

# Notice with respect to data protection for Leiden University's alumni

This privacy notice was modified on 24 May 2018.

This notice explains how Leiden University (henceforth "the university", "we" or "our") processes and uses personal data we collect about alumni ("you" and "your"). Developing a clearer understanding of our alumni helps us maintain contact with you to keep you up to date about our activities and developments, to offer you services and to find ways in which you could support us and we could support you.

We do everything we can to protect your personal data and to be transparent about what information we save. The university has a series of policy measures and procedures in place for data protection; an overview can be found <a href="here">here</a>.

The following notice describes how the university specifically uses your personal data and the purposes for which the information is used.

# Personal data stored by the university

If you have obtained an academic degree at our university, we hold personal data about you. The law requires that we keep some of these data, for instance to demonstrate that you obtained your degree. Other data are stored so that we can remain in contact with you.

We can save information about you from a variety of sources. An important part of the information we have on alumni is exactly what you have provided us with (you could provide information by filling in an online form on the university website, or by communicating with us by phone, email or otherwise). If you are or were a student at the university, some of your personal data from your student file are transferred to the university's alumni database.

#### Most records include:

- the programme you are taking/took and the date you received your academic degree;
- unique personal identification data and biographical information (e.g. student number, date of birth, gender);
- your contact details (NAW data, phone number, email address, language preference); we continuously update these if you notify us of any changes);
- details of your interactions with the university, which may include:
  - o possible memberships of study and/or alumni associations;
  - o your presence at university events, insofar as registered;
  - o other contact with us or our partners (as set out below);
  - o any relations with other alumni or donors of the university.
- the name of your partner or spouse, if applicable;



• your communication preferences, to help us offer suitable and relevant communication.

We also record (if applicable):

- Financial information about you, such as:
  - o your history of donations to the university and the LUF;
  - o your IBAN number for regular donations.
- your willingness to contribute as a volunteer;
- information about your career;
- information about your areas of interest and social activities.

We supplement the data retrieved from the university with information from our partners (refer to 'When the university shares your data with others (our partners)' paragraph) and publicly available information.

We use targeted internet searches to acquire and maintain the correctness of the abovementioned data:

- Public sources for companies: company websites;
- Public sources for individuals: social media websites;
- Press sources: national and regional newspapers, radio, TV, news websites.

We have a legitimate interest in processing these data, namely maintaining contact with alumni. We want to stay in contact with you to keep you informed of our university's new activities and events and developments in your field of expertise.

If you disagree with our processing your personal data as an alumnus, you can lodge an appeal (refer to the 'Your rights' paragraph). Exercising these rights is independent of unsubscribing from newsletters.

# How the university uses your data

We want to keep you informed about developments with respect to the university. We also wish to invite you to events that we organise. We use both post and email to contact you for these purposes.

We use your data for a number of interrelated purposes that support alumni relations and fundraising. These entail:

- sending you publications (e.g. alumni magazines and university updates)
- conducting surveys;
- providing services;
- sending you personalised requests for donations;
- sending you information about possibilities for volunteer work, such as mentoring students and organising events;
- inviting you to alumni and other university-related events;
- internal administration, including the management of any feedback or complaints;



• administrative purposes (e.g. processing a donation or managing an event for which you have registered or which you have attended).

# Sending digital newsletters

We send you digital newsletters (per email) in line with Art. 11.7, second paragraph, of the Telecommunications Act. You can click on the unsubscribe link of an email at any given moment. For paper post, we also indicate how you can deregister for receiving such post.

## **Accepting donations**

Before seeking or accepting large donations, we are obliged to exercise the necessary care, which includes looking at publicly available personal data with respect to criminal convictions and offences by the donor.

## Data analysis

We can use automated or customary analyses to cross-link data and help us in identifying your possibilities for supporting the university, to offer you an improved experience, to send you relevant and current information, to identify possibilities or opportunities for volunteer work that may be of interest to you, both to support you and to prevent your being approached with opportunities that are not relevant for you. All of this is in support of the strategic goals relating to the university's research and education. We always aim to make sure that the opportunities we offer you are aligned with your interests, based on the research that we conduct.

## Discontinuation of data processing

We will always respect your request to discontinue the processing of your personal data. Furthermore, your legal rights are set out below.

#### When the university shares your data with others (our partners)

We share data from the above-mentioned categories with the Leiden University Fund ("LUF"), so that we can promote the university's mission by offering expertise in fundraising and alumni relations. The sharing of data with the LUF is regulated in a data processing agreement in compliance with the General Data Protection Regulation (GDPR).

The LUF uses your data to approach you for university activities and for voluntary contributions in terms of commitment, expertise and financial means.

This is based on legitimate interests: the funds contribute to the implementation of our alumni policy.

We will not provide your personal data to other companies or organisations, unless it is necessary for performing our public duty or required by the law (e.g. if the police suspect



you in a crime and demand information, or if an accountant requires access to the alumni administration).

The university will share data on an informed and confidential basis with, if applicable:

- affiliated companies that support alumni and donors, such as:
  - Study associations;
  - o Alumni associations;
  - o Alumni groups.
- organisations or institutions that have awarded you a grant.

## How we protect your data

We ensure that we have data sharing agreements that are in compliance with the General Data Protection Regulation, before providing your personal data to other parties.

In no circumstance will we sell your personal data to third parties, nor do we allow third parties to sell data that we have shared with them.

We also facilitate communication between individual alumni; however, we will not disclose any personal contact details without prior consent.

Each transfer of your data abroad (outside the European Economic Area), e.g. to an international alumni organisation, as set out above, is protected by a so-called 'adequacy decision' pursuant to Art 45 GDPR by the European Commission (in which the receiving country is designated as 'safe area' for personal data).

We take security measures to limit misuse of and unauthorised access to your personal data. Only the necessary people have access to your information. Data access is protected and our safety procedures are supervised by the university's Data Protection Officer. We also make use of secure Internet connections to ensure secure transmission of your data and communication.

#### Your rights

You are entitled to the following rights for which you can submit a request:

- access to your personal data that we process;
- rectifying errors;
- deleting outdated personal data;
- withdrawing consent to receive the newsletter per email.

If you submit a request, please state clearly who you are so that we can avoid modifying or deleting personal data of the wrong person. We aim to respond to your request within four weeks.



# Filing a complaint

If you have any complaints with respect to the processing of your personal data, we would like to hear from you. The university has appointed a Data Protection Officer, who is the internal supervisor and contact point for privacy-related matters within our organisation. The Data Protection Officer can be reached for all your questions and/or complaints by means of the contact details given below.

Based on the privacy law, you also have the right to file a complaint to the national supervisor: the Dutch Data Protection Authority ("Autoriteit Persoonsgegevens").

#### **Further information**

The legal grounds for processing your personal data for the above-mentioned interrelated purposes is that this is necessary for the pursuit of our legitimate interests.

We always process your personal data securely and keep the use of this information to a minimum. Moreover, our use of your personal information for these purposes has no overriding disadvantage for you. There is no legal or contractual obligation for you to provide your personal data.

Our Data Protection Officer can be reached via email privacy@bb.leidenuniv.nl.

# **Retention periods**

We store personal data on our alumni for the same length of time as we hold your details in the examination register, namely for an indefinite period, in relation to your lifelong affiliation to the university. Personal data for which a legal retention period applies will be deleted when the period expires.

# Changes to this privacy notice

If our working method changes, we will also modify our privacy notice. Always keep in mind the date indicated above and regularly check for updated versions. We will do our utmost to announce changes separately.

If you wish to exercise your right to have your data deleted, we will continue to maintain a core of personal data (name, programme and graduating details, unique university identification number and date of birth) to ensure that we do not accidentally contact you in the future, and to maintain your academic record for archival purposes.

We are also obliged, if applicable, to store certain financial details about you for legal purposes (e.g. donations or gifts, fraud prevention and accounting) for the legal retention periods.