

WTS Ideefiks

Privacy policy and description of data processing

Version 1.0

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1. Introduction

This document describes how study association W.T.S. Ideefiks processes, manages and stores the personal data that is gathered at the beginning and during a membership in W.T.S. Ideefiks. Registration and processing of these data is done in accordance with the Dutch version of the General Data Protection Regulation (GDPR). WTS Ideefiks aspires to follow the principles of "privacy by design and default" as closely as possible.

This document contains the English translation of the privacy policy of W.T.S. Ideefiks. Legally, the original Dutch version of this document is in force. The legally binding Dutch version can be found on www.ideefiks.utwente.nl

2. Description of data processing

2.1 Description of the process

New members of W.T.S. Ideefiks fill out a paper registration form to provide W.T.S. Ideefiks with the personal information necessary for the management of W.T.S. Ideefiks. This data is digitized by the secretary and stored in a Google Drive folder. The paper registration forms are kept in the archives of WTS Ideefiks.

2.2 Purpose

WTS Ideefiks uses the personal data of its members to identify them, contact and communicate with them and to give members the opportunity to use the services of W.T.S. Ideefiks. Our aim is to thereby facilitate the participation of members to our activities and to collect membership fees.

2.3 Basis in law

Registration and membership records of WTS Ideefiks is legitimate, based on article 6 of the Dutch version of the GPDR. Below, you can read both the official English and Dutch versions of the GDPR. Be aware that W.T.S. Ideefiks is subject only to the Dutch version of the GDPR, the Algemeene Verordening Gegevensbescherming (AVG).

You can read the full text of the GDPR in English here:

<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32016R0679>

The full text of the AVG in Dutch can be found here:

<http://eur-lex.europa.eu/legal-content/NL/TXT/PDF/?uri=CELEX:32016R0679>

GPDR article 6

Lawfulness of processing

1. Processing shall be lawful only if and to the extent that at least one of the following applies:

- (a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- (b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- (c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- (d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- (e) 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 controller;
- (f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular Where the data subject is a child.

AVG artikel 6

1. The processing is only legitimate if and to the extent that on at least one of the following conditions is met:

- a) the individual has given permission for the processing of his personal data for one or more specific purposes;
- b) the processing is necessary for the performance of a contract to which the data subject is a party, or to take the request of the individual measures before the conclusion of the agreement;
- c) processing is necessary for compliance with a legal obligation to which the controller is subject;
- d) processing is necessary to protect the data subject or of another individual's vital interests;
- e) processing is necessary for the fulfillment of a general interest task or a task in the context of the exercise of public authority dedicated to the controller;
- f) processing is necessary for the protection of the legitimate interests of the data controller or a third party, unless the interests or fundamental rights and freedoms of the

data subject which require protection of personal data, outweigh the interests, particularly if the person is a child.

2.3.1 Consent

When registering, members are explicitly requested by the paper registration form for permission to process the data. The permission granted is in agreement with the processing purposes indicated in this document, as stated in section 2.3. The authorization is determined by checking a checkbox during the registration process of new members. A new member must check this checkbox itself during the registration process. Current members receive by mail information about the changes to this document and AVG as such. If consent is withdrawn, the information provided will be deleted except the data required for reporting to the tax authorities and the name and surname of the member. The data required for reporting to the tax authorities for the statutory period of seven years kept, and will then be destroyed.

2.4 Data covered

2.4.1 Data Recording of W.T.S. Ideefiks

The following data can be recorded in the membership management. This data is provided by the (prospective) member itself, who enters this data in the registration form. The data which are required for the writing are marked with an asterisk (*). Under each data is shown why it is recorded in the membership management.

Name *

The name is combined with the last name and initials required to identify an individual member on matters such as book sales and operations. If the member indicates a first name, it is possible for other users to search through the name of the member on an internal portal.

Last name *

The name is combined with the initials and surname if the need to identify an individual member in book sales and operations. It is also important for the administration which 7 years must be preserved for the tax.

Email address*

The email address is needed as the primary communication channel. Things like the newsletter and information activities are provided via this communication channel.

Phone number

The number is required to quickly and directly contact members.

Membership with another student association at the University of Twente

In case of a membership in another association at the University of Twente, members of W.T.S. Ideefiks pay a reduced membership fee. It is therefore necessary to know whether a member of W.T.S. Ideefiks is also a member of any other University of Twente study associations.

If the member wants to receive the newsletter

Member can choose to receive the newsletter of W.T.S. Ideefiks. The newsletter contains relevant current information about W.T.S. Ideefiks and the University of Twente. The newsletter will be sent via email on a regular basis.

Tax

The finances of W.T.S. Ideefiks are managed and kept in an Excel file. Both ledgers and accounts receivable and accounts payable should be kept for 7 years, as required by the dutch tax authorities. Personal data found herein are: bank account number, name and address. The ledgers and accounts receivable and accounts payable have to be stored both on paper and digitally. WTS Ideefiks is open to the tax authority and will always act in compliance with the dutch tax authorities. This data will be deleted after the legal requirement of seven years ends.

2.4.2 Data recorded during a membership with W.T.S. Ideefiks

Purchases

W.T.S. Ideefiks keeps track of all expenses made by members that have to be repaid to W.T.S. Ideefiks. This happens to make sure that W.T.S. Ideefiks can accurately track and recover these costs from each individual member.

Activities

For some activities that W.T.S. Ideefiks performs, it is necessary to keep a list of attendees when planning these activities and during these activities. One example of such an activity would be a study trip. These lists are to be kept as secure as possible and immediately destroyed after performing the activity.

2.4.2 Sensitive Data

No sensitive personal as defined in Article 9 of the AV are recorded, stored or processed by W.T.S. Ideefiks.

2.5 Distribution of personal data

For some cases, personal data is provided to the board of W.T.S. Ideefiks as well as committees and initiatives within W.T.S. Ideefiks and some external parties, which are explained in this section.

2.5.1 Internally

Personal information is provided within the association to the board, committees and initiatives if this is necessary for them to fulfill their tasks. The exact data that is shared with them will vary by board or committee, by time and by activity. The information is provided in order to facilitate the functioning of W.T.S. Ideefiks as an organization and to plan and execute activities organized by W.T.S. Ideefiks, for example through attendance lists.

2.5.2 External

WTS Ideefiks provides personal information to third parties only when necessary for the implementation of the membership registration or to meet a legal obligation.

University of Twente

The W.T.S. Ideefiks website is hosted by the ICT services of the University of Twente. When using our website, the privacy policy of the University of Twente, located under <https://www.utwente.nl/en/about-our-website/> applies.

Google Services

Membership administration, the work of the committees and board and the financial reporting are done through Google services like Google Drive and Google Docs. The day to day functioning of W.T.S. Ideefiks and the therefore necessary personal data (mailing lists, membership database, backups, etc.) are stored in Google Drive. Google only stores this data and does not process it. W.T.S. Ideefiks will not store personal data files of members longer than necessary for the functioning of the association. Google guarantees to store aforementioned data in compliance with the GDPR. For more information, see <https://www.google.com/intl/nl/cloud/security/gdpr/>

MailChimp

W.T.S. Ideefiks newsletters are sent using the services of MailChimp. MailChimp is a processor of the personal data of WTS Ideefiks. Details about the data processing done by MailChimp can be found in their Privacy Policy and Terms of Use document. See <https://mailchimp.com/legal/privacy/>

Rabobank

Payments and debits to and by members of W.T.S. Ideefiks are processed by Rabobank. Rabobank is a processor of the personal data of WTS Ideefiks. For the Code of Conduct on the processing of personal data by Rabobank, see https://www.rabobank.nl/images/25_versie1_gedragscode_nvz_2913152.pdf

Studystore

Members of WTS Ideefiks can buy textbooks at a discount via Studystore. Studystore collects personal data to offer discounts to members of WTS Ideefiks. However, this happens only at the initiative of the member. the privacy policy of Studystore can be found here: <https://www.studystore.nl/c/privacystatement>

Other

For some activities, such as study trips and the like it may be necessary to occasionally share personal data with other companies or organizations. In these cases W.T.S. Ideefiks will always ask the affected member for permission beforehand. W.T.S. Ideefiks will ensure that the processing of personal data is as safe as possible and only done for the intended purpose.

3. Organization of the data processing

3.1 Security measures

W.T.S. takes data protection seriously and takes appropriate measures to prevent abuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

3.2 Privacy Impact Assessment

W.T.S. Ideefiks does not perform privacy impact analysis. The categories mentioned in Article 35, paragraph 3 of the AVG do not apply to W.T.S. Ideefiks.

3.3 Rights

The AVG established a number of rights for the data provider in articles 15 to 22 of the AVG. This chapter describes the application and implementation of these rights.

3.3.1 Right of access

A member shall at all times have the right to inspect all data W.T.S. Ideefiks stores about them and for what purposes this happens, in accordance with Article 15 of the AVG. Access to the data processing purposes and can be obtained by a written request to the board in the serve. The board of W.T.S. Ideefiks will provide access within one business day.

3.3.2 Right to rectification

Under Article 16 of the AVG right to rectify incorrect personal data. Changes of incorrect data can be done by sending an email to secretary@ideefiks.utwente.nl

3.3.3 Right to erasure (right to be forgotten)

When a member wants his or her data to be erased, he or she can submit a request to the secretary by email to secretary@ideefiks.utwente.nl. The secretary will then prepared the data for erasure. If there are open membership fees, the necessary data will be retained until the fees are paid. Hereafter, the data will be permanently erased within 14 days.

3.3.4 The right to restriction of processing

When a member wants to limit which data W.T.S. Ideefiks processes, he or she can send a request via email to secretary@ideefiks.utwente.nl. The board of WTS Ideefiks then will wipe the requested data from the membership records. When a member wishes to remove in one or more pieces of data necessary for membership registration (see 2.4.1), his or her membership will have to be terminated.

3.3.5 Notification obligation regarding rectification or erasure of personal data or restriction of processing

If rectification, erasure or restriction is applied, the member(s) concerned are notified. This is done via email.

3.3.6 Right to data portability

Members have the right to receive an excel file with all data W.T.S. Ideefiks stores about them by sending a request via email to secretary@ideefiks.utwente.nl.

3.3.8 Automated individual decision making, including profiling

WTS Ideefiks does not in any way makes use of automated decision making. No automated data processing takes place.

3.3.9 Right to object

When a member has any questions or concerns about the data, it can send them to secretary@ideefiks.utwente.nl. W.T.S. Ideefiks also wants it members to be

aware that they have the right to file a complaint with the national regulator, the Authority for Personal Data.

3.4 Data retention period

The data recorded during the registration as a member of WTS Ideefiks will be stored until up to 14 days after the termination of the membership.

3.5 Data Leaks

When a data breach occurs, board members will notify the leak within the AVG deadline of 72 hours. Notification is also being done by the Personal Authority. The board of WTS Ideefiks will make every effort to minimize as much as possible the impact of data breach and (if necessary in cooperation with the University of Twente and external parties) to map out how the data leak could occur, and how in the future can be prevented.