



**Regulations for the
protection of personal data
of students and employees
PThU**

Notions

Article 1

1. These regulations understand by:
 - a. *Personal data*: any data relating to an identified or identifiable person concerned;
 - b. *Processing personal data*: any act or any sum of acts relating to personal data;
 - c. *Person concerned*: the person to whom personal data refer;
 - d. *Responsible body*: the Executive Board, which, by itself or together with others, establishes the purpose of the means for processing personal data;
 - e. *manager*: the official who has been designated by the Executive Board to exercise certain tasks and competences within this framework on behalf of the responsible body;
 - f. *sub-manager*: the official, charged with the actual administration of a category of personal data, designated by the manager to exercise certain tasks and competences on his behalf;
 - g. *processor*: the person who processes personal data for the benefit of the responsible body, without being subject directly to its authority;
 - h. *providing personal data*: publishing or making available personal data;
 - i. *consent of the person concerned*: a free, specific expression of will based on information, by which the person concerned accepts that data concerning him are processed;
 - j. *student*: natural person, registered with the Protestant Theological University as student, external student or course participant, as well as the person who has studied at the Protestant Theological University or its legal predecessors;
 - k. *employee*: natural person who is currently employed at or was employed in the past at the Protestant Theological University, as well as the person who carried out activities within the university setting without an appointment.

Data administration

Article 2

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

Article 3

1. The head of the office relating to student matters (bureau studentenzaken: BSZ) is the manager of the categories of data concerning students, kept by the central student administration.
2. The head of the Human Resource management (HR) department of the PThU is the manager of the categories of personal data relating to employees.

3. The managers may assign tasks and competences as mentioned in Article 8 sub 1, 4 and 5 to a sub-manager.
4. Anyone dealing with personal data under the authority of the responsible body or the manager, the manager himself included, in so far as he has access to personal data, only processes data by order of the responsible body, except for deviating legal obligations.
5. Persons intended sub 4 are bound by confidentiality concerning the personal data that come to their knowledge, except for any legal regulation obliging them to disclose information or such following from the necessity of their task.

Gathering and processing data

Article 4

The data concerning students are gathered with a view to:

- a. Administrative actions relating to registration and calculating, establishing and collecting tuition fees and examination fees;
- b. The preparation of policy decisions relating to education;
- c. The compilation of the electoral rolls;
- d. The activities of the departments of the university concerned with student welfare;
- e. Making decisions with regard to the composition of the educational trajectories;
- f. Reporting test results;
- g. Establishing examination results;
- h. Study advice and support;
- i. Despatching information relevant to students;
- j. The security of the housing accommodation rented by the PThU in Amsterdam and the security of the university building in Groningen.

Article 5

The data concerning employees are gathered with a view to:

- a. Execution of the function of employment management and the necessary administrative actions for this;
- b. The preparation of policy decisions by the governing bodies of the PThU;
- c. The compilation of electoral rolls;
- d. The services to employees and for the activities of university departments aimed at the well-being of employees;
- e. Counselling and evaluating employees;
- f. Despatching information relevant to employees;
- g. The security of the housing accommodation rented by the PThU in Amsterdam and the security of the university building in Groningen.

Article 6

1. The data may only be processed in so far as this:
 - a. is not incompatible with the objectives of data collection mentioned in articles 4 and 5 and in accordance with the other stipulations of these regulations, or;
 - b. is carried out with express permission of the person concerned, or;
 - c. is compulsory on the basis of a legal decree.
2. In the assessment whether processing is compatible with the objective for which the data have been obtained, the following will at any rate be taken into account:
 - a. The relation between the objective of the intended processing and the objective for which the data have been obtained;
 - b. The nature of the data at hand;
 - c. The consequences of the intended processing for the person concerned;
 - d. The manner in which the data have been obtained;
 - e. The degree to which suitable guarantees are applied for the person concerned.
3. Further processing of data for historical, statistical or academic objectives is not considered incompatible, if the responsible body has made the necessary arrangements to ensure that further processing only takes place with a view to these specific objectives.

Article 7

1. The responsible body records the processing of data in a register.
2. The register contains at least:
 - a. The name and address of the responsible body
 - b. The objective or objectives of the processing
 - c. A description of the categories of persons concerned and of the data or categories of data relating to these.

Providing data

Article 8

1. The manager provides personal data only to persons and departments or committees within the university community, if this is not incompatible with the objectives of the processing of the data.
2. The Executive Board provides personal data only to persons and organisations outside the university community, if this is not incompatible with the objectives of the processing of the data.
3. Personal data are provided to persons and institutions, if there is a legal obligation to do so.
4. Personal data may only be provided without permission of the person concerned with a view to academic research, if all conditions listed below have been met:
 - a. Asking direct permission is not reasonably feasible;
 - b. The research serves a general purpose;
 - c. The research cannot be carried out without the data concerned;

- d. The person's private life is not violated disproportionately by providing the data and it is certain that the research will not be presented in such a way that the data may be traced back to persons;
 - e. The research is carried out in conformity with a code of conduct applicable to the researcher.
5. The Executive Board may provide personal data of students to the Central Statistics Office and the Higher Education Basic Register, which this office needs for the compilation of statistical surveys in connection with academic education.

Notification

Article 9

1. The responsible body will announce the processing of personal data and of these regulations by means of a general notification and will also indicate how these may be inspected and how further related information may be obtained.
2. The responsible body is obliged to inform the person concerned in advance about the nature of the data which are included in the data processing, as well as about the objectives pursued, taking into account the stipulations of Article 6.

Security and data storage

Article 10

1. The Executive Board takes care of the necessary provisions of a technical and organisational nature for the security of personal data against unauthorised processing.
2. Every manager takes the necessary measures to prevent unauthorised processing of data in his care.

Article 11

1. Personal data are not kept for a longer period than necessary for the realisation of the objectives for which they have been collected and processed.
2. Personal data are kept for a longer period than stipulated sub 1 if this is necessary for historical, statistical or academic purposes, or on the basis of a legal decree, in which case they are kept in a separate registration.

Right of inspection, copy and correction

Article 12

1. Any person concerned has the right to inspect the personal data that have been recorded about him or her. A request to this effect is submitted in writing to the manager in question. If the manager is not known, the request is submitted to the Executive Board.
2. A request for inspection is reacted to within four weeks after submission at the latest.
3. Any person concerned may request and is entitled to a copy of the personal data recorded about him or her, but limited to twice a year. Expenses may be charged for such a request.
4. Any person concerned may submit a written request to the manager for correction of the personal data included about him or her. If the manager is not known, the request is submitted to the Executive Board.
5. The manager corrects the data if they are actually incorrect, incomplete or irrelevant to the purpose for which they have been processed, or in any other way in conflict with these regulations or any legal decree. The person concerned will be notified of this in writing within four weeks of submission of the request, as will be any person who has been provided with erroneous data of the person concerned.
6. If the manager does not implement the requested correction, he motivates his decision in writing to the person concerned within four weeks after receipt of the request.

Objections

Article 13

A decision, as intended in Article 1:3 of the General Act of Administrative Law, made on the basis of these regulations by or on behalf of the Executive Board, may be objected to in writing within six weeks with the Executive Board, P.O. Box 7161, 1007 MC Amsterdam.

Complaints

Article 14

1. If the person concerned is of the opinion that the conditions of these regulations are not abided by to the detriment of his or her interests, he or she can lodge a complaint about this with the Executive Board, P.O. Box 7161, 1007 MC Amsterdam.
2. The conditions of the Complaints Regulations of the PThU and chapter 9 of the General Act of Administrative Law apply.

Final clauses

Article 15

In cases not covered by these regulations, the Executive Board decides.

Article 16

These regulations may be referred to as:

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Enacted by the Executive Board on 3 July 2015

DISCLAIMER

Although every care has been taken to translate the texts of the Dutch regulations accurately, the original texts in Dutch are binding in case of differences in interpretation