# Privacy Statement Website Visitors

## Contact details Tilburg University

**Controller:**

Executive Board  
Mandated: Drs. H.E. (Hedvig) Niehoff (Director Marketing & Communication)

**Data Protection Officer:**

M.R.G. (Moswa) Herregodts LLM  
FG@tilburguniversity.edu  
www.tilburguniversity.edu

## Category of the data subject:

**Visitors website and social media Tilburg University**

## Processing purposes:

<table>
<thead>
<tr>
<th></th>
<th>Lawfulness of processing:</th>
</tr>
</thead>
<tbody>
<tr>
<td>a. Registration of events</td>
<td>→ Consent</td>
</tr>
<tr>
<td>b. Evaluations of events</td>
<td>→ Legitimate interest</td>
</tr>
<tr>
<td>c. Marketing research</td>
<td>→ Legitimate interest &amp; Consent</td>
</tr>
</tbody>
</table>

## 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).

<table>
<thead>
<tr>
<th></th>
<th>Source documents</th>
<th>Retention periods</th>
<th>Data processing agreements</th>
</tr>
</thead>
</table>
| I | Website forms / Form Assembly | 1 year | 1 Google Analytics  
Anonymous data  
analytics.google.com  
US |
| II | Website statistics | 4 years | 2 Salesforce  
CRM system  
salesforce.com  
EU |

## Categories of personal data

<table>
<thead>
<tr>
<th></th>
<th>Categories of personal data</th>
<th>Other controllers</th>
<th>External processors</th>
<th>TIU</th>
<th>Applications on location</th>
<th>Access rights</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Sales force</td>
<td>GA</td>
<td>Website Form Assembly</td>
<td>M&amp;C</td>
<td>AIC</td>
</tr>
<tr>
<td>I</td>
<td>1 Forms</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>M-H-M</td>
</tr>
<tr>
<td>II</td>
<td>2 Statistics</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>M-H-M</td>
</tr>
</tbody>
</table>
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: students.

**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.

**J** General description of the technical and organizational information security measures.

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### Explanation categories of personal data (D)

<table>
<thead>
<tr>
<th>1</th>
<th>Forms</th>
<th>Forms (name, address, email, telephione) and newsletter registrations Google Analytics has been setup according to the guidelines of the Data Protection Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>2</td>
<td>Statistics</td>
<td></td>
</tr>
</tbody>
</table>

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### TIU Explanations of abbreviations

- **GA** Google Analytics
- **Form Assembly** Software digital forms
- **M&C** Division Marketing & Communication

### Lawfulness of processing (examples in parentheses)

- **L** Legal obligation (e.g.: DUO)
- **C** Contract (e.g. study agreement)
- **G** Legitimate Interest (use of applications by Tilburg University)
- **Co** Consent, the datasubject (visitor) has given unambiguous permission for the processing for one or more specific purposes. (e.g.: publication photos on website or brochure).
- **V** Vital interest (e.g. life threatening situation)
- **P** Task of Public interest

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### AIC 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. I means that everyone within Tilburg University is allowed to see this information, H means that only designated officials may see personal data in their role (e.g. payroll employees), M only means that employees by name (for example, the manager or consultant) may view personal data.

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

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

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### Privacy explanation campus visitors

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.

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### Use of data

- **C** Data that are not required for the execution of the education agreement, the fulfillment of legal obligations and the legitimate interest of our organization will only be processed with your consent. In addition, we will never process more data from you than is necessary for the purposes that we have addressed at point C of the privacy statement.
- **E** We process various types of personal data from you, the majority of which we have received directly from you. We need this information to execute our services towards the website visitors as well as possible and thus meet the wishes and needs of our visitors.
- **I** We will not store your personal data for longer than is permitted by law.

### Provision to third parties

- **F** We do not provide personal data from our website visitors to other controllers.
- **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 processor. We will always conclude a Data Processor Agreement with that service provider in which it compels to the above.

### 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@uvt.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/.

### 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