

Sub Privacy Statement for Students and
Participants, October 2018

Health Academy
Radboudumc

Radboudumc Health Academy – Sub Privacy Statement for Students and Participants

This sub privacy statement must be read in conjunction with the [general privacy statement](#) of the Radboudumc Health Academy and is applicable in relation to the processing of the personal data of students and participants by the Radboudumc Health Academy.¹

The Radboudumc Health Academy processes the personal data of its students and participants in order to be able to comply with its obligations as an educational institution and to offer its students and participants the best possible education.

The Radboudumc Health Academy respects the privacy of its students and participants, and ensures that the manner in which data is dealt with within the Radboudumc Health Academy complies with the applicable regulations. In this sub privacy statement for students and participants we inform you – in addition to what is stated in the general privacy statement – specifically about the manner in which the personal data of students and participants is dealt with, the purposes for which this is done, the grounds on which the personal data of students and participants is processed, how that personal data is processed, the rights that you have if your personal data is processed and whom you may approach with any questions or requests concerning your privacy.

What is personal data?

Personal data is any data which says something about an identified or identifiable natural person.

What personal data of yours do we process in your capacity as a student or participant?

The personal data which we process where relevant is:

- contact details (name, residential and email address, and telephone number);
- gender;
- nationality, and date and place of birth;
- unique registration number;
- citizen service number (CSN);
- BIG number;
- bank account number (IBAN);
- information about your study results and progress, and guidance;
- correspondence and interaction data (email and other messages, letters and any other information which is exchanged when you contact us or we contact you);
- employer, position and employment;
- visual images;
- any financial information which you have provided to us.

In most cases it involves data which we have received from you directly. Sometimes we also receive personal data from other parties in so far as that occurs in accordance with the law or if you have explicitly consented to this. Acting at your own request and with your explicit consent, it may also happen that we process your medical data. For example, this may involve data which is required in order to be able to tailor our educational and other services to the individual.

¹ Radboudumc (Chamber of Commerce No. 41055629), having its registered office in Nijmegen, the Netherlands

Purposes of processing

The purposes for which the Radboudumc Health Academy processes the personal data of its students and participants are as follows:

- organizing, planning and providing educational and other services;
- assisting students and participants;
- informing students and participants about relevant matters in relation to programs of study, facilities or other matters related to the Radboudumc Health Academy;
- responding to questions that you may raise;
- dealing with complaints, objections and disputes;
- improving the quality of our educational and other services;
- calculating, recording, collecting or disbursing amounts owed;
- carrying out administrative work and conducting any other internal administrative activities;
- complying with our legal obligations, such as our duty to keep records, retain data and conduct audits.

Your personal data will not be processed without your consent for any purpose that cannot be reconciled with the above-mentioned ones, unless a legal exception applies.

Grounds for processing

The processing of the above-mentioned personal data is based on any of the following grounds:

- such processing must be necessary for the purposes of executing an agreement to which you are party or of taking action at your request before an agreement is concluded;
- the processing is necessary in order to comply with a legal obligation that we have. By registering you have consented to your personal data being processed;
- the processing is necessary for the purposes of safeguarding our legitimate interests or those of any other party, except where the interests or the basic rights and fundamental freedoms of a data subject which make it necessary to protect their personal data weigh more heavily than those interests, in particular, where the data subject is a minor.

The processing of special categories of personal data² will only occur provided that the conditions or grounds for exception which are specifically mentioned in Article 9 of the GDPR are satisfied.

Mandatory or voluntary supply

If we ask you to supply your personal data, where requested we will clarify whether the supply of such personal data is necessary or mandatory and what the actual or potential consequences may be in the event that such data is not supplied. Our basic premise in this respect is that we will not process more personal data than is required for the stipulated purpose.

Exchange with other parties

It may happen that the Radboudumc Health Academy shares your data with other parties for the purposes of performing its duties. In some cases we have a duty to do so pursuant to the applicable legislation and regulations, and it sometimes happens that we ask other parties to help us process your personal data for the purposes mentioned above. For example, in this respect one might consider sharing data with other educational institutions or for the purposes of using ICT applications.

Should the Radboudumc Health Academy share your data with another party who processes that data at the behest of the Radboudumc Health Academy, we will enter into a data-processing agreement with that party which complies with the requirements stipulated in the applicable privacy regulations.

We will not share your data with any other party that would use that data for their own purposes, unless it is necessary to do so in order to comply with a legal obligation or you have consented to this. Neither will we ever sell or rent out your data to any other party.

² Information about health, race, ethnic background, political, religious or ideological convictions, trade union membership, one's sexual behavior or orientation, genetic data and biometric data serving the purpose of uniquely identifying a person constitutes special categories of personal data.

In the event that personal data is processed by another party outside the European Economic Area, measures will be adopted in order to ensure that there is an appropriate level of security.

Automated decision-making and profiling

At present the Radboudumc Health Academy does not employ profiling in combination with fully automated decision-making.

Retention period

We will not store your data for longer than is necessary. We decide on a retention period in accordance with the relevant legislation and regulations. Where there is a discrepancy between legally stipulated or agreed retention periods, the longest one will be employed. If you have any questions or would like to have your personal data erased sooner, this may be possible in specific circumstances. See also the information under the subheading, "Right of rectification and erasure".

Personal data security

The Radboudumc Health Academy adopts appropriate technical and organizational measures to secure personal data against loss or any form of unlawful processing. Measures that are adopted as far as possible in this respect are, amongst other things, encryption, the pseudonymization of personal data, encrypted communication and dealing with personal data in confidence.

YOUR RIGHTS

In your capacity as a student or participant at the Radboudumc Health Academy we offer you the opportunity to exercise the rights conferred on you under privacy law. Below we inform you about these rights and the manner in which you can exercise them.

Right of inspection

You have the right to inspect the personal data pertaining to you which Radboud University processes.

Right of rectification and erasure

In certain circumstances you are entitled to arrange for your personal data to be amended, supplemented or erased in the event that such data is not (or no longer) accurate or if there are no (or no longer any) grounds for it to be processed.

Right of objection

If we process your personal data on the grounds of a legitimate interest or a duty of general interest, you are entitled to object against this.

If you object to the use of your personal data to inform you about the activities undertaken by the Radboudumc Health Academy and similar types of processing, we will always honor such an objection. Your data will then no longer be used for this purpose.

Should you object to other forms of processing your personal data, we will examine whether we are able to accommodate your objection. If the interest which you assert weights more heavily than that which we have in processing (or continuing to process) your personal data, we will cease to process that data. Should we be of the opinion that we have an overriding interest in continuing to process your personal data, we will explain this.

Right of restriction

In certain circumstances you are also entitled to restrict the processing of your personal data. This entails that, where possible, the Radboudumc Health Academy will temporarily 'freeze' the processing of your data. You may invoke this right in anticipation of an assessment of a request for rectification where the relevant data needs to be erased, because processing it would be unlawful but, instead of its erasure, you request a restriction of the processing of that data, provided that the Radboudumc Health Academy no longer requires that data, whereas you still need it for the purposes of a lawsuit (or preparation for one) or in anticipation of the assessment of an objection.

Right to have data transferred

If we process personal data based on your consent or an agreement concluded with you, you are entitled to receive that data supplied by you in electronic form (or to have it returned) in a generally accepted file format. You will then be at liberty to pass the data on to another party.

Revocation of consent

Where we process your personal data based on your consent, you are usually entitled to revoke your consent. We will then immediately cease to process it. The revocation of consent does not apply retrospectively. As such, all processing which has already occurred will remain lawful.

Exercising the aforementioned rights

Should you wish to exercise any of the aforementioned rights, you may approach the Data Protection Officer of the Radboudumc Health Academy at 1loket.rha@radboudumc.nl referring to the GDPR officer.

Except where misuse occurs, the Radboudumc Health Academy will not charge you a fee for exercising any of your rights mentioned above.

Deadlines

In principle, we will respond to your request within one month. In the unlikely event that more time is required to answer your question, we will notify you accordingly within one month. It may happen that because of the complexity of a request and/or the number of requests the deadline for a response may extend to no more than three months.

Identification

We may request additional proof of your identity in the case of any request. This we will do to ensure that we do not supply your personal data to the wrong party, or wrongly modify that data or the manner in which we process it. To ensure that your request is dealt with as smoothly as possible, we will ask you to present proof of your identity.

Individual considerations in the case of each request

We would like to draw your attention to the fact that the rights referred to above are not absolute. Circumstances may occur as a result of which we may not honor a specific request. We will assess each request individually. Should we not or not be able to honor a specific request, we will naturally give notice of this citing reasons for it. Nevertheless, the right of objection to having data used for direct marketing purposes is absolute. As such, deregistering for any commercial communications will be honored whatever the case.

OVERSIGHT

Data protection officer

The Radboudumc Health Academy has a data protection officer (DPO). The DPO oversees compliance with privacy legislation within the Radboudumc Health Academy (and parts of it) and provides advice about privacy legislation. The DPO is independent. The DPO reports directly to the executive board. In addition, the DPO serves as the contact person for any questions concerning privacy both in your capacity as a data subject and in the case of the relevant regulatory authority.

If you have any questions or complaints concerning this sub privacy statement or our privacy policy, you may contact PO Box Privacy by email at privacy@radboudumc.nl.

Regulatory authority

Pursuant to the legislation and regulations governing privacy, you may also submit a complaint to the national regulatory authority, the Dutch Data Protection Authority. You will find the contact details on the website of the Dutch Data Protection Authority (www.autoriteitpersoonsgegevens.nl).