

# Privacy policy

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2017/2018

Watt is privacy



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## 70 **1 Introduction**

Study association Watt (after this called 'S.v. Watt') understands the importance of properly storing personal information of its members, partners and other relations. Personal information is handled with the greatest amount of care and is properly protected. S.v. Watt abides to all the demands stated within the General Data Protection Law (After this referred to as GDPR).

The aim of this policy plan is to give adequate information regarding the handling of personal information by S.v. Watt. The board does this by explaining how personal information and data files are registered, processed and saved. The board also aims to give information about related topics like consultation, mutation, exchange and the giving out of information. The privacy policy contains all on- and offline systems used by S.v. Watt to handle the various types of personal data.

### 85 **1.1 Requirements for the processing of data by associations**

The GDPR has various demands for organizations that utilize administration files. These demands are as followed:

- Permission from a member to process his or her personal data;
- Keeping a correct and exact record of all member data;
- Security of data;
- If requested the possibility to view all stored information related to a member;
- The data only to be used for the goal for which it was initially gathered.

In accordance with the GDPR, S.v. Watt has permission to process personal data; *Categorie Bijzondere vereisten, vrijgestelde categorieën van verwerkingen (paragraaf 1): verenigingen, stichtingen en publiekrechtelijke beroepsorganisaties.*

### 95 **1.2 Additional demands**

In addition to the current demands stated within the GDPR, S.v. Watt has set out to formulate some additional demands for the processing of personal data. This policy also contains information for members, users, administrators and the designers of our systems this to ensure that in the future the board will still act according to the privacy laws.

### 100 **1.3 Systems**

S.v. Watt processes personal data using the following systems. For most of its storage S.v. Watt works together with Dropbox, Dropbox fully works according to the demands set within the GDPR. The remainder of our systems works with either European servers or local storage.

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110 **1.3.1 Kassaboekhoudsysteem**

The Kassaboekhoudsysteem (after this referred to as 'KBS') is essentially the archive of the entire association. This custom designed excel sheet is stored on the cloud, locally on a computer and occasionally a backup is made on a thumb drive. This system stores all data regarding membership information and financial information in a central location. This file can only be viewed by the board members of the current year and system designers who have all signed a non-disclose agreement (NDA). The secretary and treasurer are mainly responsible for the KBS, other board members may however access and mutate the data.

115 **1.3.2 Kassa**

Members of the association have the possibility to buy food, drinks, merchandise and register for activities within the association. To properly process all these payments a 'kassa' system is used. This system contains the name and payment information of a member and is synchronized to the KBS. This system has a password protected admin account which can only be accessed by the treasurer. The treasurer can use this account to insert purchases made by members, sent out payment requests related information to all members and to

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**1.3.3 Svwatt.com**

The website [www.svwatt.com](http://www.svwatt.com) has two purposes for which it is mostly used. The first use is to display information regarding the association. Further if a user logs in it is possible to look at photos of events. Secondly the website is used to sign up for various activities. File and database storage happens through Strato's servers which are located in Germany.

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**1.3.4 Svwatt.com mail addresses for board members and committees through Strato**

Every board member has a @svwatt.com email address in accordance to his or her function. Furthermore, each official committee is able to apply for their own email account. These emails are sent through Strato web services.

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**1.4 Privacy statement**

S.v. Watt works with private information and aims to communicate clear and transparent about what happens to your information. In the privacy statement one finds answer to the most important questions related to the processing of private data. The privacy statement can be found on the website ([svwatt.com/privacy](http://svwatt.com/privacy)) and is added in the appendix of this policy document.

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**1.5 Updates privacy policy**

S.v. Watt retains full permission to make changes to this policy document. It is recommended to regularly check this document to know about any changes that might occur. The privacy policy can be found at [www.svwatt.com/privacy](http://www.svwatt.com/privacy).

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## 2 Registration and visibility of personal data in the KBS

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### 2.1 Data matrix

The following personal information is registered in the KBS by S.v. Watt. Each *record* in the database is connected to a unique index number.

	Visible to commission	Visible to board	Required	Mutable
<b>Basic information</b>				
First name	x	x	x	
Family name	x	x	x	
<b>Address information</b>				
Landline		x		x
mobile number	x	x	x	x
E-mail address	x	x	x	x
Date of birth		x	x	
Study	x	x	x	x
Payment info		x	x	x
Dietary wishes	x	x		x
Membership status	x	x		x
Remaining info		x		x

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1. Data registration

### 2.2 Registration of additional information

A committee connected to S.v. Watt can require additional information for its activities. This for example might be necessary when an activity requires ID or passport information. The data collected for this excursion is kept for as long as necessary for organizing this excursion.

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### 2.3 Registration of special information

Special information may only be processed if it is explicitly necessary. Within an association it is only allowed to keep track of health related information to be able to properly care for a member.

All other types may not be registered, unless it is clearly necessary and the member gave approval for the registration.

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Some information should be handled with extra care. Examples of this is information related to the religion or health of a member. These types of data may lead to additional risk as it might lead to unwanted connections. Under some circumstances it might be necessary to have access to this type of information.

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### 2.3.1 Definition of special data

Classified as special data is:

- Religion
- Race
- Political leaning
- Sexuality
- Membership of an association
- 'Burger Service Nummer' (BSN)

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### 2.3.2 Medical data

It might be necessary to collect some medical data for the safekeeping of members during camps. This data must be destroyed when it is no longer necessary for the activity for which it was originally collected. Data specified under 2.3.1 may not be collected as 'medical data'.

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### 2.3.3 Confidentiality

Individuals who have permission to register and look into personal data are obliged to keep all data secret unless they are by law required to share it. The board enforces this rule by having anyone who might come in contact with personal data sign an NDA.

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### 2.3.4 Expiry date

Special data may only be kept for a pre-determined and pre-decided term. After this period this data should be destroyed. It should be clear to a member why this data was collected and for how long it will be kept.

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### 2.3.5 Safekeeping

A standard sign-up form does not contain any type of special information. When for a special occasion one needs to deviate from the standard forms and collect special data a few steps should be taken. A request should be send out to those responsible in the association (= the board). This request should contain at least: Which type of data is to be collected, why this data is to be collected and for how long this data is needed. After this full board approval is needed before commencing with the collection.

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## 2.4 System- and data management

Data and applications used within S.v. Watt require some level of maintenance. Knowing there are two data collection applications within S.v. Watt it is important to know and recognize who can view what. First the board has the 'KBS' this is the brain of the association. This program is normally only viewable and editable by board members, when maintenance is required pre-determined people might be able to look at the personal data. Secondly the association uses the website, through the website members can sign up for various activities. The maintenance for this website is done by the website committee of S.v. Watt.

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## 2.5 Permissions

The assigning of permission within the used application is viewable in the permission model. Usually permissions are connected to a specific function. If an individual loses his function he will of course be stripped of his permissions. Within our applications permission is granted on a top-level this to ensure a user is not able to give permissions to himself.

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### 3 Distribution, exchanging and usage of personal data

As an addition to the strict privacy laws imposed on S.v. Watt there are also several decisions formulated by the board on the exchanging of personal data.

#### 260 3.1 General

##### 3.1.1 Who processes?

- Board members

265 *In practice a board member is able to view, edit and register all data contained within the KBS and the website. Specific board members are assigned to the various tasks surrounding the administration. The secretary is in charge of signing up new members and the treasurer of all things financial.*

- Treasurer

270 *The treasurer is in charge of all things financially required for the running of the association. He or she has access to all financial data.*

- Secretary

275 *The secretary is in charge of the registering and mutating of all information related to members within the administration.*

- Committee members

280 *Within official committees there are some pre-determined individuals who have reasons to access personal data. This access is needed for organizing the activities, individuals with access need to sign a NDA.*

##### 3.1.2 Usage of personal data conditions

Usage of data must meet the following requirements:

1. A clear goal needs to be formulated before data can be collected; beforehand it should be clear for how long the data is kept.
2. It is only allowed to collect relevant information.
3. A permission model needs to be designed which shows which person is able to access what data. In addition to this adequate security measurements need to be applied.
4. Data may not be shared with third parties unless a member gave explicit approval, or it is required by law.
5. Data may only be kept for a pre-determined amount of time and need to be removed after that. A member should have the possibility to remove his or her data at any point in time.
6. It is only allowed to save special data if this is explicitly required and explicitly allowed by the individual in question. This data needs to be fully removed at the end of the event for which it was gathered.
7. The collecting of data happens in accordance with the privacy policy and the GDPR.

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## 3.2 External parties

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- Providing personal data, addresses and e-mail addresses of members of the association to third parties is not allowed for any reason.
  - S.v. Watt gives its sponsors the possibility to advertise through various communication channels. These advertisements are critically evaluated before being sent out to the members. It is important to know that these e-mails will always be sent through us, a third party will not receive access to your e-mail address.
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## 3.3 Mailing

- S.v. Watt will never send a physical letter to your home address unless this is necessary for financial reasons.
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## **4 Registration of personal data for the purpose of providing services**

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### **4.1 Purchasing products**

360 S.v. Watt gives its members the possibility to buy various goods through a practical and mostly automated system. For this system the board uses a separate 'register'. This register is connected to the main 'KBS' as it uses this to connect the purchases to an individual. Once a month a member receives an e-mail from this system detailing the purchases made within that month. Financial information is kept for a maximum of seven years starting the year of the financial mutation in accordance with Dutch laws.

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## 385 **5 Mutation of personal data**

For the main storage of data, board members are responsible for the data and are the only one's able to edit it. Who can edit what and who is responsible for these edits is specified within the permission matrix. In this chapter a summary of the permission matrix is given.

### 390 **5.1 Mutations in personal data**

It is currently not possible for a member to view who edited his personal data, one can assume that this editing would be done by the secretary who is responsible for the membership data. But due to the current working of the system this cannot be tracked accurately.

#### 395 **5.1.1 Who is able to mutate?**

Upon request a member is able to ask for an update to his or her personal data. This can be done to update home addresses, phone numbers, mail addresses and payment information. Unless a typo was made it is not possible to change first/last name, date of birth or student number. Officially the secretary is responsible for keeping the databases up to date, in practice other board members will also edit the database.

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The information saved within the main database are synchronized to the register, this register only contains information necessary to process purchases one by a member.

The website is used to sign-up members for various activities, data registered through the website cannot be edited, and they can only be removed.

### 405 **5.2 Mutation by a member**

Due to the working of the systems in place it is not possible for a member to directly change his or her information or directly view it. In order to view and or edit the information saved by S.v. Watt the member has to send in a 'viewing request' which can be done by email to [privacy@svwatt.com](mailto:privacy@svwatt.com) .

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425 **6 Archiving of personal data**

The 'KBS' is essentially the members database. It is forbidden to make copy's on or store the database on any other medium than the main storage account owned by the association. It is also prohibited to pass on any information found within this system to individuals who normally would not have access to it.

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A second system in the archiving of data is the website; information submitted to the online form will be used to organize activities. This data needs to be removed at the end of the excursion or when it is no longer necessary for the organization of the activity.

435 **6.1 Lists**

It is prohibited to export data from the KBS to another document. Excursions and activities however do require some sense of data to organize their activities, to make sure the committees are not hindered in the organizing of their activities they are able to export the data which is gathered through a sign-up point on the website. This data will be exported by a member of the website committee or the board. Furthermore, this data may not be kept for longer than necessary to organize an activity to a maximum of six months total. When one of these points is passed the data needs to be removed.

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When an external or physical list is made it will be kept for a minimal amount of time as described in the previous text. Saving data on a different location leads to potential security issues because it is no longer stored on a Watt system. An individual who exports data and compiles a list on an external storage unit is held fully responsible for the safety of the data.

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**6.2 Copy**

As mentioned earlier it's prohibited to make any external copies of the KBS. In canon with the previous statement it is also prohibited to make any copies of the lists as mentioned under *6.1 Lists*. These lists are created for the sole purpose of organizing an activity and may not be shared outside of the committee for which it was created. Of course the board demands those in possession of a list within a committee to take proper care of any data.

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**6.3 Publishing**

The data stored within the KBS are strictly personal. As such it may not be published outside of the KBS unless explicitly approved by the member mentioned within the data.

460 **6.4 Removal**

Exported data must be kept for as little time as necessary. The individuals who export data from the website as is approved under *6.1 Lists* is fully responsible for proper destruction of the data; it must be made impossible for any unauthorized individual to recover the data.

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## 6.5 Alumni

Data stored within the KBS is kept for as long as an individual is member or donator of the association. This entails personal data and payment information.

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When a member decides to leave S.v. Watt most of his data is removed, the board only keeps the bare minimum necessary for the organization of reunions.

Data of ex-members may only be viewed by board members. The data saved pertaining to ex-members cannot be altered and are only used for statistical, historical purposes and in order to organize reunions.

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## 6.6 Maintenance of the KBS

During the maintenance of the KBS it might be possible that one of our system designers is able to look at the stored personal data. For them to get access to the KBS they will need to receive full board approval each year. These members will also be obliged to sign a NDA, this to ensure the security of the data they might be able to access.

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## 7 Sending messages

### 7.1 OPT in/out

525 S.v. Watt is allowed to send members e-mails containing information related to membership, and  
information related to the participation in activities. These e-mails may be sent out without  
approval of the receiver. Under normal circumstances this will always be through e-mails, if however  
530 necessary for financial related information it is also allowed to send letters to the registered home  
addresses. An OPT out request can be send in through the board. Opting out means a member can  
announce he/she no longer wants to receive e-mails related to Watt.

#### 7.1.1

535 It is not possible to OPT –Out of system messages, messages containing critical information  
pertaining to the membership and financial messages.

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## 570 **8 Online media**

In the modern world the association cannot go without the usage of online media. Knowing there are a lot of positive points pertaining to the usage of online media there are also several points which deserve additional attention, for example the laws surrounding the usage of cookies. Furthermore all online media channels associated with S.v. Watt work in accordance with the written statement and guidelines.

### 575 **8.1 Cookie statement**

Websites associated with S.v. Watt make use of cookies; these are used to improve the overall functionality of the websites. The association uses cookies for:

- 580 • Saving preferences relate to language and search results
- Detecting your browser settings in order to optimize the website
- Detecting abuse of our website by for example tracking the amount of failed login attempts
- Controlling the load on our website to optimize its accessibility
- 585 • Allowing for a user to react to our website
- Cookies related to statistics

#### 8.1.1 Analytics

S.v. Watt also uses cookies for statistics; these utilize Google Analytics (\_umtzt, \_utma, \_utmb, \_utmc):

- 590 • Keeping track of the amount of visitors on our pages
- Keeping track of the time spent on our website
- Evaluating which parts of our websites require improvement
- 595 • Optimizing the website

#### 8.1.2 Remaining cookies

600 Due to the way the internet and websites work it is not always possible to give insight to all cookies on our websites which are added by third parties. These cookies are usually added when a webpage makes use of embedded elements; texts, documents, images and videos which are hosted by a third party but shown on our website.

605 When you find cookies like this on our website let us know by contacting the board. Or directly take up contact with the third party who placed the cookies ask them: what the reasoning is behind the placement of their cookies, what cookies they use, how long these cookies stay active and how they aim to keep your privacy safe.

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### 8.1.3 Social media

615 S.v Watt uses various forms of social media to promote their activities. The association is in no way responsible for the cookies and trackers which are present on these websites, usage of these websites are entirely the responsibility of the individual using it.

### 8.1.4 Websites which make use of this cookie statement:

- [www.svwatt.com](http://www.svwatt.com)

### 620 8.1.5 Closing statement

Due to changes to the law pertaining to the usage of cookies it is possible that the association needs to occasionally edit our websites or rules surrounding the usage of cookies. The association allows itself to change our statements and cookies which are viewable in the above lists without any form of announcement. The association advises you to regularly check this information for a newer version, this in order to evaluate your decision in the approval of these cookies.

## 8.2 Disclaimer svwatt.com and social media accounts

630 The websites utilized by S.v. Watt are created with the greatest care. Even though S.v. Watt attempts to give factual, exact and actual information from credible sources, the association does not give any guaranties that the information provide through the website is in anyway factual, exact or actual. Decisions using the information found through our website are entirely of your own responsibility.

S.v. Watt cannot promise that our website will run without any hiccups.

### 635 8.2.1 Information related to third parties, products and services.

In a situation where S.v. Watt places a hyperlink to a third party website the association cannot promise that the information found on the website is factual or recommend the website. The usage of such hyperlinks is entirely to the risk of the user. S.v. Watt takes no responsibility for the content, the usage or the availability of such websites. S.v. Watt did not check if such links are factual, conform the truth and providing full information.

### 8.2.2 Personal data

645 In order for a user to sign in through [www.svwatt.com](http://www.svwatt.com) its login information is registered within the website. This data is explicitly used to allow the user to login to our website.

### 8.2.3 Exclusion of liability

650 S.v. Watt takes no liability for any direct, indirect, special, incidental or immaterial, regardless of the fact that S.v. Watt was informed about the possible damage that may have been caused by (i) defects, viruses connected to the machine or software used to gain access to the website, (ii) information which have been published through this website, (iii) the interception, mutation or in any way changing any information received from the website, (iv) the working or the lack of availability of this website, (v) Abuse of this website, (vi) loss of data, (vii) the usage of software downloaded through this website, (viii) claims of a third party with relation to this website.

655 This exclusion of liability is extended to board members and voluntary committee members within S.v. Watt.

## 8.2.4 Application of law

Dutch laws apply to this website and the disclaimer.

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## 8.2.5 Changes

S.v. Watt gives itself full rights to change any information found on the website and within this disclaimer without any type of announcement. The association recommends to regularly check the information on our website and in this disclaimer for the latest information.

## 8.2.6 Documents, illustration, (image) material and content

Most content, documents, images, logos and pictures found on this website are owned by S.v. Watt, photographers and its partners. When you want to make use of any of the content provided through this website you can contact [privacy@svwatt.com](mailto:privacy@svwatt.com).

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During activities the association takes pictures which are uploaded to our website and to our social media channels. Starting the 25<sup>th</sup> of May S.v. Watt always strives to receive proper approval before uploading these images. For removal of online images a request can be send to [svwatt.com/privacy](http://svwatt.com/privacy).

## 8.3 Data leaks

As one should expect S.v. Watt does everything in its power for our stored personal data not to fall into the hands of a third party. When this does happen the association has a data breach or data leak.

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In article 34a of the law protection of personal data (Dutch law) in act since the first of January 2016 it is stated that any data breach should be reported. The law explicitly states that this entails personal data leaked through security problems. This data leaks must always be reported to the authority personal data (AP), previously known as CBP

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### 8.3.1 Procedure detection data leaks

A data leak can be detected in various ways. Generally, this leak is first detected by a board member or a website committee member. The association constantly strives to find vulnerability's within our software, when vulnerability is found this does not mean the data was obtained by third parties.

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### 8.3.2 Procedure data leak communications

#### 8.3.2.1 Communication to the supervisor

When a data leak is detected S.v. Watt is required to report this leak to the one responsible for all privacy related businesses. This report contains at least:

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- The type of breach
- Who to contact for information regarding the leak
- Recommended actions to minimize the negative effects of the leak
- A description of the possible effects of the leak in relation to the processing of personal data
- Actions taken by the organization to prevent these types of leaks in the future

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#### 8.3.2.2 Communication to members

After a leak has been detected and there is reasonable cause to assume that the leak will have negative implications to the personal life of a member, this member needs to receive a warning relating to the leak. This warning needs to contain at least: the type of breach, who to contact for more information and recommend actions to minimize the effects of the leak.

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## 9 Unauthorized usage of personal data

### 705 9.1 Preventing unauthorized usage of personal data

Unauthorized usage of personal data is seen as the usage of personal data in anyway not stated within the law or in the policy plan. Unauthorized usage might happen on accident, when someone does not know about the rules. It is also possible that the unauthorized use happens fully knowing the rules and thus happens with premeditation. For this policy plan the association classifies both accidental and premeditated usage as 'misuse'. Misuse can lead to damage to individuals or the organization.

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Misuse is seen as:

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- A person who is not authorized who accesses and uses data he or she is not authorized to use.
- The usage of data which is not registered or which may not be used.

To prevent misuse it is important to set up rules and guidelines. It is important to have a policy plan regarding privacy and the usage of personal data and clearly communicate these decisions. Having clarity about the usage of data prevents most cases of accidental misuse.

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In addition to policy and communication S.v. Watt also utilizes several tools to help prevent misuse.

#### 9.1.1 Supervision

Each year a predetermined group of people will have access to the membership database. This predetermined groups is appointed when a new board is voted in and when this board unanimously approves a specific member to access the data. In practice the board and the software designers are the only people with access. All these individuals who have access must follow strict guidelines.

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#### 9.1.2 Non-disclosure agreement

Individuals who have high-level access to the administration must sign a NDA at the start of their function. In this NDA it is stated that they must be careful when using personal data.

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### 9.2 Reporting abuse

When someone suspects the misuse of personal data in any way whatsoever, one is strongly obliged to report this abuse to the board of S.v. Watt, this to allow action to be taken. For contact information one should view chapter 10.

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### 9.3 measures

Misuse of data in accordance with the level of misuse will lead to one of the following measures: a warning, removal of access rights to data, ending of the function and if necessary the termination of (board) membership. Furthermore, there will always be research to check if this type of misuse can be prevented in the future.

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## 10 Questions or complaints

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Questions related to privacy within S.v. Watt can be send to [privacy@svwatt.com](mailto:privacy@svwatt.com) .

This address is also used for complaints or reports.

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To correctly handle each report the association will register information. Using this information the association can get in contact with the individual who send in the report.

When a report is made the association will attempt to find out:

- Where does the used data come from?
- What happen to the data
- Who was involved
- If damage has been done and how this can be minimized
- If steps must be taken to prevent repeated abuse

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## 795 **Appendix 1: Privacy statement**

### **Privacy statement student association Watt**

800 In this privacy statement the association aim to give answers to the most important questions with regards to the processing of personal data by student association Watt (after this called S.v. Watt If you desire to read a more in-depth overview of our privacy policy you can read the privacy policy on our website.

#### **What is classified as personal data?**

805 Every institute nowadays collects a certain amount of data. For the members of in this case student association Watt it is important to know what we do to protect your personal data. It is important to know what is classified as personal data; personal data is data that says something about you. Examples of this are name and age. When (a combination of) this data could be used to trace back directly to you we are talking about personal data. Examples of this are your address, date of birth  
810 but also your first name in combination with your date of birth. When in this case a student association processes this type of data we are obliged to do everything necessary to safely handle this data. Pictures and video are also classified as personal data.

#### **Whose personal data is Watt processing?**

815 Watt processes personal data of individuals with whom we have, want to have or have had a direct or indirect relation. Some examples of these are:

- Members of the student association.
- 820 • Non-members who sign up for our various activities.
- Former members
- Companies with which we had various levels of contact.

#### **Who is responsible for the processing of data within Watt?**

825 Within the student association we collect various types of data. This data can mainly be divided into two categories:

- 830 1. Information kept within the member's database, this database contains: Names, addresses, payment information, date of birth and membership status. This data can only be viewed by the board members of the current year and former board members who do the maintenance of this database.
- 835 2. Activity registration information. The association also collects data from users who sign up for activities. This information is kept for short term processing and then safely disposed of.

Each year the board assigns one board member who will be responsible for all things privacy related within Watt.

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845 **What is your personal data used for?**

When one wants to become a member of Watt or start any type of relation with us, we require a certain degree of personal data. Using your data we are able to properly sign you up for all the functions within our association

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Once you become a member of the association we want to properly provide our services to you. The information we collect is used to sign you up for activities, to streamline our payment process and to inform you about anything related to our activities.

855 Stored data can be used for promotional and marketing goals. Examples of this are: information regarding activities and in order to receive our newsletter. These promotional emails will always be sent from our servers so an external company will be unable to receive your data without your knowledge.

860 We also need some data for practical processes. We need this to support our administrative processes regarding contribution and statistical analysis.

**Is Watt processing 'special' personal data?**

865 With special personal data we are referencing to data that is extra sensitive. Examples of special personal data are data pertaining to health or race. This type of data is only processed by us when it is explicitly approved by you and it's necessary for our services. The special personal data processed by us pertains to health; this includes dietary wishes and allergies.

**How is my data handled by Watt?**

870 Your personal information is kept in a safe place and is kept no longer than necessary for normal usage within the association or the goal for which it is being used.

*Who has access to my personal data?*

875 As mentioned earlier the data is divided in two parts. We have data that is kept in a database; this is personal information which can only be viewed by the board members of the current year and in exceptional cases be viewed during maintenance.

880 The other type of data is the data used by the various committees. This data is used to sign you up for various activities, this data is kept for up to a year maximum. The people who have access to personal data within a committee are obliged to sign a NDA.

**What are the rules regarding the processing of personal data?**

When processing personal data S.v. Watt abides to the Dutch laws and guidelines.

**Is it possible to directly view the data saved by Watt?**

885 It's not possible to directly view the data which is saved by Watt. It is however possible to view your personal data upon request. This can be done by sending a request to [privacy@svwatt.com](mailto:privacy@svwatt.com)

**Where can I go for a complaint or question?**

890 For questions or complaints regarding the processing of personal data by S.v. Watt, one should send an e-mail to [privacy@svwatt.com](mailto:privacy@svwatt.com)

895 **OPT-out**

To optimize services provided by S.v. Watt we make use of certain (automated) messages. This entails messages with information regarding to activities, payment information and important messages regarding the association. It is not possible to OPT-out of any of these messages.

900 **Changes to the privacy policy**

S.v. Watt gives itself full rights to make changes to the privacy policy. It is recommended to often check the privacy policy for changes to make sure you are up to date on any changes made. You can save the privacy policy yourself or reach it through [www.svwatt.com/privacy](http://www.svwatt.com/privacy) .

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## Appendix 2: abbreviations

KBS	Kassaboekhoud systeem
S.v. Watt	Student association Watt
NDA	Non-disclosure agreement
GDPR	General Data Protection law
OPT in	I want to receive messages
OPT out	I do not want to receive messages

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