

# Thematic Privacy & Personal Data Protection Policy—Processing Personal Data

## External Relations



# Readers' Guide

This Thematic Policy on communication with External Relations is part of the **Privacy and Personal Data Protection Policy** and describes, for marketing and communication purposes, the way in which Tilburg University implements the General Data Protection Regulation (GDPR) on the protection of Personal Data and the requirements in the Telecommunications Act.

We distinguish the following categories and external relations:

- Potential/Prospective students
- Students
- Corporate Relations
- Alumni

This Policy has been drawn up on the basis of answering a number of questions, and it is, therefore, important that employees consult the **Privacy & Personal Data Protection Policy** if they need further information.

All information regarding European legislation (GDPR) and the Protection of Personal Data is included on a [Tilburg University website](#), including Frequently Asked Questions. Practical details and examples can also be found on this website.

This Policy includes references to other policy documents. These are marked as “**referrals**” or as [links](#).

Each School/Division within Tilburg University has appointed [Data Representatives](#). They are the first point of contact for employees in case of questions about the Protection of Personal Data.

When he is referred to in this Policy, it is understood to mean he/she or gender-neutral.

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# 1. Introduction

1	<b>What is an item of Personal data?</b>	<p>An item of Personal Data is <b>any information that can identify a natural person or information that can be traced back to that person now or in the future.</b></p> <p>This may be the name, ANR, or other data that uniquely identifies an individual. However, it may also be a combination of a number of data that cannot be traced back to a natural person on their own but can be traced back in combination, or they can be traced back to a person in the future in the form of, for example, technical possibilities, the so-called “Traceable Personal Data.” The combination of, for example, place of residence, age, number of children, and occupation can be traced back to a person. When it comes to data that relates to an individual, it quickly becomes Traceable Personal Data.</p> <p>A number of types of Personal Data for which additional processing requirements apply are</p> <ul style="list-style-type: none"><li>• Special Personal Data (see below)</li><li>• Sensitive Personal Data: this is Personal Data that by its nature is sensitive due to, for example, the risk of fraud. Some examples are BSN number, information on functioning (study results, performance interviews), financial data (assets, salary, etc.)</li></ul>
2	<b>What is an item of Special Personal Data?</b>	<p>In the GDPR, a distinction is made between ordinary and Special Personal Data. Special Personal Data are data that are particularly sensitive by their nature, such as data on race, medical data, and data on sexual orientation. <b>There is a total ban on the Processing of Special Personal Data, unless strict conditions are met.</b> For more details on Special Personal Data, see the <b>Privacy &amp; Personal Data Protection Policy, Chapter 4.3.</b></p> <p>It is, therefore, <b>not permitted</b> to process Special Personal Data (such as medical data) in the context of market research (student research, student survey) unless there is Explicit Consent of the Data Subject.</p>

3	<b>What about minors?</b>	<p>On the basis of the GDPR, permission from the parents is required for minors younger than 16 years of age.</p> <p>There are a number of possible scenarios in which we deal with young people under the age of 16 in the context of marketing &amp; communication:</p> <ul style="list-style-type: none"> <li>• Within the framework of activities relating to the Children's University in which a child aged 10 to 13 is involved, we need the parent's consent (for example by means of a check-box that the parents are in agreement with the enrollment/participation).</li> <li>• Prospective students under the age of 16. It is possible that a prospective student is younger than 16 years of age. We do not ask about the age of prospective students because this is not a necessary item of data and there is relatively little chance that they are just under the age of 16. Nevertheless, we recommend that parents give their consent by means of a button (opt in).</li> </ul>
4	<b>Which data are not Personal Data?</b>	<p>Personal Data that have been anonymized are not Personal Data and do not fall under the GDPR. Anonymized data can no longer be traced back to a natural person (this can also no longer be recovered). Often there is no question of anonymizing, but of pseudonymizing. See the <b>Privacy &amp; Personal Data Protection Policy, Chapter 6.4</b> for an explanation of the difference.</p> <p>Personal Data of deceased persons are also not Personal Data. It goes without saying, however, that Tilburg University must be careful with this, for example, that communication with deceased persons must be prevented.</p>
5	<b>Are IP addresses Personal Data?</b>	<p>Yes, IP addresses are also Personal Data, which means that we must treat them in the same way as other data. The data we keep about website visits is, therefore, processed anonymously. As a result, we are a little less able to see where a visitor comes from.</p>
6	<b>How do I know I am doing the right thing?</b>	<p>Before you start Processing Personal Data (collecting, using, sharing, storing) you should guarantee that:</p> <ol style="list-style-type: none"> <li>1. you have a Processing Basis and a purpose for your processing;</li> <li>2. you collect as little Personal Data as possible but enough to get an correct picture of the Person for the purpose of the predetermined goal;</li> <li>3. the persons from whom you collect data are well informed (by Privacy Statement or Consent);</li> </ol>

		<ol style="list-style-type: none"> <li>4. you process the Personal Data securely and do not store it any longer than necessary. The storage period is determined at the start of the processing in accordance with the GDPR;</li> <li>5. the processing of Personal Data is recorded in the Data Processing Register; and</li> <li>6. a (Processing) Agreement is concluded with third parties.</li> </ol> <p>If you need help, please contact your <a href="#">Data Representative</a>.</p>
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## 2. Processing Personal Data

You may not Process (collect, use, share, and store) Personal Data as a matter of course. First, you must have a so-called Processing Basis and a Processing Purpose. For more information, please refer to the [Privacy & Personal Data Protection Policy, Chapter 4](#).

Marketing & Communication and DARO send various communications to the different stakeholders (prospective students, students, alumni, and corporate relations). The purpose of the information can be roughly divided into the following categories:

1. informing about changes in the University's policy;
2. informing about comparable products and services as a result of a previously purchased product or service;
3. informing about new products and services of the University;
4. informing about meetings of university partners;
5. attracting potential students;
6. approaching alumni for fundraising, maintaining relations, accreditation purposes, and the internationalization agenda; and
7. market research and evaluations.

7	<b>What is the basis for the processing?</b>	The Processing Basis <b>depends on the purpose of the communication:</b>	
		<b>Purpose of communication</b>	<b>Processing Basis</b>
		<b>Informing about changes in the university's policy</b>	<p><b>Necessary for execution of agreement:</b> If this information is necessary with regard to the study results of the student.</p> <p>Or</p> <p><b>Legitimate interest:</b> it is important that it is necessary: it must not be possible for Tilburg University to inform the Student properly in any other way (without processing Personal Data). Only information for which Tilburg University wants to be certain that the student, employee, or alumni receive it must be sent in this way.</p> <p><a href="#">Example: informing students about a change to the Education and Examination Regulations (EER).</a></p>
		<b>Informing about comparable products and services as a result of a previously purchased product or service</b>	<p><b>Legitimate Interest:</b> it is justified to inform the recipient about similar products and services. Again, it is important that it is necessary and that the information cannot be provided in a less intrusive manner.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object must also apply</b> here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p>

			<p>Example: a student has taken a language course at the Language Center and we would like to inform him about another language course.</p>
		<p><b>Informing about new products and services of the University that are RELATED to the CORE BUSINESS of the University (education and research)</b></p>	<p><b>Legitimate interest:</b> it is justified to inform the recipient about these new services if they are related to the study program. It is necessary, however, that information cannot be provided in another, less intrusive way.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object must also apply</b> here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p>Example: informing students about a new service like the scriptorium</p>
		<p><b>Informing about new products and services of the university that are NOT RELATED to the CORE BUSINESS of the University (education and research)</b></p>	<p><b>Consent:</b> only allowed if unambiguous consent has been obtained (opt-in).</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object must also apply</b> here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p>Example: approaching corporate relations for donations or sponsorship of events.</p>
		<p><b>Informing about meetings/products or services SUPPORTING THE UNIVERSITY'S PRIMARY</b></p>	<p><b>In connection to the study program</b> by partners affiliated to the university: <b>legitimate interest.</b> It is necessary, however, that information cannot be provided in another, less intrusive way.</p>



		<p><b>PROCES by partners of the University</b></p>	<p>On the basis of the Telecommunications Act, the <b>Right to Object must also apply</b> here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p>Example: Top Week Foundation in connection with the introduction week, study and student associations, mentoring, and book sales.</p> <p><b>Other: Consent</b> only allowed if unambiguous consent has been obtained (opt-in).</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object must also apply</b> here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p>Example: To bring commercial activities of partner institutions to the attention of recipients. This can only be done on the basis of Consent. An alternative is to pay attention to this in a newsletter, for example, inserting a link to access the partner's website.</p>
		<p><b>Attracting potential/prospective students</b></p>	<p><b>Consent:</b> for the first registration for an event: only allowed if unambiguous consent has been obtained (opt in).</p> <p>If the student has already received or requested such information, then there is a <b>legitimate interest</b>.</p>

			<p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p><a href="#">Example: provision of information in response to a request for information from the prospective student.</a></p>
		<p><b>Alumni for fundraising, maintaining relations, accreditation, and the internationalization agenda purposes</b></p>	<p>In connection to the study program by partners affiliated to the university: <b>legitimate interest</b><sup>1</sup>. It is necessary, however, that information cannot be provided in another, less intrusive way.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wants to receive this information, he must be removed from the mailing list.</p> <p><a href="#">Example: newsletter to alumni, invitation to an alumni event, and a phone campaign for fundraising.</a></p>
		<p><b>Use of STUDENT OR ALUMNI DATA for the purpose of Scientific research (internal disclosure)</b></p>	<p>The Processing Basis for scientific research is <b>Legitimate Interest</b> or <b>Consent</b> (see the <b>Thematic Policy on Scientific Research</b> for further information).</p> <p>Marketing &amp; Communication <b>only provides Personal Data</b> of Students, Alumni, or Employees for scientific research if there is a</p>

<sup>1</sup> The sector (alumni offices) has requested legal advice on the processing basis, which is coordinated with the Dutch Data Protection Authority. It is expected that the outcome of this will be Legitimate Interest. But should this not be the case, the basis will have to be adjusted.

			<p><b>Processing Basis</b> and will only provide the necessary Personal Data.</p>
		<p><b>MARKET RESEARCH National Student Survey (NSE)</b></p>	<p><b>Legitimate interest:</b> concerns market research using business e-mail addresses.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes to receive these requests, he must be removed from the mailing list so that he will no longer be approached for future research.</p>
		<p><b>MARKET RESEARCH National Alumni Survey (NAE)</b></p>	<p><b>Legitimate interest:</b> concerns market research of which the results are important for the evaluation of Tilburg University's core business.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes to receive these requests, he must be removed from the mailing list so that he will no longer be approached for future research.</p>
		<p><b>Research for the purpose of the RANKINGS</b></p>	<p><b>Legitimate interest:</b> Tilburg University's interest in having a good ranking is important as a quality indicator.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient no longer wishes to be approached for research for Rankings, he must be removed from the mailing list.</p>
		<p><b>MARKET RESEARCH/ SATISFACTION SURVEY</b></p>	<p><b>Legitimate interest:</b> concerns market research using business e-mail addresses.</p>

		<p><b>directed/coordinated centrally</b></p>	<p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient no longer wants to be approached for research, he must be removed from the mailing list.</p> <p><i>Example: Dutch <a href="#">Studiekeuze 123</a>, Organization Monitor</i></p>
		<p><b>Evaluations of events</b></p>	<p><b>Consent:</b> Data Subjects must give their consent on the application form.</p> <p><b>Please note</b> that this may also apply to minors. If this happens frequently, set up a tick box that includes consent from the parents or caregivers.</p>
		<p><b>Student satisfaction evaluations</b></p>	<p><b>Legitimate interest:</b> the purpose is improvement of education and services.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes to receive this information, he must be removed from the mailing list.</p>
		<p><b>Feasibility studies degree programs/tracks</b></p>	<p><b>Legitimate interest:</b> if the degree program in question is of direct interest to the student/prospective student.</p> <p><b>Consent:</b> if this is not the case.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes</p>

			to receive this information, he must be removed from the mailing list.
		<b>Research on study choice/ customer journey 1st-year students</b>	<p><b>Legitimate interest:</b> the purpose is improvement of education and services.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes to receive this information, he must be removed from the mailing list.</p>
		<b>Evaluation of information and events for prospective students</b>	<p><b>Legitimate interest:</b> the purpose is improvement of education and services.</p> <p><b>Please note</b> that this may also apply to minors. If this happens frequently, set up a tick box that includes consent from the parents or caregivers.</p>
		<b>Exit/dropouts research</b>	<p><b>Legitimate interest:</b> the purpose is improvement of education and the provision of information.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes to receive this information, he must be removed from the mailing list.</p>
		<b>Other market research—surveys</b>	<p><b>Consent:</b> the Data Subject must give his consent for this.</p> <p>On the basis of the Telecommunications Act, the <b>Right to Object</b> must also apply here. If the recipient indicates that he no longer wishes</p>

		to receive this information, he must be removed from the mailing list.
8	<b>For what do I need Consent?</b>	<p>This depends on the <b>purpose of the information</b> as described above. In general, if the aim is to transfer information, no consent is required, but in the case of advertising, consent is required.</p> <p>There is, of course, a grey area between providing information and advertising. If it concerns commercial activities, then, in most cases, it is advertising.</p> <p><b>Consent</b> must always be given unequivocally (opt-in) and the right to object applies.</p>
9	<b>What do I need to do in case of Consent?</b>	<p>If you process (collect, store, analyze, use...) data on the processing basis consent, the consent must be recorded.</p> <p>You record this consent in your database. In this file you must clearly state the privacy status of each contact, when it was obtained, in what way, and for what exactly the consent (if relevant) was given.</p> <p>And it must be as easy for the contacts/data subjects to withdraw their consent as it is to give it. Here, too, a process must be set up such as the unsubscribe button in a mailing.</p> <p>The new law also applies to your current address database. Have you obtained permission before May 2018 but do not yet comply with the law (e.g., you have not recorded consent anywhere)? In that case, you also have to ask your existing relations for consent again.</p>
10	<b>What does the right to object entail?</b>	<p>The right to object is the right of the Data Subject to indicate that he no longer wishes to receive such information/mailings. It should be possible to exercise the right to object in the same simple manner as giving consent or receiving the information, for example, by having a “unsubscribe” option at the bottom of a message, or by having a check mark at the bottom of a message that you no longer wish to receive information.</p>

		It is important that if a person exercises the right to object, Tilburg University also guarantees that he will no longer receive such information. This means that it must be processed in the central mail database.
11	<b>Which Personal Data am I allowed to process?</b>	<p>You are only allowed to collect data that is necessary for the purpose for which you are collecting it. Handy is not the same as necessary. If you collect Personal Data for children under the age of 16, special rules apply (see the question related to this). The same applies to Special Personal Data for which, in principle, a processing ban applies.</p> <p>Example: in an application form for an activity you are not allowed to ask for Special Personal Data. This is not relevant for the application of an activity.</p>
12	<b>What am I allowed to ask in a web form?</b>	<p>In a web form, you are only allowed to ask for information that is necessary for the purpose of that form.</p> <ul style="list-style-type: none"> <li>• What data are recorded?</li> <li>• For which period of time data are recorded? and</li> <li>• The purpose for which the data are recorded.</li> </ul>
13	<b>Whom am I allowed to e-mail?</b>	<p>In principle, you are allowed send e-mails to target groups if it is necessary: it should not be possible for Tilburg University to inform the data subject in another way, without processing personal data. This should be treated with caution: you are only allowed to use e-mails for information that you want to be sure is received personally.</p> <p>E.g.: students may be informed by means of a personal e-mail about changes to the examination rules. However, changes in the opening hours of the Sports Center are not necessary (this can also be done by means of information boards or, for example, a message on Blackboard).</p>
14	<b>Do separate rules apply for (e-mailing) alumni?</b>	In principle, the rules for alumni are the same. You need a processing basis, a purpose, and it must be necessary.
15	<b>Am I allowed to e-mail external relations (prospective students, career counsellors, alumni, corporate relations) from my own</b>	E-mailing corporate relations, alumni, students and prospective students from a private mailbox should be avoided as much as possible in large-scale communication.

	<p><b>mailbox? If so, how can anyone invoke GDPR provisions?</b></p>	<p>You run the risk that you do this on the basis of outdated contact data. But, in addition, processing the withdrawal of consent and the right to object that the recipients have is a lot more complex because the full processing is not guaranteed.</p> <p>Preferably, the following procedure should be followed.</p> <ul style="list-style-type: none"> <li>• Apply to M&amp;C (Salesforce) or DARO (alumni database) using the occasional disclosure form so that they can send out the communication and no Personal Data needs to be exchanged.</li> </ul> <p>If this is not possible (for example because responses from a mailing will need to be received), then request M&amp;C or DARO for an address database via the Internal Disclosures Form. Addresses are delivered via Secure FileSender including clear agreements on the storage period (they must be erased as soon as possible).</p>
16	<p><b>Is Social login (logging in with Facebook and Google) allowed?</b></p>	<p>Social login refers to the use of login data from social media (e.g., Facebook or Google) to gain access to applications/filling out web forms.</p> <p>This is often simpler (and faster) for the Data Subject, but also entails privacy risks: for example, that login data are misused (and passwords are known), but also that the organizations involved can monitor behavior.</p> <p>That is why Tilburg University uses the following principles for business applications:</p> <ul style="list-style-type: none"> <li>• Use link with Tilburg University e-mail address and password and NO social login.</li> <li>• If linking with Tilburg University e-mail address is not possible, then use a university e-mail address with ANOTHER password (application specific).</li> </ul>

### 3. Storage of Personal Data

A number of guidelines also apply to the storage of Personal Data:

- Storage period: no longer than necessary or required by law.
- Storage of Personal Data must be done securely.



17	<b>For how long am I allowed to store Personal Data?</b>	<p>The Personal Data may <b>not be stored longer than is necessary for the purposes of the processing, unless there is a legal ground</b> for doing so. The controller is responsible for this. For the Storage of contact data, further details will be included in an appendix.</p> <p>Separate storage periods apply to students: these are included in the <b>Thematic Policy for Education/Students</b>.</p>
18	<b>Where am I allowed to store Personal Data?</b>	<p>It is important that the Personal Data are stored in a <b>secure manner</b>, preferably on Tilburg University Servers in the central databases. If the storage takes place by a third party, a Processing Agreement must be concluded.</p> <p>This contributes to the Personal Data being up to date because employees no longer use old lists (e.g., with old e-mail addresses) or e-mailing to persons who have indicated that they no longer want to receive mail.</p> <p>If it is still necessary for Personal Data to be stored on a laptop, USB stick, or other data carrier, it must be encrypted. This is to prevent unauthorized access. If Personal Data is physically available (on paper), it should be stored in locked filing cabinets and only be accessible to those employees who need access.</p> <p><b>Please note</b> that storing on shared disks and on computers used at flex spaces also involves risks and it is therefore <b>not</b> allowed to store Personal Data files here.</p> <p>For more details, see the <b>Privacy &amp; Personal Data Protection Policy, Chapter 9</b>.</p>
19	<b>How should I manage and store contact information for surveys?</b>	<p>For all research, the addresses must be requested using the occasional disclosure form provided for this purpose. After sending out the invitations (and reminders), M&amp;C will erase the addresses again. Data files are stored without personal data or indirect traceability.</p>
20	<b>How should I manage and store survey results (e.g., internal, NSE, and NAE results)?</b>	<p>The data files regarding research and surveys often contain a large number of background variables so that the results can be traced back to persons, now or in the future.</p>

		<p>In a number of surveys, the question whether the ANR can be used for example, which most people agree with (consent). But also by aggregating variables (e.g. study program, age, or place of residence) it could make it traceable to persons. This is prevented by deleting results that can be traced back to 5 persons or fewer from the data.</p> <p>The following guidelines apply to this raw data containing Personal Data (with consent):</p> <ul style="list-style-type: none"> <li>• Access security: Access to this raw survey data should be limited to those for which it is strictly necessary (market researchers and supervisors). This must be safeguarded.</li> <li>• Secure storage: files should be stored in a secure location, preferably on Tilburg University servers.</li> <li>• For longitudinal studies, only untraceable research results shall be stored (i.e. background variables shall be removed as soon as the necessary analyses at an aggregated level have been completed).</li> <li>• The management information produced on the basis of these surveys must guarantee anonymity: in other words, it must not be traceable to individuals.</li> </ul>
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## 4. Sharing Personal Data

It happens regularly that internal or related parties ask for Personal Data to be shared. Think, for example, of a School that asks the Personal Data of alumni or prospective students to invite them for an activity, an affiliated institution requests this information (e.g., the Endowed Chair Foundation, Tilburg University Society, or Tilburg University Fund), or the Personal Data will be requested by an external party (Top Week Foundation, Avans University of Applied Sciences, etc.). This section answers a number of questions on this subject.

21	<p><b>Am I allowed to pass on the data I have collected INTERNALLY to a colleague or another organizational unit?</b></p>	<p>Yes, that is allowed, but it depends on the situation. Personal Data may be shared if this is compatible with the purpose for which the data was collected. Marketing and communication purposes may include information provision, market research, direct marketing, and registration for events. For alumni relations, this can also be fundraising, for example.</p>
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		<p>If the purpose for which the person wants to receive this Personal Data is the same as the purpose for which it was provided, then it is allowed. It is therefore important that the provider knows what the recipient intends to do with the Personal Data in order to determine whether this is permitted. An important starting point is that handy is not the same as necessary. Only the strictly necessary Personal Data are shared.</p> <p>Examples</p> <ul style="list-style-type: none"> <li>• A Department requests the contact details of prospective students for a particular Bachelor's program to inform them about an orientation lecture. This purpose is compatible.</li> <li>• A School asks for information about the sponsor contributions of their alumni as a kind of market information. This is sensitive information if it is provided on an individual alumnus basis. What could be done in this case is to aggregate the data by Department level or possibly even by level of education, as a result of which the data are anonymized.</li> </ul> <p>If the information is disclosed, the following points for attention apply:</p> <ul style="list-style-type: none"> <li>• Good practice is to send the mailing from a central mailing database instead of disclosing contact details. The Department delivers the content, but M&amp;C sends the communication.</li> <li>• Ensure that transfers are secure (see <b>Chapter 9 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Disclosure must be recorded in the Data Processing Register if it is a structural disclosure.</li> <li>• If it is a (one-only) occasional disclosure, a different procedure applies. An application must then be made using a specially developed form. The occasional disclosure does not have to be recorded in the Data Processing Register.</li> </ul>
22	<p><b>Am I allowed to pass on Personal Data to affiliated institutions such as, for example, the Tilburg University Fund Foundation, Top Week Foundation, etc.?</b></p>	<p>Yes, that is allowed, but it depends on the purpose of the institution in question. If this is strongly related to the purpose for which Tilburg University has collected the Personal Data (e.g., study program) then there is a legitimate</p>

		<p>interest in disclosing the contact details if the purpose of the collection by TiU is the same as the purpose for which the affiliated institution wishes to receive the Personal Data.</p> <p>This is the case, for example, with the Top Week Foundation: it is important to be able to inform students about the induction program, which is important for getting to know their fellow students and the university. The same applies to the Tilburg University Fund Foundation.</p> <p>However, this need not be the case for all affiliated institutions. Therefore, if in doubt, consult the Data Representative.</p> <ul style="list-style-type: none"> <li>• Inform the data subject in advance that you are disclosing the information to the relevant affiliated institution</li> <li>• The right to object applies.</li> <li>• Good practice is to send the mailing from a central mailing database instead of disclosing contact details. The affiliated foundation delivers the content, but M&amp;C sends the communication.</li> <li>• Ensure that transfers are secure (<b>see Chapter 9 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Make good contractual arrangements with the affiliated institution (this does not have to be a Processing Agreement in all cases). (<b>see Section 11.4 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Disclosure must be recorded in the Data Processing Register (<b>see Section 11.3 of the Privacy &amp; Personal Data Protection Policy</b>).</li> </ul>
23	<p><b>Am I allowed to pass on Personal Data to a STUDENT ASSOCIATION?</b></p>	<p>This is allowed only <b>once at the start of the study program</b>. There is then a legitimate interest in introducing students to what student associations have to offer.</p> <p>After this, student associations must retrieve the data from their own membership database. We refer to the recommendations/points mentioned in question 24.</p>
24	<p><b>Am I allowed to pass on Personal Data to a STUDY ASSOCIATION?</b></p>	<p>Yes this is in specific circumstances allowed. Personal Data may be shared if this is compatible with the purpose for which the data were collected, and there is a Purpose (mostly Legitimate Interest). This is the case for study associations if it concerns study-related activities. There is therefore also a</p>

		<p>legitimate interest in sharing contact details with these study associations. There are, however, a number of recommendations/points for attention:</p> <ul style="list-style-type: none"> <li>• Inform students in advance that you will disclose information to the study association.</li> <li>• The Right to Object applies for study associations.</li> <li>• Good practice: use the central mailing database instead of disclosing contact details. The association delivers the content, but M&amp;C sends the communication (only applicable to study association, for student association we refer to question 23)</li> <li>• Ensure that transfers are secure (see <b>Chapter 9 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Make good contractual arrangements with the study associations (this does not have to be a Processing Agreement). See <b>section 11.3 of the Privacy &amp; Personal Data Protection Policy</b>). If you use the standard form than it is not necessary to make separate arrangements.</li> <li>• Processing needs to be recorded in the Data Processing Register.</li> </ul> <p>In some cases, study associations carry out certain activities (e.g., publishing a magazine) for which processing by M&amp;C is too intensive. In this case, they would have to keep their own membership administration and they are responsible for this themselves.</p>
25	<p><b>Am I allowed to pass on contact details to authorities for the purpose of national market research such as the NSE, NAE, and <i>Studiekiezer 123</i>?</b></p>	<p>Yes, that is allowed. There is a legitimate interest after all, and the purpose is research in order to improve quality. The following points for attention apply in this respect:</p> <ul style="list-style-type: none"> <li>• Only necessary data</li> <li>• Contractual arrangements must be made: <ul style="list-style-type: none"> <li>○ in the form of a Processing Agreement if the external party works on the instruction of Tilburg University (Tilburg University is the controller and the external party is the processor),</li> </ul> </li> </ul>

		<ul style="list-style-type: none"> <li>○ in the form of another agreement if the external party is the controller.</li> </ul> <p>For more information see the <b>Privacy &amp; Personal Data Protection Policy, Section 11.4.</b></p> <ul style="list-style-type: none"> <li>• Providing data must be done securely (see Chapter 9 of the <b>Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Processing must be recorded in the Data Processing Register</li> </ul>
26	<b>Am I allowed to pass on contact information to an EXTERNAL party for the purpose of occasional market research?</b>	<p>Yes, that is allowed, <b>provided that there is a processing basis and a purpose for processing that corresponds to the purpose for which the information was collected.</b> See the answer to question 8 for more information. The following points for attention apply in this respect:</p> <ul style="list-style-type: none"> <li>• Disclose only necessary data to the external party</li> <li>• Disclosing data must be done securely (see <b>Chapter 9 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Contractual arrangements must be made: <ul style="list-style-type: none"> <li>○ in the form of a <b>Processing Agreement</b> if the external party works on the instruction of Tilburg University (Tilburg University is the controller and the external party is the processor),</li> <li>○ in the form of another agreement if the external party is the controller.</li> </ul> </li> </ul> <p>For more information see the <b>Privacy &amp; Personal Data Protection Policy, Chapter 11.4.</b></p>
27	<b>Am I allowed to pass on Personal Data to an EXTERNAL party for the purpose of the RANKINGS (like QS, Times Higher Education, and Financial Times)?</b>	<p>Yes, that is allowed, provided that the <b>Data Subject</b> gives <b>Consent</b> for passing on his contact information to an external party.</p> <ul style="list-style-type: none"> <li>• Consent for passing on Personal Data is necessary.</li> <li>• Disclose only necessary data to the external party</li> <li>• Disclosing data must be done securely (see <b>Chapter 9 of the Privacy &amp; Personal Data Protection Policy</b>).</li> <li>• Contractual arrangements must be made: <ul style="list-style-type: none"> <li>○ in the form of a <b>Processing Agreement</b> if the external party works on the instruction of Tilburg University (Tilburg</li> </ul> </li> </ul>

		<p>University is the controller and the external party is the processor),</p> <ul style="list-style-type: none"> <li>○ in the form of another agreement if the external party is the controller.</li> <li>• For more information see the <b>Privacy &amp; Personal Data Protection Policy, Section 11.4).</b></li> </ul>
28	<b>Am I allowed to pass on Personal Data of Alumni (e.g., diploma verification) to an EXTERNAL party (e.g. employer)?</b>	It is <b>subject to the Alumnus' consent</b> to disclose the information to the party concerned. This information is never provided by DARO; the external party is always referred to the Student Administration. For more information, see the <b>Thematic Policy Education/Students.</b>
29	<b>Does the registered office of the controller or the location of the data processing operation determine whether it entails a country outside the EU?</b>	The GDPR applies the moment that Tilburg University processes Personal Data. If we disclose Personal Data to countries outside the EU, stricter requirements apply with regard to lawfulness. See the <b>Privacy &amp; Personal Data Protection Policy, section 4.5.</b>
30	<b>Is storing Personal data in an application, processing?</b>  <b>What is a processor; what is a processing agreement; how do I know whether this is agreed?</b>	<p>If Personal Data are stored in an application, Processing indeed takes place.</p> <p>If this application is hosted (managed) by an external party (e.g., on a server or in the cloud), a Processing Agreement must be drawn up for this purpose because, in this case, Tilburg University is the Controller (Tilburg University determines the purpose and means) and the external party is the Processor (they carry out the Processing).</p> <p>This must be stated in the Data Processing Register, and the Processing Agreement must be stored centrally. (<b>See Privacy &amp; Personal Data Protection Policy, Chapter 11</b>)</p>
31	<b>Am I allowed to e-mail or must I always use Secure FileSender?</b>	<p>It is obviously important that sending (files with) personal data is done in a secure manner. This concerns both sending data within Tilburg University as to processors or third parties.</p> <ul style="list-style-type: none"> <li>• When transferring data, you must take additional measures such as sending data via <b>Secure FileSender</b> or by means of encryption. You can find information about this on the intranet.</li> </ul>
32	<b>I would like to send an e-mail to a large group of external persons. What should I consider?</b>	When sending an e-mail to a large group of external persons, the following points for attention apply:

		<ul style="list-style-type: none"> <li>• Preferably send the e-mail from the central contact files (mailplus) so that you can be sure that you have the correct e-mail addresses. Make a request to Marketing &amp; Communication or DARO by means of the <b>Internal Disclosures Form</b>.</li> </ul> <p>If this is not possible (e.g., because a response is requested), request contact details at DARO or Marketing &amp; Communication by means of the Internal Disclosures Form. They provide contact details by means of Secure FileSender.</p> <ul style="list-style-type: none"> <li>• Send the e-mail by sending the mailing list in the BCC to prevent other people from seeing the mailing addresses.</li> <li>• Erase the contact list immediately after sending.</li> </ul>
<b>33</b>	<p><b>What to do with data that arrive via e-mail in a Tilburg University mailbox and the data from those e-mails (e.g., contact information) are processed in a database?</b></p> <p><b>What should happen to the e-mail? Do you have to keep it in the mailbox so that (if the alumnus asks us to do so) we have proof of where we have his contact information from?</b></p>	<p>This type of e-mail must also be stored as much as possible and as quickly as possible on a platform such as SharePoint or encrypted on a network drive. Outlook is not a suitable archive system.</p>

## 5. Data Processing Register

Every structural processing of personal data carried out by Tilburg University (i.e., both processing for which the university is responsible (or co-responsible) and processing for which the university is the processor) must be recorded in a Data Processing Register. If changes occur in a certain process with regard to the Processing of Personal Data, these must be mutated in the Data Processing Register. Examples include the adaptation of the processing purposes, the adaptation of the categories of personal data, the involvement of a processor, or the adaptation of the storage period.

<b>34</b>	<p><b>When must a processing be included in this Register?</b></p>	<p>If Personal Data are processed in a process or project, the Data Processing Register must be completed by the owner of the process or</p>
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		<p>project. In principle, all structural processing operations should be included in the Register.</p> <p>This applies not only to systems such as Salesforce, MWM2, or Raisers Edge, but to Excel and Word documents in which Personal Data is included as well.</p> <p>In the case of structural processing of personal data, it is not recommended to use MS Office tools.</p>
35	<b>Does this only apply to structural processing or to one-only/occasional processing as well?</b>	<p>Inclusion in the Data Processing Register is only <b>mandatory for structural processing</b>.</p> <p>A different procedure applies to occasional processing. In that case, an application must be made using the <b>Internal Disclosures Form</b>.</p>
36	<b>How/via whom are new processing operations registered?</b>	<p>The process manager (system owner) is responsible for registering and updating the Data Processing Register. See the <b>Data Processing Register procedure</b> and <b>section 11.3 of the Privacy &amp; Data Protection Policy</b>.</p>
37	<b>Is the Register accessible to everyone?</b>	<p>In principle, this is not necessary. So-called privacy statements are drawn up for the various categories of data subjects and published on the website regarding which personal data we process and for what purpose.</p>
38	<b>How is the processing basis defined/substantiated in the Register?</b>	<p>A number of fields have been defined in the processing register so you can select one of the options. You must indicate these per processing operation. This applies, for example, to the processing basis, the purpose of processing, and the process.</p>