## Privacy Statement Alumni

### Controller:
Executive Board
Mandated: Ir. Drs. H.J.P. (Hilde) Baert (Director Academic Services)

### Data Protection Officer:
M.R.G. (Mosiwa) Herregodts LLM
FG@tilburguniversity.edu
www.tilburguniversity.edu

### Contact details Tilburg University

### Version: 01-02-2019

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## B. Category of the data subject:

- **Alumni**

## C. Processing purposes:

- a. Maintaining contacts with former students, also former members alumni associations.
- b. Keeping an overview of the information sent.
- c. Providing information and communication about the institution's products and services.
- d. Disclosing the activities of the institution or partners of the institution.
- e. Calculating, recording and collecting contributions and donations.
- f. Participating in international rankings.
- g. Access to sportfacilities

## D. Categories of personal data

<table>
<thead>
<tr>
<th>Univ. Fonds</th>
<th>Ranking</th>
<th>e</th>
<th>f</th>
<th>Contact data 1: Name, email</th>
<th>Contact data 2: Date of birth and gender</th>
<th>Contact data 3: Other data</th>
<th>Student number</th>
<th>Nationality and place of birth</th>
<th>Diplomas</th>
<th>Work experience</th>
<th>Financial data (contributions and donations)</th>
<th>Contact(moment)</th>
<th>Biometrics</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>a</td>
<td>e</td>
<td>abc</td>
<td>c</td>
<td>abcde</td>
<td>g</td>
<td>abcd</td>
<td>abcde</td>
<td>abcde</td>
<td>abcde</td>
<td>abcde</td>
<td>abcde</td>
</tr>
<tr>
<td>1a</td>
<td>Contact data 1: Name, email</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>1b</td>
<td>Contact data 2: Date of birth and gender</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>1c</td>
<td>Contact data 3: Other data</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
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</tr>
<tr>
<td>2</td>
<td>Student number</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>3</td>
<td>Nationality and place of birth</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<tr>
<td>4</td>
<td>Diplomas</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
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<tr>
<td>5</td>
<td>Work experience</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>6</td>
<td>Financial data (contributions and donations)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
</tr>
<tr>
<td>7</td>
<td>Contact(moment)</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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</tr>
<tr>
<td>8</td>
<td>Biometrics</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
<td>✔</td>
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</tr>
</tbody>
</table>

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## E. Source documents

<table>
<thead>
<tr>
<th>Name</th>
<th>Description</th>
<th>Website</th>
<th>Location</th>
</tr>
</thead>
<tbody>
<tr>
<td>I Student Information System</td>
<td>50 + 10 years from the last contact moment</td>
<td>Rux Burton Fundraising software</td>
<td>telearise.com</td>
</tr>
<tr>
<td>II Alumni</td>
<td>10 years from the last contact moment</td>
<td>Aery</td>
<td>aery.nl</td>
</tr>
<tr>
<td>III PostNL moving message service</td>
<td>10 years from the last contact moment</td>
<td>Spotler</td>
<td>spotler.com</td>
</tr>
<tr>
<td>IV Public sources</td>
<td>10 years from the last contact moment</td>
<td>Desan</td>
<td>desan.nl</td>
</tr>
<tr>
<td>V Algorithm fingerprint</td>
<td>1 year after ending sports membership</td>
<td>Spotler</td>
<td>spotler.com</td>
</tr>
</tbody>
</table>

## F. Other controllers

- Rux Burton
- Aery
- Spotler
- Desan
- Raiser's Edge
- DMS

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## G. External processors

- DMS
- DARO
- M&C
- FS

### TiU Applications on location

- Access to sportfacilities

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## H. Transfer of personal data outside EU.

- For participating in international rankings with alumni' explicit permission

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## J. General description of the technical and organizational security measures

Security measures are in accordance with ISO 27001 (ISO standard for Information Security). Assessment was carried out on the information security (ISO 27002 checklist), assessment of maturity level 2.4 based on the SURF Assessment Framework (scale 1-5).

### Security measures:

1. **Student Information System**
   - 50 + 10 years from the last contact moment
   - Location: UK

2. **Alumni**
   - 10 years from the last contact moment
   - Location: FR

3. **PostNL moving message service**
   - 10 years from the last contact moment
   - Location: Nl

4. **Public sources**
   - 10 years from the last contact moment
   - Location: NL

5. **Algorithm fingerprint**
   - 1 year after ending sports membership
   - Location: NL

### Retention periods:

- Student Information System: 50 + 10 years from the last contact moment
- Alumni: 10 years from the last contact moment
- PostNL moving message service: 10 years from the last contact moment
- Public sources: 10 years from the last contact moment
- Algorithm fingerprint: 1 year after ending sports membership

### Data processing agreements:

- Rux Burton
- Aery
- Spotler
- Desan
- Raiser's Edge
- DMS

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## Access rights

- Access to sportfacilities

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## Algorithm fingerprint

- 1 year after ending sports membership
- Location: NL
This privacy statement is based on Article 30 of the GDPR (Register for processing activities) and consists of the following parts:

A. Contact details of the organization.
B. Categories data subjects: alumni
C. Processing purposes.
D. Description of the categories of personal data.
E. Source documents, documents with which data subjects consent to the processing of their personal data.
F. Categories of recipients to whom this personal information is or will be provided (external).
G. Data processor(s) who process personal data on behalf of Tilburg University.
H. Whether there is a transfer of personal data outside the EU.
I. Applicable retention periods and moment of destruction of the data.

General description of the technical and organizational information security measures.

**Explanation categories of personal data (D)**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1a</td>
<td>Contact details 1</td>
</tr>
<tr>
<td>1b</td>
<td>Contact details 2</td>
</tr>
<tr>
<td>1c</td>
<td>Contact details 3</td>
</tr>
<tr>
<td>2</td>
<td>Student number</td>
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<td>5</td>
<td>Work experience</td>
</tr>
<tr>
<td>6</td>
<td>Financial data</td>
</tr>
<tr>
<td>7</td>
<td>Contact information</td>
</tr>
<tr>
<td>8</td>
<td>Biometrics</td>
</tr>
</tbody>
</table>

**Lawfulness of processing (examples in parentheses)**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>L</td>
<td>Legality (e.g.: DUO)</td>
</tr>
<tr>
<td>C</td>
<td>Contract (e.g. study agreement)</td>
</tr>
<tr>
<td>E</td>
<td>Legitimate interest (use of applications by Tilburg University)</td>
</tr>
<tr>
<td>Co</td>
<td>Consent, the subject should have been able to make an unambiguously clear decision for or against the processing for one or more specific purposes (e.g.: publication photos on website or brochure).</td>
</tr>
<tr>
<td>V</td>
<td>Vital interest (e.g. life threatening situation)</td>
</tr>
<tr>
<td>P</td>
<td>Task of Public Interest</td>
</tr>
</tbody>
</table>

**Explanation of the AIC**

- A stands for availability. M (middle) indicates that the information is not available for a maximum of 2 days in the event of a malfunction.
- I stands for integrity. L (low) stands for "complete" personal data, M stands for "complete and correct" personal data and H (high) stands for "complete, correct and up-to-date" personal data. All personal data are classified as H.
- C stands for confidentiality. L means that everyone within Tilburg University is allowed to see this information, M means that only designated officials may see personal data in their role (e.g. payroll employees), H only means that employees by name (for example, the manager or consultant) may view personal data.

**What rights does a data subject have as a result of the GDPR?**

<table>
<thead>
<tr>
<th>Rank</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Right to be informed (articles 13 and 14 GDPR)</td>
</tr>
<tr>
<td>2</td>
<td>Right to access (article 15 GDPR)</td>
</tr>
<tr>
<td>3</td>
<td>Right to rectification (article 16 GDPR)</td>
</tr>
<tr>
<td>4</td>
<td>Right to erasure / be forgotten (article 17 GDPR)</td>
</tr>
<tr>
<td>5</td>
<td>Right to restriction of processing (article 18 GDPR)</td>
</tr>
<tr>
<td>6</td>
<td>Right to data portability (article 20 GDPR)</td>
</tr>
<tr>
<td>7</td>
<td>Right to object (article 21 GDPR)</td>
</tr>
<tr>
<td>8</td>
<td>Right not to be subject to a decision based solely on automated processing, including profiling (article 22 GDPR)</td>
</tr>
</tbody>
</table>

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### Privacy explanation alumni

Tilburg University values great importance to the careful processing of personal data.

Processing of personal data is necessary for the operational processes of educational and research institutions.

This privacy statement indicates how we handle your personal data. Tilburg University processes personal data in accordance with the General Data Protection Regulation (GDPR) and the Uitvoeringswet AVG (UAVG).

The processing of personal data is supervised by our Data Protection Officer (DPO) Mr. M.R.G. Herregodts (e-mail: FG@tilburguniversity.edu). Our DPO is registered with the Dutch Data Protection Authority.

**Use of data**

- **A** The basic set of data is obtained and processed on the basis of the legitimate interest of Tilburg University.
- **E** We process various types of personal data from you in the alumni database (The Raiser’s Edge). The majority was obtained via Osiris, the student information system, in which the data also remain. His information is supplemented and / or modified by the alumnus himself, the PostNL moving message service and publicly available sources. We need this information to execute our services towards the alumni group as well as possible and thus meet the wishes and needs of our alumni.
- **I** We will not store your personal data for longer than is permitted by law.

**Provision to third parties**

**D** Tilburg University processes your personal data to ensure that we fulfill our obligations as an alumni agency.

The fundraising section of the DADO department is in the hands of the University Fund, a separate foundation. This foundation manages the funds that DADO recruits for and where DADO also carries out the administration.

**G** For the processing of personal data, Tilburg University can make use of service providers who will act - exclusively on behalf of and for the benefit of Tilburg University - as data processors. We will always conclude a Data Processor Agreement with that service provider in which it compels to the above.

**Collecting information regarding mailings via Spotler**

DADO uses the mailing system Spotler (formerly Mailplus) to send mailings to our alumni. Spotler registers statistics about these mailings, for example whether an email address is still up to date or whether a mailing is effective or not.

DADO uses and registers these statistics to optimize the service in future mailings and to meet the needs and wishes of alumni.

For example, whether or not someone wants to receive invitations from certain events.

**Security**

Tilburg University shall take appropriate organizational and technical measures to ensure that the personal data for which it is responsible is not processed unlawfully. For example, Tilburg University does not send personal data via an unsecured line and we continually monitor our ICT facilities for security incidents. Within Tilburg University there is a Computer Emergency Response Team (CERT) that handles all security incidents (e-mail: cert@uit.nl).

**Change your data**

You can always request your details, have them changed or removed as necessary. You can use the procedures described at www.tilburguniversity.edu/privacy. For questions you can directly contact DADO via alumni@tilburguniversity.edu.

**Changes to this privacy statement**

Tilburg University reserves the right to change this privacy statement. Modified versions will be presented again on the site.

**Questions & complaints**

If you do not agree with how Tilburg University handles your personal data, you can always ask for clarification from our Data Protection Officer (see point A). If, in your opinion, your problem is not solved properly, you can contact the Dutch Data Protection Authority.

**Date:** 01-02-2019