

## PERSONAL DATA PUBLICATION GUIDELINES

**Date:** December 22, 2021

### **Decisions and changes (ownership)**

Taking into account advice from the Privacy Officer, the Directors will decide on changes on these guidelines. Requests for changes or addenda must be submitted to the M&C Data Representative (personal data publication process officer), who may submit the request for change to the Managing Directors of the Divisions.

### **Please note**

- The lawfulness and justification must always be purpose-specific. Consequently, publication of personal data always requires verification of the legitimacy of publication.
- Consent given to publish personal data for a specific purpose does not imply consent to publish the same data somewhere else.
- Processing operations must always be logged in the processing register of the university.
- When staff enter their own personal data for a specific purpose themselves, consent for that purpose is implied.
- If the lawfulness of processing rests on different bases, a distinction is made between academic and non-academic staff. Where no such distinction is made, the term “staff” is used.
- A precondition for publishing contact details is that these data are published in a way that does not facilitate “scraping” (i.e., automated mining by third parties for spamming purposes).
- If the target group is set to “public”, the information will become publicly available; if the target group is set to “internal”, information will become available to all staff and students, and in some cases only to all staff. Information available to certain staff only qualifies as authorized use. This use is beyond the scope of these guidelines.

Personal data	Of (role)	Publication / target group	Lawfulness of processing	Necessity/Justification	Retention period	Particulars	
<b>Profile page</b>	Academic staff	Public	Legal obligation	Sectoral external activities regulations, collective labor agreement, and policy and public function of university	Until employment end date		
		Internal	Legitimate interest	Searching for colleagues or contacts		Irrelevant, because data are public	
	Non-academic staff	Public	Consent				
		Internal	Legitimate interest	Searching for colleagues or contacts		Staff only	
	Student	Public	Consent			Career portal	
		Internal	Consent			(as yet NA)	
<b>Name</b>	Academic staff	Public	Legal obligation	Sectoral external activities regulations, collective labor agreement, and policy and public function of university	Until employment end date		
		Internal	Legitimate interest	Searching for colleagues or lecturers	Until employment end date	Irrelevant, because data are public	
	Non-academic staff	Public	Consent		Until employment end date or on withdrawal of consent	Exception for several positions that have a justified interest, such as Press Officer, EB, Data Protection Officer, Privacy Officer	
		Internal	Legitimate interest	Searching for colleagues or lecturers	Until employment end date	For reasons of process organization, contact details must be replaceable with the contact details of a desk or office as and when necessary.	
	Student	Public	Consent			(as yet NA)	
		Internal	Legitimate interest	Searching for contact details for educational activities	Until completion of studies	LDAP to contain name and email address only	
	<b>External activities</b>	Academic staff	Public	Legal obligation	Sectoral external activities regulations, collective labor agreement, and policy and public function of university	Until employment end date	
			Internal	-			Irrelevant, because data are public
Non-academic staff		Public	Consent		Until employment end date or on withdrawal of consent	Exception for several positions that have a justified interest: EB	
		Internal	Consent		Until employment end date or on withdrawal of consent		
Student		Public	NA				
		Internal	NA				
<b>Office contact details:</b>		Staff member	Public	Consent		Until employment end date or on withdrawal of consent	Exception for several positions that have a justified interest, such as Press Officer, Data Protection Officer,

Personal data	Of (role)	Publication / target group	Lawfulness of processing	Necessity/Justification	Retention period	Particulars
Office email address Office telephone number In case of no reply Mobile office telephone number						Privacy Officer. Contact details need not be private ones; corporate email address suffices.
		Internal	Legitimate interest	Searching for colleagues or lecturers	Until employment end date	For reasons of process organization, contact details must be replaceable with the contact details of a desk or office as and when necessary.
	Student	Public	Consent			(as yet NA)
		Internal	Legitimate interest	Searching for contact details for educational activities	Until employment end date	LDAP to contain name and email address only
<b>Employment or registration data</b> Current affiliations: Position, department, School/Division, posting, degree program	Academic staff	Public	Legitimate interest	Policy and public function of university	Until employment end date	
		Internal	Legitimate interest	Searching for colleagues or lecturers		Irrelevant, because data are public
	Non-academic staff	Public	Consent		Until employment end date or on withdrawal of consent	
		Internal	Legitimate interest	Searching for colleagues or lecturers	Until employment end date	
	Student	Public	Consent			
		Internal	Legitimate interest	Searching for contact details for educational activities	Until employment end date	LDAP: number of visible data contingent on authorization
<b>Portrait or passport photo</b>	Staff member	Public	Consent		No longer than is necessary for the purposes for which the personal data are processed or on withdrawal of consent	Uploading a photo implies consent. For publication of photos consent must be explicitly requested.
		Internal	Consent		Until employment end date or withdrawal of consent	
	Student	Public	Consent		Until completion of studies or on withdrawal of consent	Consequences for managing photos made for recruitments purposes.
		Internal	Consent		Until completion of studies or on withdrawal of consent	
<b>Video</b>	Academic staff	Public	Consent		No longer than is necessary for the purposes for which the personal data are processed or on withdrawal of consent	For example, recordings of the <i>Tafel van Martinus</i> talk show. For some functions relating to public events there may be a legitimate interest. This might be the case when

Personal data	Of (role)	Publication / target group	Lawfulness of processing	Necessity/Justification	Retention period	Particulars
		Internal	Legitimate interest	Educational purposes		the recording is related to function output.
		Public	Consent		No longer than is necessary for the purposes for which the personal data are processed or on withdrawal of consent	For some functions relating to public events there may be a legitimate interest. This might be the case when the recording is related to function output.
	Non-academic staff	Internal	Consent		Until employment end date or on withdrawal of consent	Legitimate interest for educational activities.
		Public	Consent		Until completion of studies or on withdrawal of consent	Consequences for managing videos made for recruitment purposes.
	Student	Internal	Consent		Until completion of studies or on withdrawal of consent	
		Public	Consent			
<b>Location</b> E.g., in/out of office, room number, calendar	Staff member	Internal	Legitimate interest	For contacting and making appointments		Several authorization profiles can be set in the calendar.
		Public	Consent			(as yet NA)
	Student	Internal	Consent			(as yet NA)
		Public	Consent			
<b>Personal data</b> E.g., private telephone number, date of birth, work anniversaries	Staff member	Internal	Consent			Staff only
		Public	Consent			
	Student	Internal	Consent			
		Public	Consent			
<b>Links to other profile pages</b>	Academic staff	Internal	Legitimate interest for corporate profiles, consent for private profiles (LinkedIn, Facebook)	Legitimate interest: searching for colleagues or lecturers		
		Public	Legitimate interest for corporate profiles, consent for private profiles (LinkedIn, Facebook)	Legitimate interest: policy and public function of university		"Corporate profile" includes research profile page in Research portal or profile page on the Internet
	Non-academic staff	Internal	Consent			
		Public	Consent			
	Student	Internal	Consent			
		Public	Consent			
<b>Position output</b> Courses, publications, projects, PhD	Academic staff	Internal	Legitimate interest	Searching for colleagues or lecturers		Irrelevant, because data are public
		Public	Legitimate interest	Policy and public function of university	Until employment end date	In some cases the employment contract constitutes lawfulness of processing

Personal data	Of (role)	Publication / target group	Lawfulness of processing	Necessity/Justification	Retention period	Particulars
supervision, Fingerprint (Pure), collaborations, job-related video	Non-academic staff	Public	Consent		Until employment end date or on withdrawal of consent	Exception for several positions that have a justified interest, such as skills teachers
		Internal	Consent		Until employment end date	
	Student	Public	Consent			Graduation thesis
		Internal	Consent			
Career Résumé, qualifications, areas of research interests	Staff member	Public	Consent		Until employment end date or on withdrawal of consent	
		Internal	Consent		Until employment end date or on withdrawal of consent	
	Student	Public	Consent			Job teaser
		Internal	Consent			