

Privacy policy Ganymedes LGBT Student Association Groningen

Last updated in November 2019

N.B. This document is an English translation of the dutch version of the privacy policy named 'Privacyverklaring'. The dutch version remains the only official privacy policy, and rights and duties can only be based on information in the official document. This translated version is merely a directive.

The Association

Ganymedes LGBT Student Association Groningen, located at Lissabonstraat 22-3 9718AZ in Groningen registered in the trade register of the Chambers of Commerce under number 01142256, accessible via the e-mail address: info@ganymedes-lgbt.nl, hereinafter referred to as "Ganymedes". The purpose of the association is:

- a) to offer lesbians, gays, bisexuals and transgenders (LGBTs) who study or promote at the University of Groningen and Hanzehogeschool a platform for relaxation and social contacts in a safe, unbiased environment;
- b) increase mutual awareness and understanding between LGBT students and other members of the University of Groningen and Hanze University of Applied Sciences and to act as a gay-straight alliance;
- c) propagate the views of LGBT students in all relevant bodies;
- d) promote equal treatment and rights of LGBT people in general.

Ganymedes hereby writes a privacy statement for the benefit of their members, donors and alumni, hereinafter collectively referred to as "members".

Collection of data

1. Ganymedes only processes personal data of its members. The personal and financial details that Ganymedes receives from its members are strictly confidential and are only used for association purposes if the board deems this necessary.
 - a) Personal data includes the birth name, desired name, date of birth, address, telephone number, e-mail address and student number provided by the member during registration with Ganymedes.
 - b) The financial data includes the bank details of the members, which are used to collect the contribution and to check payments for association activities. Only the board may

inspect this data. Committees can request information from the board about payments from members, the board only provides information if it deems this necessary.

2. Ganymedes bases the processing of the general data on the basis of two legal bases:

- a) Permission: When entering into membership at Ganymedes, persons wishing to register are required to complete the registration form. Personal details are requested on this registration form. All personal details entered are used for association purposes. By entering into membership, the person agrees to the processing of personal data. Registration is entirely voluntary.
- b) Justification: The membership administration and the collection of contributions make it necessary for Ganymedes to process personal data. Processing remains minimal by only granting the board access to this data.

3. Refusal to provide personal information

- a) When a member refuses to provide his / her / their personal and / or financial data, it is not possible to complete the registration with the association. Ganymedes needs this information for conducting member administration and collecting membership fees.

4. Special data that Ganymedes collects

- a) Ganymedes maintains a "no photo frame", members can be added to this list at any time during or after registration. The members on this list will never appear on images that the association distributes. In addition to the board, the Ganymedes Media Committee is responsible for protecting the privacy of members on this list.
- b) The association never registers and will never ask for information about orientation, gender identity, religion, health, race, political opinion or criminal history.

5. Retention period

- a) The association stores the personal data of members from the moment of registration until three years after deregistration.
- b) At the moment that a member deregisters, his / her / their details will be removed from the current membership list at

the end of the current academic year and moved to the archive.

- c) From three years after deregistration a former member can appeal to the board to destroy the personal and financial details. If a former member does not submit a request for removal, the personal data will be pseudonymized after five years and will be retained for statistical purposes.

Rights of data subjects

6. Data subjects have the following rights with regard to their privacy:
 - a) The right to transfer personal data.
 - b) The right to forget.
 - c) Right to view.
 - d) Right to rectification and supplementation.
 - e) The right to limit processing.
 - f) The right to a human look at decisions.
 - g) The right to object to the data processing.

7. Invocation of rights by the person concerned
 - a) The person concerned can invoke the rights from article 6 by contacting the board of the association in writing via: secretaris@ganymedes-lgbt.nl.
 - b) The board of the association is obliged to respond to requests made on the basis of the rights mentioned in article 6 within a period no later than four weeks. The board is only entitled not to cooperate with a request if there are compelling justified grounds for the processing that outweigh the interests, rights and freedoms of the data subject or that are related to the institution, exercise or substantiation of a legal claim.
 - c) If the board does not comply with the rights that the person concerned wishes to exercise, the person concerned can submit a complaint to the Dutch Data Protection Authority.

8. Complaint right of the person concerned
 - a) The member can submit an official complaint to the Dutch Data Protection Authority about the way in which the association handles the personal data.
 - b) The member can make use of the internal right of complaint of Ganymedes as stated in article 7.

9. Data protection officer

- a) According to Article 37 of the AVG, the association is not obliged to appoint a data protection officer.
- b) The secretary of the board is responsible for maintaining the membership. The secretary is also the designated contact person when it comes to data protection, although the entire management is responsible for this.
- c) For information, questions and complaints about data protection, a member can contact the secretary via: secretaris@ganymedes-lgbt.nl.

Provision of data to third parties

- 10. Ganymedes provides personal information to the Central Implementing Body for Student Organizations (CUOS) for applying for a scholarship. This only includes the necessary information, namely name, student number and date of birth. Financial data is not transferred to CUOS. CUOS is obliged to handle the information obtained confidentially.

Data breaches

- 11. According to the AVG, Ganymedes is required to document data breaches and, if necessary, to report them.
- 12. When a data breach occurs, Ganymedes is required to document this within 48 hours.
 - a) The documentation makes it clear at the first moment of notification, what data has been leaked and what is being done to retrieve the data in question.
 - b) If it is not possible to retrieve the data, Ganymedes must make a report to the Dutch Data Protection Authority and the person (s) involved.
 - c) Those involved must be notified within 48 hours that a leak has occurred, what information is involved and what Ganymedes can do to guarantee the privacy of the members.
 - d) After dealing with the relevant data breach, Ganymedes must make every effort to ensure that the privacy data of its members are better protected in the future.