff' and the 'ICT Regulations for Students'. These regulations are applicable to course participants as well.

### **Access to personal data**

Windesheim observes the need-to-know principle for data access. Access is limited to the data individuals need to carry out their specific task.

There are specific authorization profiles for individuals charged with for instance student administration, teaching/lecturing and student supervision. For example, lecturers can access only the data of students in their own classes.

Windesheim makes an email address book available to its staff, students and course participants containing the Windesheim email addresses of Windesheim staff, students and course participants. It's up to you to decide what other information you wish to share through this address book.

We may need to pass your data on to third parties only if proper execution of the (educational) contract you have with us necessitates this, or to comply with a statutory obligation. Organizations we exchange personal data with include:

- DUO: the Education Executive Agency
- The Ministry of Education, Culture and Science
- Higher-Education Inspectorate
- Government institutions
- Municipalities
- Tax authorities
- Studiekeuze123, for the National Student Survey (NSE)
- Parties offering internships
- Study and student associations
- Partner institutions at home and abroad (study and internships abroad)
- The Immigration and Naturalisation Service (IND) for students requiring a residence permit

Windesheim provides personal data to third parties in non-European Union countries (i.e. Third nations) only if the recipient or the recipient country can ensure an adequate data protection level. Windesheim considers the following to be an adequate level:

- The general list of countries providing adequate data protection published by the European Commission. For more information click this [link](#).
- EU-US Privacy Shield for businesses in the US, published by the European Commission in collaboration with the US Department of Commerce. For more information click this [link](#).

Windesheim provides personal data to third parties in countries without an adequate data protection level only in the event of study or internship abroad if proper execution of the educational contract between you and Windesheim necessitates this. We will notify you of any exchange of your personal data.

### **Retention periods**

Windesheim will not keep records of your personal data any longer than necessary to achieve the aforementioned goals. Windesheim will delete personal data when its retention period has expired, unless the data is to be used for historical, statistical or scientific purposes. If that is the case, we will keep records of the data in our files. Windesheim uses the 'Selection list for Universities of Applied Sciences' as the basis for retention and deletion periods.

If personal data is processed following your permission, you always have the right to withdraw your permission. In that event, the data will be processed only to meet a statutory obligation. If no such obligation exists, the data will be deleted.

### **Your rights**

You have various rights in regard to your personal data: the right of inspection, rectification, removal, protection and the right to object to processing of your personal data. Should you wish to exercise these rights, please contact Windesheim's educational-affairs legal department by email: [onderwijsjuristen@windesheim.nl](mailto:onderwijsjuristen@windesheim.nl). You can also submit a request there.

Do you feel that Windesheim generally fails to observe proper procedure in processing your personal data? Then you may want to file a complaint with the Complaints Service: ([klachtenloket@windesheim.nl](mailto:klachtenloket@windesheim.nl)). Does your complaint not produce the desired result? Then the option of submitting a complaint to the Dutch Data Protection Authority is open to you.