

## **Appendix 1: The Processing of Personal Data of Students and Course Participants of the Gerrit Rietveld Academie and Students of the Sandberg Instituut**

### Article 1 Scope

This Appendix develops the Rietveld Academie Data Protection Regulations as regards the processing of personal data of candidates and enrolled students at the Gerrit Rietveld Academie and Sandberg Instituut, hereinafter referred to as 'the Academie'.

### Article 2 Responsible body

The body responsible for the processing of personal data of students is the Executive Board of the Academie.

### Article 3 Contact/internal processor at the Academie

The internal processor of personal data of students is:

1. the Head of Student Affairs (and staff of Student Affairs) in relation to enrolment and study data
2. the Dean in relation to minutes of meetings
3. the senior lecturer of a subject department in relation to student progress data
4. the Controller (and staff of the Finance Department) in relation to financial matters
5. the Head of Facility Implementation in relation to the management and production of student cards
6. the Facility Services Coordinator in relation to application management (Netpay)
7. the Lending Library/Tool-o-Theek in relation to borrowed items
8. the web editorial team in relation to the publication of data of students and alumni on the website
9. the Head of ICT, ICT staff and, following on from this, the external party responsible for managing the technical aspects of databases, application management and systems management and the associated external ICT Help Desk.

### Article 4 External processor

The processing of personal data of students at the Academie may be outsourced to a third party (the external processor), provided the following terms are laid down in the contract:

1. The external processor must provide sufficient safeguards relating to the organisational and technical security of personal data.
2. The external processor may only process personal data on the instructions of the Rietveld Academie.
3. The external processor must comply with all the security obligations upon the Rietveld Academie as the body responsible for processing under the General Data Protection Regulation (*Algemene verordening gegevensbescherming, AVG*).
4. The external processor and persons acting under the authority of the external processor shall keep personal data to which they have access confidential.
5. The external processor is independently responsible, along with the Rietveld Academie, for any harm or detriment occasioned to a person.
6. Agreements with the external processor on the time limit within which he must destroy personal data.

#### Article 5 Databases

The data will be processed automatically or otherwise and stored in databases. Personal data of students will be processed in the following databases:

1. The OSIRIS student information system for registration, enrolment, course participants, exchange and progress records
2. The VisaCare application for applications for and amendments to residence permits
3. The portfolio machines in use at the GRA and SI for candidates for the admissions procedure
4. The DUWO online application for obtaining student accommodation and drawing up tenancy agreements for students and course participants
5. The Nuffic Mobility Tool application for drawing up applications for Erasmus+ scholarships
6. Computer and network databases (e.g. for gaining access to ICT facilities)
7. Lending systems of the Library, the Tool-o-Teek (e.g. for small tools) and the Facilities Lending Service (for audio-visual aids) and the Photography Lending Service (for specific photography equipment)
8. CCTV recordings (the use of CCTV at the Rietveld Academie is laid down in a CCTV protocol)
9. Databases for archiving or document management
10. Records relating to all sorts of support systems, e.g. enrolment in groups, participant in activities
11. Communication databases, e.g. lists of telephone numbers and addresses of students, alumni and ex-students, and databases for other internal management purposes.

## Article 6 Persons concerned

Personal data of the following categories of persons are processed:

1. Students
2. Course participants (contract teaching)
3. Alumni
4. Prospective students and course participants (who have registered for an admission consultation or requested enrolment and/or information)
5. Ex-students, ex-participants and ex-course participants.

## Article 7 The purpose of processing

The purpose of processing personal data is:

1. to organise or provide teaching
2. to supervise, support and monitor the progress of students, and other related purposes such as issuing recommendations on the continuation of studies, including the referral and removal of students
3. to provide or make available educational resources
4. to improve the organisation of teaching
5. to improve student welfare
6. to secure the buildings and grounds
7. to issue student cards and other facilities and set up email addresses and Rietveld accounts
8. to calculate, set and collect tuition, examination and course fees and contributions or allowances for educational resources and extramural activities, including handing over claims to third parties
9. to permit access to both individual and collective student information for the development of student, teaching, marketing or other policy
10. to maintain contacts
11. to send out information
12. to handle disputes and carry out financial auditing
13. for internal management activities
14. to implement or apply statutory rules and regulations
15. to enable requests for data from the following to be met appropriately:
  - i. persons or authorities with duties under public law
  - ii. persons or authorities to whom the body responsible for processing is required statutorily or contractually to supply data.

## Article 8 Data

1. No personal data other than the following may be processed:

2. Surname, forenames, initials, gender, date of birth, address, postcode, place of residence, telephone number, and similar data required for communication, e.g. email addresses and the bank account number of the person concerned and digitised passport photographs
3. The following data on parents, guardians or carers of students/prospective students who are minors: surname, forenames, initials, gender, address, postcode
4. Nationality, place of birth, country of birth, year of arrival in the Netherlands
5. Student number, Citizen Service Number, passport number and expiry date, Studielink number
6. Data on enrolment, e.g. study programme, course, study phase, academic year, type of programme, type of enrolment, first year of enrolment at the institution, date of enrolment/registration, date of and reason for de-enrolment/de-registration
7. Data on prior education, e.g. most recent prior education, including subject cluster, subjects and marks obtained, year in which the prior education certificate was gained, name and address of the school
8. Data on school/education history, e.g. first year of enrolment in higher education, first year of enrolment at institution
9. Data on student progress, e.g. date propaedeutic phase completed, date final certificate gained, performance-related and tempo grant data on whether the standard was met, binding recommendation on the continuation of studies
10. Data on the certificate, completion of the study programme or course or leaving the study programme, e.g. the certificate for the final examination as referred to in Section 7.11 of the Higher Education and Research Act, date certificate gained, date on which a person not issued a certificate for the final examination left the institution
11. Financial data, e.g. invoicing and payment of tuition fees, course fees or examination fees, instalment payment scheme, dates on which tuition fees, course fees or examination fees (or instalments) were paid, invoicing and payment of other charges, loans, awards of grants and graduation fund grants
12. If applicable, data on the student's internship or employer
13. If applicable, data on the student's personal circumstances, including any statements from specialists etc.
14. Any other data which needs to be processed for the application of a statutory rule or regulation

The above list of data is not exhaustive. The recording of personal data may be subject to change as a result of amendments to statutory legislation and/or rules and regulations or due to changes in the organisation.

1. The personal data shall be supplied by the person concerned insofar as possible on registration or enrolment, and recorded and kept up to date in the databases available for this purpose by the Student Affairs and Finance staff departments.
2. The student is also responsible for the timely and correct provision of the data required and for checking that the name, address and place of residence data for both the home address and the correspondence address are correct.

#### Article 10 Purpose limitation

1. In principle all types of data are processed for the aforementioned purposes (Article 7).
2. The digitised passport photograph is an item of personal data that can serve to identify students in relation to the student card with photograph.

#### Article 11 Access to data

1. The following shall have access to the personal data:
  - a. The body responsible for processing
  - b. The internal processors
  - c. If applicable, and only for the specifically designated purposes, the external processors
  - d. If applicable and on application, via the chief processor, the data protection officer.
  
2. The internal processor shall by means of an authorisation grant the various officials referred to in paragraph 1 access to certain parts of the personal data or all the personal data, as required in line with their duties. The officials of the Facility Services Department and officials of the ICT Department responsible for application/systems management shall by means of encryption and password protection in the system grant the various officials access to certain parts of the personal data or all the personal data, as their duties require.

#### Article 12 Provision of data

1. As well as to persons who have access to the database, personal data shall be supplied to:
  - a. the person concerned (solely his/her own data)

- b. senior lecturers and lecturers (solely the personal and enrolment data of the persons concerned under them, and insofar as required in line with their duties and powers)
  - c. other departments including Reception, the Library, the Tool-otheek and the Facilities and Photographic Lending Services (solely personal and enrolment data), insofar as required in line with the duties and powers of the department
  - d. the Student Counselling Service and confidential advisers, insofar as required in line with their duties and powers
  - e. examination boards and the Appeals Board/Disputes Advisory Committee, insofar as required in line with their duties and powers
  - f. committees such as admission committees, insofar as required in line with their duties and powers, and representative bodies, insofar as required in line with their duties and powers.
2. Data from a database that is traceable to identifiable persons may be supplied to:
- a) the Ministry of Education, Culture and Science
  - b) the Education Executive Agency (*DUO, Dienst Uitvoering Onderwijs*)
  - c) the Immigration and Naturalisation Service (*IND*)
  - d) *DUWO* (the student housing corporation)
  - e) Erasmus+/Nuffic
  - f) the Higher Education Inspectorate
  - g) other organisations insofar as there is a statutory basis for this (e.g. Statistics Netherlands)
  - h) other organisations, solely with the consent of the person concerned.
3. Data from databases that are not traceable to identifiable persons may be supplied for scientific, higher education research and statistical purposes.
4. Any other provision of data shall take place solely with the consent of the person concerned.

#### Article 13 Transfer to countries outside the European Union (EU)

Transfer to countries outside the EU is not relevant at the Rietveld Academie. In the event of student exchanges with contracted partner institutions outside the EU the data must be supplied by the persons concerned themselves.

#### Article 14 Data protection

The data protection officer will be informed about how data are to be protected.

#### Article 15 Deletion of data (retention periods)

1. Personal data will on no account be deleted while the course of study on the basis of which the processing takes place is in progress.
2. Once his/her enrolment has ended, all the personal data of the person concerned will be retained or archived for a period of at least five years, unless a longer retention period is considered appropriate or is required under a statutory duty or regulation.
3. Data on students not enrolled at the Academie, following admission or otherwise, will not be automatically deleted from the database and will be used, if necessary in anonymised form, solely for the purpose of internal statistical analyses.
4. CCTV recordings shall be erased no later than four weeks after the recording of the images. Images showing serious incidents may be retained for as long as is necessary for the purpose of an investigation.