

H.S.A. Confluente Privacy Statement

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1. Honors Study Association Confluente

You are currently reading the privacy statement of Honors Study Association Confluente (hereinafter referred to as: H.S.A. Confluente). H.S.A. Confluente is an Honors association which aims at creating and maintaining a community for Honors students at the University of Technology, Eindhoven. In doing this, the association organises multiple activities for its members.

To be able to do this, H.S.A. Confluente collects data of its members. Therefore, it is important for you to know what your data is being used for, what rights you have and how you can clarify your wishes with regard to this data to H.S.A. Confluente.

H.S.A. Confluente is Controller as described in the General Data Protection Regulation (GDPR), for the processes that are mentioned in this Privacy Statement. This means that H.S.A. Confluente is responsible for a careful and proper processing of your personal data. If you are not in agreement with how H.S.A. Confluente utilises your data, do not hesitate to contact us!

2. Purpose of Data Collection

H.S.A. Confluente collects data for the following purposes.

2.1 Member administration

H.S.A. Confluente communicates essential information, such as changes made to this document and invitations to general member meetings, via email. To be able to do this, H.S.A. Confluente must have your email address. In addition, your email address will be used for promoting events by means of a newsletter. You can always unsubscribe from this newsletter via the link in the newsletter itself.

Only the current board has access to the member administration. However, both the current board and the web committee have access to the website's database, which is what the member administration is largely based on.

2.1.1 Regular and associate members

The member administration contains the following information on regular and associate members. This data is stored for the purpose of communication, consent or administrative reasons. All data is collected either on a base of consent, or on a base of legitimate interest.

- First name
- Last name
- University email-address
- Non-university email-address

- Consent to the association newsletter
- Consent to pictures being taken of you and posted on our social media platforms
- Membership status
- Honors generation

The following data is stored as well, but is optional to provide to H.S.A. Confluent when creating an account on the website and is collected on a base of consent. It can therefore be requested to be destroyed at any time without major consequences.

- Date of Birth
- Consent to add your birthday to the association's calendar and newsletter
- Major
- Honors Track
- Phone number

All data is stored as long as the member is a regular or associate member. Once this is no longer the case, because the member becomes an alumni or stops being a member, all superfluous data will be destroyed within 1 year. The data stored on alumni is presented in the next section.

2.1.2 Alumni

The member administration contains the following information on alumni. This data is stored for the purpose of communication, consent or administrative reasons. All data is collected either on a base of consent or a base of legitimate interest.

- First name
- Last name
- Non-university email-address
- Honors generation
- Membership status
- Consent to the association newsletter

This data is stored up to 7 years unless requested otherwise by the member in question.

2.2 Website

To be able to log in on the website, you must have created an account on the website via the registration link. To be able to have an account on the website, you must have provided a password in the sign-up form. Passwords on our website are stored encrypted only on the website and are not accessible by anyone.

Next to the password, the website stores all information stored by the member administration, as the account is the source of information for the member administration. Therefore, data is stored here for the same purpose and on the same basis as the member administration. The data can only be accessed by the current board and the web committee. All corresponding and superfluous data will be destroyed within 1 year of loss of a membership type.

2.3 Financial administration

H.S.A. Confluente is obliged by law to keep all financial records for up to 7 years. Personal details are included in these financial records if you have either participated in events of the association for which you had to pay a participation fee or have organised events for which you have made costs on behalf of the association and received a reimbursement. All financial data is either stored physically in a locked cabinet, or online on the association's Onedrive, where only the board and the Financial Committee have access. Information that is saved includes:

- IBAN (bank account number)
- Name
- Description of expense
- Date of transaction
- Signature (for reimbursements or contracts)
- Any invoices or receipts added to declarations (might include information in the pdf)

All data is destroyed within 1 year after the passing of the legal term of 7 years, given that no actions such as paying outstanding debts still need to be taken on the record. Should this be the case, the data is stored longer, and destroyed within 1 year of the occurrence of these actions.

2.4 Activities

H.S.A. Confluente organises all kinds of activities. H.S.A. Confluente can use your phone number to contact you regarding activities. Your phone number is also used for quick communication within H.S.A. Confluente. In case you do not want H.S.A. Confluente to use your phone number, you can choose to not provide this information when signing up or request to delete the data. All information regarding activities will then be shared with you over email. Your email address is stored on the base of legitimate interest, and are stored within the member administration.

Many activities will request dietary preferences and allergies from participants, to ensure the meals provided are suitable for the participants. The basis of collecting this special category of data is explicit consent. This data will be stored on the website and within the association's Onedrive and will be destroyed within 1 year of the corresponding activity.

The names of the people subscribed to the activity are accessible to everyone with an account on the website. For several activities, additional data may be required and asked of you. We will ask as little data as required for the organisation of the activity. Only the organisers of the activity and the board will have access to your data. Should you disagree or not consent to any of this data asked, please contact us, such that we can find a solution to resolve the issue together. This data is stored for up to 2 years, unless otherwise requested by the member in question.

2.4.1 GMMs

During each GMM, several pieces of data are collected on the base of legal obligation or legitimate interest. Firstly, on the attendance sheet, both the names and member type are collected of each attending member. Additionally, names are collected on the additional matters sheet. Both of these are only stored physically, within the administration cabinet. After the GMM, the information in these documents will be copied into the minutes of the GMM. The Physical documents will be destroyed within 6 months time after the approval of the minutes of the corresponding GMM.

Finally, recordings are made during the GMM for the purpose of minute-taking. These are only stored locally on the devices of board members and this data is stored on the base of consent. This data will be removed within 6 months time after the approval of the minutes of the corresponding GMM.

2.4.2 Study trip

For entering the study trip, all participants are required to sign a contract, stating their name and holding their signature. These contracts are stored on the base of legal obligation. They will only be stored within the administration cabinet and will be destroyed within two years after the occurrence of the corresponding study trip.

Alongside this, during the study trip, contact will be made with, amongst others, companies, universities and museums. A list of names of participants may be shared in these instances. When sharing this information, we will require the corresponding instances to delete this data after 1 year of our visit.

2.4.3 Photos

Photos will be taken during activities, on the base of legitimate interest. During your registration, you can decide not to give permission to H.S.A. Confluent to publish and store photos of you. H.S.A. Confluent will then try to delete photos that were accidentally taken of you, within 6 months. In the case that your photos did get published without your permission, you can contact us and then we will remove your photos immediately. Any photos taken during an event will be destroyed within 7 years after the occurrence of the corresponding event.

Before entering some events, participants are asked whether they consent to having pictures taken of them, through a photo consent form. Participants are asked to put a signature alongside their name to give consent. These forms are stored within the administration cabinet. All forms will be destroyed within 6 months time after the occurrence of the corresponding event.

2.5 Committee and Board documents

All documents created by a committee or the board, such as meeting minutes, notes, and event reviews are stored on the corresponding Onedrive. These are of invaluable importance to the current committees and board, to recollect on previous decisions and ideas, as well as future committees, to gain ideas and understanding. The data is stored on the basis of legitimate interest. All data is stored for up to 7 years, after which it will be fully anonymized.

2.6 Communication

It may be required to store information received through one of the many communication channels of H.S.A. Confluente. Any communication received through Microsoft Outlook will be kept at most 7 years on the basis of legitimate interest, provided the matter of the email has been handled and the email is not required to be kept anymore. If the matter is not handled after 7 years, the email will be kept until at most one year after the email has been handled. Any other personal information which is received will be deleted within a year of the data not being required to be kept anymore.

2.7 Company information

At times, due to company visits, lunch lectures, or other company related events, it may be required to share your name and email address with a company. If any other data must be shared towards a company, you will be made aware of this clearly, or will be asked for explicit consent. The basis for this data sharing is the basis of a legal contract or legitimate interest. In each case, the company will be required by us to destroy your data within 1 year after the corresponding event.

2.8 Other

There may arise other cases where data will be asked from you or shared to third parties, for whatever purpose and basis applies in this case. In any case, we will adhere to the GDPR legislation with regards to the data asked.

3. Data Storage and Processors

3.1 H.S.A. Confluente

H.S.A. Confluente has access to both physical and digital documents with sensitive data. Most physical documents will be stored within the administration cabinet within the Honors Room, which is locked, and only the board has access to.

H.S.A. Confluente has the right to disclose data when:

- This is required by law, or
- H.S.A. Confluente considers it justified to serve a legal request or process, or
- To protect the rights, properties, and safety of H.S.A. Confluente.

H.S.A. Confluente has data processing agreements with the following companies. This means your data will also be processed by these companies.

3.2 Microsoft Outlook

To be able to send and receive emails, we have a data processing agreement with Microsoft who comply with the EU Standard Contractual Clauses. If you send an email to an address that ends with @hsaconfluente.nl, this means your email will be processed by Microsoft.

3.3 Microsoft Sharepoint

Microsoft Sharepoint is the general storage space of the association. Any digital data, of which it is not explicitly stated it will be stored elsewhere, will be stored here. In general, committees as well as the board will use this environment for storing minutes, agreements and any other documentation. The member administration is stored here as well. If you are not in agreement with your data being shared with Microsoft Sharepoint, this will be stopped, though this will result in you losing direct access to most documentation important to the association. Should you still want to view certain documents, please contact us, as we can provide you with documents through other channels.

3.4 Digital Ocean

Digital Ocean is used for hosting the website and the corresponding databases. This implies that all data provided when creating an account on the website, or any other action taken within the website, will be stored within databases owned by Digital Ocean. Digital Ocean hosts our data on servers within the European Economic Area ("EEA") and shows adherence to GDPR, which ensures proper safety and security of your data. International data transfer will only occur in accordance with the EU-U.S. Data Privacy Framework or the Standard Contractual Clauses. If requested, the processing of your data by Digital Ocean can be stopped though this can have consequences for your use of the website.

3.5 MailerLite

For automatically sending emails such as the weekly newsletter or GMM invitations, MailerLite is used. Mailerlite adheres the Standard Contractual Clauses. When you are registered as a member of H.S.A. Confluent your first name, last name and email address will be communicated to MailerLite. All data is stored on servers within the EEA. If you have an objection to this, get in contact with us. We can stop the processing of your personal data at MailerLite. This does imply that you may not receive certain emails.

3.6 Gekko Accounting

For keeping track of financial records, we use Gekko Accounting. This software does not contain any information outside of what is needed for financial administration purposes. Only the board and the Financial Committee have access to any data stored within this accounting software. If you do not wish your personal data to be processed within Gekko, please contact us. We will then try to find a different method to administer your financial data together.

3.7 Outlook calendar

Within the Outlook calendar, the birthdays of members are stored, which can be viewed by any other member. When signing up to the association, you are explicitly asked for consent for this. Not giving consent will not have any implications on your membership of H.S.A. Confluent.

3.8 External companies

When data is shared with external companies, it may be unknown in what way your data will be stored. To ensure the safety of your data, we will look at the privacy statement of any company we share data with.

H.S.A. Confluent endeavours to process your data only within the European Economic Area ("EEA") by storing your data on a server in the EEA wherever possible. Sometimes this is not possible, for example when we transfer data to an instance outside the EEA for which you have given permission. In this occurrence, we take the necessary measures to provide an adequate level of protection for your personal data. Should this not be satisfactory, we will demand a storage space secure enough, as demanded by GDPR legislation. H.S.A. Confluent makes sure the companies adhere to the EU Standard Contractual Clauses or similar model clauses to ensure that the international data transfer adheres to the GDPR.

4. Your rights

As a member of H.S.A. Confluent, you have the following rights, as described in GDPR articles 15 - 23. Conditions apply as described in these articles. To exercise your rights, please contact us via the contact information at the foot of this Privacy Statement. Note, however, that we may ask for additional information to verify your identity when exercising these rights.

If you have given consent to process your personal data for a certain purpose, you may always withdraw this consent. Note however that withdrawal of your consent is not retroactive. You can contact us about this via the contact information at the end of this Privacy Statement.

4.1 Right to inspect

At all times, you have the right to ask for all your personal information stored by H.S.A. Confluent. To use this right, you can contact H.S.A. Confluent. You will then get an extract of your data at H.S.A. Confluent.

4.2 Right to rectify

In case your information incorrect, incomplete, or has been changed, you have the right to get it rectified by H.S.A. Confluent. Furthermore, you have the right to change your email address on the website. Any data provided to third parties will be requested to be rectified.

4.3 Right to delete data

In case you do not want H.S.A. Confluent to keep your data anymore, then you can use the right to delete your data, as long as there is no legal basis such as outstanding debts at H.S.A. Confluent. Data that is called optional in section 2, can be removed at any time on your request. Any data provided to third parties will be requested to be destroyed.

4.4 Right to stop data processing

In case you do not want H.S.A. Confluente to use your data anymore, then you have the right to revoke your permission that allows H.S.A. Confluente to process your data, given the conditions as stated in [GDPR article 18](#). This does not cause data processing that occurred before your repeal to be unlawful. Usage of this right on non-optional personal data may have serious implications on your membership of H.S.A. Confluente. Naturally, we cannot stop using your data if it is required by law, or if there are still outstanding debts. Any data provided to third parties will be requested to be destroyed.

4.5 Right to transfer

In case you need your data that H.S.A. Confluente has, for use by another party or service, then you can use your right to transfer. If you want to use this right, contact H.S.A. Confluente. We will then, where technically and administratively feasible, transfer your data to you or the other party.

4.6 Right to object

You can object to any processing of your personal data on the base of public interest or legitimate interest. Unless legitimate, compelling grounds for processing exist, H.S.A. Confluente will no longer process your personal data.

4.7 Right to file a complaint

You have the right to file a complaint at the Autoriteit Persoonsgegevens, if you believe H.S.A. Confluente is not adhering to privacy legislation. You can do so by visiting [this](#) link.

5 Contact

If you have any questions regarding the processing of your data, please contact us through the contact information below. We will be happy to assist you.

If you believe that the processing of your personal data is not in line with the GDPR, for example, if you believe we are not processing your personal data with due care, or if your request for access or rectification has not been answered in time, you may lodge a complaint with the Advisory Board (hereafter: AB) via advisoryboard@hsaconfluent.nl. The AB serves as the link between the board and the [Dutch Data Protection Authority](#). The AB acts independently and can discuss your complaint or ask for advice from the Data Protection Authority.

If you do not agree with the handling of your complaint by the AB, you may lodge a complaint directly to the Data Protection Authority. The Data Protection Authority will handle the complaint or the request and decide upon it.

privacy@hsaconfluent.nl

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