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communiqué

Study Association for Communication Science

PRIVACY DOCUMENT

STUDY ASSOCIATION COMMUNIQUÉ

BMS COMMUNIQUE
TWENTE UNIVERSITY
De Zul 10

Studievereniging Communiqué, located at

Cubicus, room B105
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is responsible for the processing of personal data from www.sacommunique.nl as shown in this privacy statement

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1.1	1 June 2018	P.H.J. (Pim) Vriens	English Translation Information about Informer has been added

Distribution list

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References

Version	Date	Autor(s)	Titel

Table of Content

Contact.....	1
Document history.....	2
Distribution list.....	2
References.....	2
Table of Content.....	3
1. Introduction.....	5
2. Description of the data processing.....	5
2.1 Basis.....	5
2.2 Involved data.....	5
2.2.1 Data from an external source.....	5
2.2.2 Personal Data.....	5
2.3 Special and / or sensitive data.....	8
3. Privacy related law.....	8
3.1 Processing goals.....	8
3.2 Automated decision-making.....	9
4. Storage of personal data.....	9
4.1 Bewaartermijnen.....	9
4.1.1 Tax authorities laws.....	11
4.2 Sharing of personal data with third parties.....	11
4.2.1 Congressus.....	11
4.2.2 MailChimp.....	12
4.2.3 Rabobank.....	12
4.2.4 Informer.....	12
4.2.5 Studystore.....	12
4.2.6 Dropbox.....	12
4.2.6 Others.....	12
5. Cookies, or comparable techniques, that we use.....	13
6. See, change or remove personal data.....	13
6.1 Rights of involved people.....	13
6.1.1 Right of access by the data subject (article 15).....	13
6.1.2 Right to rectification (article 16).....	13
6.1.3 Right to erasure (Right to be forgotten) (article 17).....	13

6.1.4 Right to restriction of processing (article 18).....	14
6.1.5 Notification obligation regarding rectification or erasure of personal data or restriction of processing (article 19)	14
6.1.6 Right to data portability (article 20)	14
6.1.7 Right to object (article 21).....	14
6.1.8 Automated individual decision-making, including profiling (article 22)	14
6.2 Contact in response to the rights	14
7. How we protect personal data.....	15
7.1 Dataleaks	15

1. Introduction

This document describes how the data processing by Studievereniging Communiqué takes place. The data processing includes all the personal data of the members of Studievereniging Communiqué. The personal data are stored in the membership database, and are processed by the boardmembers of Studievereniging Communiqué

2. Description of the data processing

Studievereniging Communiqué processes personal data because members use their services and / or because they provide this information to Studievereniging Communiqué.

2.1 Basis

The processing of the members' data is lawful, based on the following basis:

Article 6, paragraph 1a of the GDPR, a member of Studievereniging Communiqué grants access to data processing manager Studievereniging Communiqué for the processing of members administration.

2.2 Involved data

2.2.1 Data from an external source

Studievereniging Communiqué does not use data from external sources. All available personal data are provided by the members themselves, and with the exception of the obligatory data, they themselves determine what information they provide.

2.2.2 Personal Data

Below you can find an overview of the personal data that Studievereniging Communiqué processes of its members. They are provided with a brief explanation.

- First and last name (Required)
 - o To identify a member, their first and last name is required. Identification is for example required for book sales, mailing, participation in activities and direct debits.
- Initials
 - o The initials are required to identify a member. The initials must be kept for the tax authorities (Belastingdienst).
- Student number (Required)
 - o The student number is used to confirm that the member is studying at the University of Twente. In addition, the student number is the same as the member's login name, and is used to confirm direct debits.
- Gender (Required)
 - o For the completeness of the member administration and the identification of the member, it is important to know the gender of the member.

- Date of birth
 - o The birth date of a member is necessary to know if a member can participate in an alcohol-related activity, but also to know whether the member is 16 years or older. More information about this can be found in article 2.3.
- Address data
 - o Address data are required for communication by mail. Think of the Christmas card for active members, but also communication with former boardmembers.
- Photo
 - o A photo can be added by the member to complete his account. This is displayed on the account of the member, but also in the online almanac or with comments.
- Mobile phone number
 - o The phone number of a member is used to contact the member. Think of providing information about activities, but also as a reminder when not responding to mail.
- Home phone number
 - o If the mobile phone number does not work, or if the member does not have a mobile number, it is useful to be able to contact the member via the home phone number. That is why the home phone number can also be added.
- E-mail address (Required)
 - o The e-mail address is required as the primary means of communication. Information about activities, direct debits, the monthly newsletter, invitations to GMA's and general communication is done via email.
- IBAN / Account number (Required)
 - o The IBAN number is required for direct debits, such as the annual membership fee and participants' contributions for activities.
- BIC (Required for international members)
 - o In order to be able to make direct debits with foreign members, it is necessary to have the BIC number of them. In this way they can also be a full member of the Studievereniging Communiqué.
- Nationality (Required)
 - o To make the communication to the member as optimal as possible, it is important to know whether the member is of Dutch or from international origin.
- Signature of the member (Required)
 - o The member's signature must have been set to the 'Mandate for recurrent collections'. This file must be provided with a signature before the membership is activated.

- Whether or not being a member of another study association
 - o In order to determine whether a member is a primary or secondary member, and therefore qualifies for a 50% discount on his membership, it is important to know whether a student is a member of another study association or not. If this is the case, the student pays 50% less membership fee than primary members of the Studievereniging Communiqué.
- Whether or not agreeing with the online conditions of membership of Studievereniging Communiqué (Required)
 - o The member must agree with the online conditions of Studievereniging Communiqué. This is mandatory, if a member does not agree with this, it will not be possible to become a member.
- Whether or not the member's details are visible in the online almanac, more specifically the visibility of address data, telephone number (s), e-mail address (s), date of birth and / or other information.
 - o For details listed above, it is possible to give permission for publication thereof. Other logged in members then have access to this data.
- Whether or not willing to receive mailing
 - o A member can choose whether or not he / she wants to receive mail. This concerns mailing besides the newsletter.
- Whether or not willing to receive SMS messages
 - o The member can choose whether or not he / she wants to receive SMS messages. This contains information about activities and events.
- Whether or not willing to receive confirmations of participation in events
 - o A member can choose whether or not he / she wants to receive mail about activities for which he is registered. This concerns mailing such as a registration confirmation, unsubscribe confirmation or mailing about adjustments of the activity.
- Whether or not to receive notifications regarding comments that the member has written
 - o A member can choose whether or not he / she wants to receive mail regarding comments he has placed on the website. When someone responds to this, the member can receive a notification of this via email if required.
- In which 'group (s)' a member is.
 - o Members can be placed in groups, so that communication is easier. Think of groups such as in which board or committee the member has been. Information from groups is visible to all members in this group.
- In which activities a member was and will be present
 - o The activities overview keeps track of what activities a member has participated in. This information is used to draw up direct debits, but also to collect feedback about this activity. Both directors and members themselves have access to this.

- Which mailing a member has received
 - o The communication overview keeps track of which mailing a member has received. This information is very valuable to the board, so it is clear to them whether the member is aware of activities and whether they have read the mail.

The personal details as mentioned above belong to the members of Studievereniging Communiqué, in other words persons who have become members either through a paper membership form or the online membership form. If 'Required' has been added, this means that the data must be filled in. If not required, a member is free to add / accept it or to omit it / not to accept it.

2.3 Special and / or sensitive data

The website of Studievereniging Communiqué does not intend to collect data of website visitors who are younger than 16 years old. Unless they have permission from parents or guardians. However, Studievereniging Communiqué can not check whether a visitor is older than 16 years old. Parents are therefore advised to be involved in the online activities of their children, in order to prevent data about children being collected without parental consent. If you are convinced that Studievereniging Communiqué has collected personal information about a minor without this permission, please contact secretary@communiqué.utwente.nl, this information will be deleted.

3. Privacy related law

Studievereniging Communiqué determines the purpose of the processing of personal data. That makes Studievereniging Communiqué the processing responsible. Personal data will only be processed by Studievereniging Communiqué, more specifically by the board of the study association, as appointed during a General Members Meeting. Boardmembers of Studievereniging Communiqué are responsible for the personal details of members and are the only ones who have access to them.

3.1 Processing goals

Studievereniging Communiqué processes personal data for the following purposes:

Goal	Example(s)	Personal data
Financial settlement	<ul style="list-style-type: none"> - Collect membership fee - Collect activity contribution - Transfer declarations by members 	<ul style="list-style-type: none"> - Bank account number - First and last name - Emailaddress - Student number - Whether or not being a member of another study association
Sending of the monthly newsletter	Does not apply	<ul style="list-style-type: none"> - First and last name - Emailaddress - Whether or not willing to receive the newsletter
Communication to members	<ul style="list-style-type: none"> - Calling / texting / WhatsApping / e-mailing regarding activities 	<ul style="list-style-type: none"> - First and last name - Email address - Phone number

	<ul style="list-style-type: none"> - Calling / texting / Whatsapping / e-mailing to be able to perform our services 	<ul style="list-style-type: none"> - Whether or not willing to receive emails
(the possibility of) creating an account	<ul style="list-style-type: none"> - Register for activities - Find summaries - Access to photos of activities 	<ul style="list-style-type: none"> - Student number - First and last name - Gender - Email address - Bank account number
(the possibility of) purchasing study books with a discount	Will be added once contact has been made with Study Store	
To act as optimally as possible to the member's personal preferences	<ul style="list-style-type: none"> - Communicate to members as efficiently as possible 	<ul style="list-style-type: none"> - Whether or not willing to receive mailing / SMS messages - Whether or not willing to receive confirmations of participation in events - Whether or not willing to receive notifications about comments that a member has written - In which 'group (s)' a member is placed. - In which activities a member participated and will participate in - Which mailing a member has received - The status of the member (candidate member etc)

3.2 Automated decision-making

Studievereniging Communiqué does not make decisions based on automated processing on matters that can have (significant) consequences for individuals. This concerns decisions taken by computer programs or systems, without involving a person (for example, a boardmember of Studievereniging Communiqué).

4. Storage of personal data

Studievereniging Communiqué does not store personal data for longer than is strictly necessary to achieve the goals for which the data are collected. Studievereniging Communiqué uses the following retention periods for the following personal data:

4.1 Bewaartermijnen

Goal	Data	Storage period	Manner of storage
Financial Settlement	<ul style="list-style-type: none"> - Bank account number - First and last name - Emailaddress - Student number - Whether or not being a member 	For the sake of the tax authorities, these data are retained for 7 years, see article 4.1.1	The finances of Studievereniging Communiqué are processed in Informer (article 4.2.4). Data in Informer is stored for 3 years and then deleted.

	of another study association		<p>There is also a (monthly) backup, this file is stored on a USB stick and stored in the vault of Communiqué. Only the treasurer has access to this.</p> <p>Declaration forms, which contain name, bank account number and email address, are stored in a closed cupboard in the club room, which only drivers have access to.</p>
Sending of the monthly newsletter	<ul style="list-style-type: none"> - First and last name - Emailaddress - Whether or not willing to receive the newsletter 	<p>Does not apply</p> <p>Up to 1 month after sending newsletter. This is to gain insight into the behavior of members</p>	<p>Recipient list is compiled in Excel based on the current member database and stored on a PC of the board. This list will be deleted after sending the newsletter.</p> <p>This list is imported into Mailchimp (see 4.2.2). After a month, the recipient list is removed from MailChimp.</p>
Communication to members	<ul style="list-style-type: none"> - First and last name - Email address - Phone number - Whether or not willing to receive emails 	<p>Up to 11 months after termination of membership. A member has the right to continue the benefits from a membership at study association Communiqué after terminating membership until the end of the academic year. However, mailing to logged-out members will stop immediately.</p> <p>Communication to members will also stop if a member specifically requests this or if he / she indicates this online. This can be done at any time.</p>	<p>All members' data will be retained until the end of the academic year after deregistration. These are stored in the members database of Congressus (see 4.2.1). Data on paper is also retained on the 'Mandate for recurrent collections'. These signed forms are stored in a closed cupboard in the club room that only drivers have access to. These forms will be destroyed upon cancellation of the membership.</p> <p>If a member indicates that he no longer wishes to receive a mailing, the member's details are retained as described above.</p>
(the possibility of) creating an account	<ul style="list-style-type: none"> - Student number - First and last name - Gender 	<p>See above</p> <p>Once a month a backup is made of the</p>	<p>See above</p> <p>This backup consists of an Excel file with all the data of all</p>

	<ul style="list-style-type: none"> - Email address - Bank account number 	member administration. This replaces the version of the previous month. This file contains all the details of the member. This is done to prevent losing the entire administration in the event of a crash in the members database.	members in it. This file is stored on the PC of the board, which only the board has access to.
(the possibility of) purchasing study books with a discount	Will be added as soon as Study Store replies		
To act as optimally as possible to the member's personal preferences	Various preferences in the member's personal account	See 'Communication to members' and '(the possibility of) creating an account'	See 'Communication to members' and '(the possibility of) creating an account'

4.1.1 Tax authorities laws

The finances of Studievereniging Communiqué are kept in an accounting program. Both the general ledgers and the debtors / creditors administration must be retained for 7 years, as included in the tax legislation. Personal data that can be found here are:

- Bank account number
- Name
- E-mail address
- Student number

The ledgers and debtors / creditors administration must be available on paper as well as digitally. Studievereniging Communiqué is open to the tax authorities and will fully commit to meeting the requirements and conditions of the tax authorities at all times.

When the statutory period of 7 years has elapsed, the personal data will be deleted.

4.2 Sharing of personal data with third parties

Studievereniging Communiqué provides data only to third parties if this is necessary for the implementation of the agreement with members or to comply with a legal obligation.

4.2.1 Congressus

All personal data is stored via the Congressus member system. Congressus is a processor of the personal data of Studievereniging Communiqué. Details about the data

processing by Congressus can be found in the processor agreement between Congressus and Studievereniging Communiqué.

4.2.2 MailChimp

Newsletters from Studievereniging Communiqué are sent with the services of MailChimp. MailChimp is a processor of the personal information of Studievereniging Communiqué. Details about the data processing by MailChimp can be found in the Privacy Statement and the Terms of Use document of MailChimp.

4.2.3 Rabobank

Payments and direct debits with members of the Studievereniging Communiqué are processed by Rabobank. Rabobank is a processor of the personal data of Studievereniging Communiqué. Details about the data processing by Rabobank can be found in the Code of Conduct for the Processing of Personal Data of Rabobank.

4.2.4 Informer

The accounting of Studievereniging Communiqué is processed with Informer's services. Informer is a processor of the personal information of Studievereniging Communiqué. Details about the data processing by Informer can be found in the processor agreement between Informer and Studievereniging Communiqué.

4.2.5 Studystore

One of the services of Studievereniging Communiqué is the sale of study books. This is done via an external party, namely Studystore. Studystore collects student numbers in order to give a discount to members of the Study Association Communiqué. Details about the data processing by Studystore can be found in

Waiting for response from Studystore

4.2.6 Dropbox

The daily actions of the Studievereniging Communiqué, and the personal data used (eg mailing lists, membership records, commission reviews, etc.) are stored in the cloud via Dropbox. Dropbox does not process this data, but only stores it. More information about Dropbox can be found in their Privacy Policy and Terms of Service on their website. Studievereniging Communiqué will not store files with personal data of members for longer than necessary for the functioning of the association, as described in article 4.1.

4.2.6 Others

It is possible that Studievereniging Communiqué occasionally shares personal data with external companies. Think of situations such as the annual Europe trip, a study tour, or requesting personal data from the University of Twente. In these cases, members' information is shared, and the board of Studievereniging Communiqué will focus to it that this is done strictly for the necessary purposes only. It is not possible to make a

general policy for this, because every situation is different. We will look at how this can be done as safely as possible for each situation.

5. Cookies, or comparable techniques, that we use

Studievereniging Communiqué only uses functional cookies. And analytical cookies that do not infringe privacy. A cookie is a small text file that is stored on the computer, tablet or smartphone during the first visit to this website. The cookies that Studievereniging Communiqué uses are necessary for the technical functioning of the website and the ease of use. They ensure that the website works properly and remember, for example, preferences. Studievereniging Communiqué can also optimize the website. A member can opt out of cookies by setting up the internet browser in such a way that it does not store cookies anymore. In addition, all information previously stored via the settings of the browser can also be removed.

6. See, change or remove personal data

A member has the right to view, correct or delete personal data. You can do this yourself through the personal settings of your account. In addition, a member has the right to withdraw any consent to the data processing or to object to the processing of personal data by Studievereniging Communiqué and they have the right to data portability. This means that members can submit a request to send the personal data that are available to them in a computer file to the member.

6.1 Rights of involved people

In the GDPR, multiple rights are set for the data provider. This concerns articles 15 up to and including 22 of the GDPR. The applications and implementation of these rights are explained below.

6.1.1 Right of access by the data subject (article 15)

A member is entitled at any time to inspect according to article 15 of the AVG. Access to the data and processing purposes can be obtained by submitting a written request to the board of study association Communiqué. The board will then provide this inspection as necessary as possible.

6.1.2 Right to rectification (article 16)

According to Article 16 of the AVG, a member has the right to rectification of incorrect personal data. A member can change personal details in the membership admitting via the website of the Studievereniging Communiqué.

6.1.3 Right to erasure (Right to be forgotten) (article 17)

If a data subject wishes to have his or her data erased, a request can be submitted to the board of Studievereniging Communiqué. This will then prepare the data for removal. Unlike in Article 4.1, a member is immediately removed from the system in this case. The member can then no longer make use of the facilities offered by the studievereniging Communiqué, and can therefore no longer log in to his account. When

studievereniging Communiqué no longer has data from a member, this member is no longer a member.

6.1.4 Right to restriction of processing (article 18)

If a data subject wishes to limit his or her data processing, a written request can be submitted to the board of Studievereniging Communiqué. The board of Studievereniging Communiqué will then delete the desired data from the membership administration. A member can also delete a number of data from the membership records himself. All data can be removed from the membership records, with the exception of the mandatory data as described in 2.2.2. If a member wants one of the data to be removed from the membership administration, the membership will have to be terminated.

6.1.5 Notification obligation regarding rectification or erasure of personal data or restriction of processing (article 19)

If rectification, erasure or limitation has been applied, the person concerned will be informed accordingly. This is done by sending a written message to the member by e-mail

6.1.6 Right to data portability (article 20)

The person concerned can request his details on the website of the Studievereniging Communiqué. Here all data is visible which can be processed. In addition, an Excel file of all data known to Studievereniging Communiqué can be requested from the board of Studievereniging Communiqué.

6.1.7 Right to object (article 21)

The person concerned can raise the objection of processing to the board of Studievereniging Communiqué. Subsequently, the processing of data entered by the data subject will be stopped. If the person concerned raises objections to processing concerning the mandatory data mentioned above, this will amount to termination of the membership

6.1.8 Automated individual decision-making, including profiling (article 22)

As already mentioned in 3.2, study association Communiqué makes no use of automated decision-making in any way. With every processing operation there is human input.

6.2 Contact in response to the rights

If a member wishes to make use of his right to objection and / or right to data portability, or if the member has other questions / comments about the data processing, he can send a specified request to secretary@communiqué.utwente.nl.

Studievereniging Communiqué also wishes to point out to members that they have the opportunity to submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. This can be done via the following link:

<https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

7. How we protect personal data

Studievereniging Communiqué takes the protection of data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

7.1 Dataleaks

When a data breach takes place, the board of Studievereniging Communiqué will inform the relevant members as soon as possible of the leak. The board of Studievereniging Communiqué will make every effort to limit the consequences of the data breach as well as possible and (if necessary in cooperation with system management and external parties) to map out how the data breach has taken place, and how this can be done and how in the future this can be prevented.