

Privacy Statement Codarts

Stichting Codarts University for the Arts (hereinafter: Codarts), having its seat at Kruisplein 26, 3012 CC Rotterdam, the Netherlands, is responsible for the administration of personal data as reflected in this privacy statement.

Privacy Statement

Codarts respects your privacy and processes your personal data according to the requirements of the General Data Protection Regulation (GDPR). With this Privacy Statement we inform you about how Codarts handles your personal data and what your rights are.

Codarts is responsible for the administration of personal data and special category personal data of students and employees of Codarts as intended in the AVG.

The Functionaris Gegevensbescherming (FG) [Data Protection Officer] at Codarts monitors that the administration of personal data by Codarts complies with Dutch privacy legislation.

Types of Personal Data

The following personal data and special category personal data may be collected and processed by Codarts:

- NAW-data [name, address, municipality], place and date of birth, passport photograph, IBAN, student number, correspondence number of OC&W, BSN [social security number], a copy of proof of identity, diploma of previous training;
- data concerning the study and study progress;
- personal data or special category personal data that are required to ensure appropriate coaching of students and employees with regard to their health and well-being;
- insurance information of employees and students, only in case of students staying abroad;
- other legally obligated personal data based on specific legislation (for example, the Law on Higher and Scientific Education (WHW), Tax Law, Law on Identification, and such.

Purposes of Processing Personal Data

Codarts uses personal data for the following purposes:

- enrolment in study programmes or the appointment of employees (this includes providing education and the execution of tasks by employees);
- coaching of students, participants in a course, and employees;
- screening and coaching in case of physical or mental complaints to ensure fitness in participating in the education;
- processing study results, study progress, and related information;
- research;
- processing of requests for information and/or publications;
- implementing and improving services;
- supplying information about current developments, conferences, seminars, and so on;
- recruiting and selection;
- sending out newsletters and/or other information;

- analysing your behaviour on our websites by compiling user statistics in order to improve the websites;
- securing and improving our websites.

Your personal data will only be used for the abovementioned purposes. For all other purposes, Codarts will request your explicit consent.

Codarts processes your personal data based on the following principles:

- you have given your consent. This consent can always be revoked;
- in order to prepare and implement an agreement we have with you;
- legal obligation: Codarts may collect personal data if we are legally obliged to do so, for example because of tax laws;
- Codarts or a third party has a justified interest: we may have a legitimate interest in processing your personal data, for example in solving disputes or in case of a legal procedure.

Processing of Personal Data of Persons under the Age of 16

The Codarts websites, such as www.codarts.nl and www.hmd.nl and/or other services also involve youngsters under the age of 16. This specifically applies to students of the HMD (HAVO/VWO preparatory course). We have no intention of collecting data of these young people, unless their parents or legal guardians have given their consent. However, we cannot check whether visitors of our websites have reached the age of 16 and therefore we advise parents/guardians to be involved in the online activities of their children/wards in order to prevent that data about them are collected without parental consent. If anyone is convinced that we have collected personal data about a minor without this consent, then please contact us through privacy@codarts.nl and we will remove the information.

Rights of Those Involved

As the rightful owner of your personal data (the individual involved) the privacy legislation gives you certain rights, within the limitations of the law. These rights are:

- the right of consultation: you can submit a request to the data protection officer (FG) for a list of the personal data about you that we process and store;
- the right of correction: if we use your personal data wrongly, you may ask us to correct this. Codarts is obliged, though, to be in line with the personal data as administered by the Dienst Uitvoering Onderwijs (DUO), based on the data of the municipal Basisregistratie (BRP) of your place of residence;
- the right to be 'forgotten': you may submit a request to remove your data from the Codarts files. You should take into account that there may be technological and/or legal limitations (for example because of the Archiefwet [Law on Archives]). A request to be forgotten may also be denied on legal grounds or on the basis of stipulations in the agreement;
- the right of data portability: you may submit a request to transfer your personal data to an agency designated by you.

Requests of this nature may be submitted to our DPO via privacy@codarts.nl. We have compiled a number of template letters that you can use to file your request. You can find them here.

Third Party Access

Codarts makes use of service providers for the processing of personal data. These service providers operate exclusively as commissioned by and for Codarts. To this end, Codarts draws up a processing agreement to ensure the same level of security and confidentiality of your data. Codarts remains ultimately responsible for the processing of these data. Apart from this, Codarts does not give third parties access to personal data unless we are obliged to do so on the basis of specific legislation.

Together with such processing agencies as there are, Codarts provides a fitting organisational and technical security of personal data. This guarantees that these data are only accessible to individuals who are authorised to do so because of their position or task. This is also to safeguard that the data are only used for the purposes for which they were collected, and based on law.

Procedure for Reporting Data Leaks

If anyone feels or suspects that personal data of students or employees of Codarts can be accessed by unauthorised persons, they are asked to report this immediately via privacy@codarts.nl. The procedure for analysing, resolving, and possibly reporting data incidents to the Autoriteit Persoonsgegevens [Dutch Data Protection Authority] is then started.

Camera Surveillance, Photographs and Videos at Educational and other Events

Codarts protects your safety and belongings also through camera surveillance in our buildings. Images collected with these cameras are automatically destroyed after one year. If there is reason to suspect a criminal offence, camera images are given to the police. Photographs, videos, and/or vlogs are often produced at educational and other events. These images may be used for knowledge transfer and/or on social media, on our websites, in the newsletter, or in mailings by Codarts about such events.

If photos and video recordings of performances by students are used within the setting of a (cultural) educational task (for example to analyse the performance in class later) no prior permission from the students is required. This is especially true of performances that were open to the public. In all other cases in which students are recognisably portrayed, their permission for publication is required. For example, for using these images in promotional material aimed at attracting new students.

Such videos and photographs are kept as long as they represent an educational, journalistic, or scientific value. The minimum retention period is five years, after which time the value of the material is reassessed every two years.

Cookie Policy, Hyperlinks, and Visual Material

The Codarts websites make use of functional and analytical cookies: simple, small files that are stored on your computer through your browser. In addition, Codarts uses videos on YouTube or Vimeo that may contain tracking cookies. Cookies make our websites load faster and enhance your safety while visiting them. They also provide us with insight into how visitors use our websites, so we can improve them. You can change the cookie settings on your browser if you wish to block cookies during your visit to our websites. This can mean that you cannot use the full functionality of our websites.

Our websites contain hyperlinks to websites of other parties. Codarts is not responsible for the content of these websites, nor for the privacy policy and cookie use of these websites.

Codarts takes every care in using visual material on our websites. In case there is an image to which you object on the grounds of 'portrait rights', please contact us via communicatie@codarts.nl.

Retention Periods

Personal data of students and employees are retained (and deleted) in compliance with the retention periods of the selection lists of the Vereniging Hogescholen (VH) and Codarts' own Instruction Retention Periods, which is based on these lists.

Awareness

Codarts works constantly at increasing the awareness among employees and students about safely handling personal data. Since May 2018, the focus is on handling personal data correctly and securing the information. Every year we organise at least one awareness campaign with regard to privacy and information security aimed at students and employees.

Changes

This privacy statement, the goals and foundations of the processing of personal data are subject to change at any time. We therefore advise you to regularly check the latest version of the privacy statement on our sites for any changes.

More information about Privacy, working with personal data and information security is available on the websites of the Autoriteit Persoonsgegevens (AP).

Viewing, Adapting, or Deleting Data; Raising Objections, Limiting Data Processing, Data Transfer

You have the right to view and adapt your personal data or have them deleted. In addition, you have the right to revoke your prior given consent for processing your data or to raise objections to the processing of your personal data by Codarts, and you have the right to obtain your data. This means that you can file a request to send the personal data we have about you to yourself or an organisation of your choice, as a computer file. You also have the right to request us to limit the processing of your personal data.

Requests to view, adapt, delete, limit, or transfer your personal data or requests to revoke your consent, or objections to the processing of your personal data can be addressed to privacy@codarts.nl. We have produced a number of templates for letters, which makes it easy for you to file a written request.

In order to make sure that a request is submitted by yourself, we ask you to include a copy of proof of identity with the request. In this copy, you must blackout your passport photograph, MRZ (machine-readable zone, the part with the numbers at the bottom of the passport), your passport number and BSN (social security number). This is in order to protect your privacy. We will respond to your request as quickly as possible, but no later than four weeks after you submitted the request.

How We Secure Personal Data

Codarts is serious about protecting your data and we take adequate measures against abuse, loss, unauthorised access, undesired publication, and unpermitted adaptation. If you feel that your data are not adequately secured or if there are indications of abuse then please contact our Privacy Officer (CISO: Chief Information Security Officer) via security@codarts.nl. Codarts takes the following measures to keep your personal data safe:

- security software, like a virus scanner and firewall;
- TLS (used to be SSL): we transfer your data via a secure Internet connection. You can tell from the letters 'https' and the tiny padlock in the address bar;
- DKIM, SPF, and DMARC are three Internet standards that we use to prevent that you receive emails in our name that contain viruses, or spam, or that are intended to obtain your personal data or logon data;
- DNSSEC is an additional security measure (on top of DNS) for converting a domain name to its associated IP address (server name). It comes with a digital signature, a sort of seal, to determine the authenticity of the sender. In this way we prevent you from being re-routed to a false IP address or a fake site.

Questions, Comments, Complaints

The FG (Data Protection Officer) is the designated contact person for privacy issues and can be reached via privacy@codarts.nl.

If you feel that Codarts is not handling your personal data with care or if you think that this privacy statement is not complied with, we ask you to inform us of this first, so we can try to find a solution together. You can file a complaint with our FG via privacy@codarts.nl, or with the Autoriteit Persoonsgegevens (AP) [Data Protection Authority] via their website: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

The Codarts Privacy Statement was last updated on 12 June 2019.