

Privacy statement: Plan for Success

Date: 02-09-2020

The Vrije Universiteit Amsterdam (hereinafter: **VU**) attaches great importance to the protection of your privacy and the security of your personal data. In this privacy statement, we describe how we handle your personal data in the Comenius project 'Plan for Success.' The project aims to improve the study planning of second-year students. It also contains research about the effect of targeted study counselling on study planning and study progress and the extent to which participants experience autonomy in their study planning. We process your personal data in accordance with applicable privacy legislation, including the General Data Protection Act (GDPR) and the General Data Protection Implementation Act.

1. Who is responsible for the processing of my personal data?

Stichting VU is responsible for the data processing operations described in this privacy statement. Stichting VU maintains the Vrije Universiteit Amsterdam as a privately run university in accordance with the Higher Education and Research Act of The Netherlands (*'Wet op het hoger onderwijs en wetenschappelijk onderzoek'*).

Stichting VU has its registered office at De Boelelaan 1105 in (1081 HV) Amsterdam and is registered with the Chamber of Commerce under number 53815211.

2. What (categories of) personal data will be processed?

We will process the following personal data if you participate in the Comenius project 'Plan for Success':

- 1) Primary data
 - a. Gender;
 - b. Age at October first;
 - c. VU-email address;
 - d. Student number;
- 2) Background data
 - a. Highest pre- education;
 - b. High school graduation grades;
 - c. Commuting time of your high school to the VU;
 - d. The activities you took part in to inform yourself about studying at the VU;
 - e. Answers to the VU-matching questionnaire;
 - f. The date on which you enrolled for your studies;
 - g. The number of studies you enrolled for;
 - h. The number of programmes you followed in the last two year;
 - i. The outcome of your language proficiency test;
- 3) Data regarding your study progress and your participation in education and exams
 - a. Study results from the first year and of the coming study year;
 - b. Participation in education;

- c. Participation in exams;
- 4) Data about your participation in the research
 - a. Whether you speak to your study advisor in the context of this research;
 - b. Whether you have taken note of the content of your personal dashboard;
 - c. The agreements you've made with your study advisor about your study planning in context of this research;
- 5) Data on the learner autonomy that you experience in your study planning
 - a. The themes of the questionnaire are autonomy, relevancy of coursework, dialogue teacher-student, dialogue student-peer, and online resources support

3. For which purposes are my personal data processed, and on the basis of which legal grounds?

The personal data will only be used for the following purposes:

- a. Execution of the research Plan for Success
- b. Use of the dashboard Plan for Success for study planning by the study advisors and participating students of the Faculty of Behaviour- and Movement Sciences and the School of Business and Economics.

We process your personal data on the basis of the following legal grounds:

- You have given consent to the processing of your personal data. In that case you have the right to withdraw your consent at any time by contacting us via the contact details below.

4. Who has access to my personal data?

The primary data (1), the data about your study progress and participation in education and exams (3), and the data about your participation to the research (4) are known by your study advisor(s) who help you with your study planning, the contact person of your faculty who you can reach with questions about the research, the researchers of the VU and developers of team VU Analytics who develop the dashboard. The background data (2) are known by the developers of team VU Analytics and the VU researchers. The researchers know the questionnaire data about learner autonomy (5) of the VU.

5. Will my personal data be shared with third parties?

When processing your personal data, we may use service providers (processors) who process your personal data on behalf of and under the responsibility of the VU. The VU concludes processing agreements with these service providers to ensure that your personal data is processed carefully, securely and in accordance with the General Data Protection Regulation (GDPR). We remain solely responsible for these processing activities.

Your personal data will not be shared with other parties. We do share the evaluation of the dashboard and conversations with the study advisor by participating students in 'Plan for Success' with the researchers of the KU Leuven. These data are anonymous, meaning that they are not traceable to individual students.

6. Will my personal data be transferred to countries outside of the European Economic Area?

No, your personal data will not be transferred to international organisations or countries outside the European Economic Area (EEA). The EEA includes all EU countries plus Norway, Liechtenstein and Iceland. Transfers of personal data between these countries are not subject to additional rules under the General Data Protection Regulation (GDPR).

7. For how long will my personal data be retained?

We store your personal data up to ten years after completing the research to achieve the goals stated under 3.

8. How will my personal data be secured?

The VU takes appropriate technical and organizational measures to protect your personal data against loss and any form of unlawful processing.

The VU has a Code of Practice for the use of study data. The Code of Practice applies to this project. The dashboard of Plan for Success works on a secure server of the VU, is secured with multi-factor authentication, the content of the dashboard is only accessible for the authorized users (the study advisors can see all participating students of their faculty, the participating students can only see their own data, employers of VU Analytics manage the application and therefore all data of participating students). Previously to the dashboard going live, a pen-test has been conducted.

9. Who can I contact with questions about the processing of my personal data?

You can ask questions about how we process your personal data via vu-analytics@vu.nl.

10. How can I exercise my privacy rights?

On the basis of the GDPR you have the right – under certain conditions – to access your personal data that we process, to correct your personal data if it contains factual inaccuracies, to delete your personal data, to limit the processing of your personal data, to portability of your personal data and to object to the processing of your personal data.

If you wish to exercise any of these privacy rights, you can contact the Data Protection Officer of VU Amsterdam via:

Data Protection Officer
De Boelelaan 1105
1081 HV AMSTERDAM
functionarisgegevensbescherming@vu.nl

To be able to deal with your request, you will be asked to provide proof of identity. In this way it will be verified that the request has been made by the right person. If you are not satisfied with the way in which we deal with your personal data, you have the right to submit a complaint with a supervisory authority.
