



## Privacy Statement Students

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**Stichting Hogeschool Leiden**  
Zernikedreef 11  
2333 CK Leiden  
071-5188 900  
Kvk: 41167218

## Privacy Statement Students

Leiden University of Applied Sciences (HSL) respects the privacy of its students and treats its students' personal data with care and confidentiality. In doing so, the HSL complies with the requirements of the General Data Protection Regulation (GDPR) and related legislation.

This Privacy Statement explains which personal data Leiden University of Applied Sciences processes and why. You can also read about your rights and with which other parties the HSL may share your data.

Leiden University of Applied Sciences is responsible for processing the personal data of its students. Students of Leiden University of Applied Sciences include:

Students  
Course participants  
Prospective students  
Alumni

The Data Protection Officer (DPO) of Leiden University of Applied Sciences has been notified to the Data Protection Authority (DPA). The DPO ensures that the processing of personal data by Leiden University of Applied Sciences complies with the requirements of the law. The DPO can be contacted via the email address: [dorpel.vd.e@hsleiden.nl](mailto:dorpel.vd.e@hsleiden.nl)

### The links below help you to navigate quickly through the various topics

Categories of personal data .....	3
Purpose of processing .....	3
Retention periods.....	4
Legal bases .....	4
Provision of personal data to other companies and organisations .....	4
Security of personal data.....	4
Your rights .....	5
Procedure for reporting possible data breaches.....	5
Amendments to the Privacy Statement .....	6
Questions, comments or complaints .....	6

## Categories of personal data

The following categories of personal data may be processed by Leiden University of Applied Sciences:

- Identification data (e.g. name and address particulars, date and place of birth, student number, user name);
- Contact details and e-data (e.g. email address, telephone number, logging, IP addresses);
- Health data; (e.g. physical and psychological data in the context of study counselling)
- Copy of proof of identification and Citizen Service Number;
- Nationality;
- Financial data (e.g. bank account number);
- Personal characteristics (e.g. gender);
- Education and training (e.g. grades, diplomas, study progress);
- Profession and occupation (e.g. CV, work placement company or employer);
- Assessment data (e.g. personal feedback, reports);
- Image and sound recordings (e.g. photo, video).

## Purpose of processing

Leiden University of Applied Sciences may only process your personal data if there is a demonstrable purpose for doing so and if the processing is lawful. Processing is lawful if it meets the conditions set out in the law.

We use your personal data in particular for the following purposes:

- the smooth running of the choice of study orientation and your education enrolment;
- good organisation and proceedings of the education and interim examinations;
- monitoring, measuring and coaching of study progress;
- handling of complaints, objections and appeals;
- provision of effective study career coaching;
- assessment and execution of requests for special provisions for students with a (physical) disability;
- the prevention and investigation of suspicions of plagiarism and fraud and for taking (legal) measures in case of detected abuses;
- recommendation for a membership, award or nomination;
- evaluation of the quality and accessibility of education and the organisation of the HSL;
- performance of research by (other organisations than) Leiden University of Applied Sciences, such as, but not limited to HBO monitor, 100-days research, National Students' Survey and study results;
- protection of company assets, (personal) data and intellectual property rights of the HSL;
- managing availability, improving, testing, expanding and securing capacity of ICT facilities;
- Security of ICT facilities, including prevention of unauthorised use (as referred to in the Regulations Use of ICT facilities and (personal) data by employees of Leiden University of Applied Sciences);
- Reporting domestic violence and sex offences.

### **Retention periods**

Personal data will not be kept any longer than necessary for the relevant purpose. Retention periods may be regulated by law. In this case, the statutory retention periods are followed. If no statutory retention period applies, the Selections List for Universities of Applied Sciences will serve as a guideline for determining the retention periods. Where the Selections List for Universities of Applied Sciences does not provide a definite answer, considered and appropriate choices will be made.

### **Legal bases**

The main basis for the processing of your personal data by Leiden University of Applied Sciences is formed by the legal obligations concerning the processing of your personal data (such as taking examinations, issuing certificates and the issuing of study recommendations) and general interest (such as the interest of quality assurance of the education). In a limited number of processing operations, the HSL also uses the bases of: execution of the agreement, legitimate interest, consent and vital interest. If personal data is processed on the basis of consent, you have the right to withdraw your consent at any time. You can withdraw your consent by contacting us via the email address: [loket.privacy@hsleiden.nl](mailto:loket.privacy@hsleiden.nl).

### **Provision of personal data to other companies and organisations**

Leiden University of Applied Sciences may make use of (ICT) service providers for the processing of personal data. We conclude contracts with those service providers which specify exactly which data are shared under which conditions. Leiden University of Applied Sciences requires that the data provided will only be used for the specified purpose, that the data will be protected and that it will be destroyed after use.

In some cases, it is also possible for the HSL to receive your personal data from other parties (e.g. DUO, Studielink) and in some cases that personal data will be shared with national and international partner institutions (e.g. in the case of an exchange, or for the HBO monitor or for the National Students' Survey) or municipalities (e.g. in the case of a civic integration programme).

Leiden University of Applied Sciences also provides personal data to other organisations if required to do so by law (e.g. to DUO). In principle, Leiden University of Applied Sciences will only process personal data within the European Economic Area (EEA). If personal data is nevertheless processed outside the EEA, this is only permitted if an adequate level of protection is guaranteed.

### **Security of personal data**

Leiden University of Applied Sciences - together with any processors - ensures appropriate organisational and technical security of your personal data. Leiden University of Applied Sciences has a privacy and information security policy, which describes technical and organisational measures to protect your personal data from loss and unlawful use.

Examples of security measures are physical and digital access security, management of authorisations, encryption of data, logging and monitoring of ICT facilities, use of firewalls, training of employees, confidentiality of employees and supplier management.

That way, Leiden University of Applied Sciences ensures that this data is only accessible to those who are authorised based on their position, and that the data is only used for the purposes for which it was obtained.

### Your rights

As the person to whom the personal data relates (data subject), you have certain rights under the privacy legislation. If you want to exercise these rights, please send your request per email to: [loket.privacy@hsleiden.nl](mailto:loket.privacy@hsleiden.nl).

If you make a request, you may be asked to identify yourself to ensure that only you have access to your own personal data. Your rights are the following:

- a. **Right of inspection:** you may obtain an overview of and/or inspect the personal data that we process about you.
- b. **Right to rectification and addition:** if there are demonstrable mistakes in your personal data or if they are incomplete, you may ask for rectification of or addition to the data.
- c. **Right to be forgotten:** you may request that your personal data be deleted from the files of Leiden University of Applied Sciences. There are limitations to this, for example, because we have a legal obligation to process your personal data.
- d. **Right to restriction of processing of your personal data:** in certain cases, you may request Leiden University of Applied Sciences to temporarily stop processing your personal data.
- e. **Right to data portability:** in certain cases, you may request the transfer of your personal data to an entity designated by you. This will only apply if Leiden University of Applied Sciences processes your data on the basis of an agreement or your explicit consent.
- f. **Right to oppose/object to the processing of your personal data:** in certain situations, you may object to the processing of your personal data.

More information on the procedure of submitting the above-mentioned requests can be found in the *Procedure for Processing Requests concerning Rights of Data Subjects*.

### Procedure for reporting possible data breaches

Leiden University of Applied Sciences will do everything in its power to protect your personal data. Despite all (security) measures, a data breach can still occur.

Three categories of data breaches can be distinguished:

- *Breach of confidentiality*  
*In the event of unauthorised or inadvertent disclosure of, or access to, personal data.*
- *Breach of integrity*  
*When there is an unauthorised or accidental change of personal data.*

- *Breach of availability*  
*When there has been an unauthorised or accidental loss of access to, or destruction of, personal data.*

It is important to identify a (possible) data breach as soon as possible and to limit the (possible) consequences. Leiden University of Applied Sciences is very alert to this, but your help is also indispensable.

If you are aware of a data breach or suspect one, we ask you to report it immediately to the (digital) Service Desk (071-5188 900). The procedure for investigating, resolving and possibly reporting the data breach to the Data Protection Authority (DPA) will then come into force.

### **Amendments to the Privacy Statement**

Leiden University of Applied Sciences reserves the right to make amendments to the Privacy Statement. We therefore advise you to check the Privacy Statement regularly for any amendments.

More information about the *Policy on Processing Personal Data of Leiden University of Applied Sciences*, the processing of personal data and information security can be found on [mijn.hsleiden.nl](https://mijn.hsleiden.nl) ([sharepoint.com](https://sharepoint.com)) and the [website of the Data Protection Authority](#).

### **Questions, comments or complaints**

If you believe that this Privacy Statement is not being complied with, or if you have a complaint about the use of your personal data by Leiden University of Applied Sciences, or if you want to submit a request to make use of your rights, please inform the DPO by sending an email message to: [dorpel.vd.e@hsleiden.nl](mailto:dorpel.vd.e@hsleiden.nl).

If your complaint is not dealt with to your satisfaction, you may submit a complaint to the Data Protection Authority via the [website](#).

*Privacy Statement Students Leiden University of Applied Sciences*  
*Adopted by the Executive Board on 4 March 2024*