

PRIVACY DECLARATION S.G. DAEDALUS

S.G. Daedalus, study association of Industrial Design Engineering at the University of Twente

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DISCLAIMER

This English document does not serve as a legal document, but only serves as an informative piece.

The Dutch version of the privacy declaration serves as the legal document.

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1 INTRODUCTION

This document describes how personal details are being handled which are used and documented for the member administration of S.G. Daedalus.

2 DESCRIPTION OF THE DATA PROCESSING

2.1 DESCRIPTION PROCESS

The data from the member administration of S.G. Daedalus is being used to facilitate the activities organised by S.G. Daedalus. Furthermore, personal details are being used for contact through post and email between S.G. Daedalus and the member. Bank details are being used for the collection of contribution, participation fees of activities organised by S.G. Daedalus and expenses for purchases at S.G. Daedalus, such as drawing materials.

2.2 OBJECTIVE

Data from the member administration is being used to facilitate the activities organised by S.G. Daedalus, the contact by means of post and email between S.G. Daedalus and the member and to collect contribution, participation fees of activities and purchases at S.G. Daedalus.

2.3 FOUNDATION

The processing of data from the member administration is justified, based on the following foundation:

Article 6, paragraph 1a of the GDPR. A member of S.G. Daedalus gives permission to the processing of their personal details.

2.3.1. CONSENT

During the registration of a new member, the member is explicitly asked for consent of the processing of the collected data which can be found on the registration form. The granted permission is in agreement with the in this document mentioned processing objectives, as mentioned in chapter 2.4.

The permission is being documented by ticking off a checkbox during the registration process of new members. A new member is ought to tick off this checkbox themselves.

2.4 INVOLVED DATA

2.4.1 DATA MEMBER ADMINISTRATION

The data below can be archived in the member administration of S.G. Daedalus. This data is only acquired by having the (prospective) member filling in this data themselves. The mandatory data for registration has been indicated with an asterisk (*).

- Date of registration of the member*
 - For check of the start of the contribution collection.
- Initials*
 - Initials are necessary for the identification of an individual member in combination with the last name and possibly the first name for affairs such as (book) sales and activities.
- First name
 - The first name is necessary for the identification of an individual member in combination with the last name and initials for affairs such as (book) sales and

activities. Furthermore, the first name, in combination with the last name, is being displayed at "birthdays" on the website of S.G. Daedalus, as well as on the screens within the accommodation of S.G. Daedalus.

- Last name*
 - The last name is necessary for the identification of an individual member in combination with the initials and possibly the first name for affairs such as (book) sales and activities. Furthermore, the last name, in combination with the first name, is being displayed at "birthdays" on the website of S.G. Daedalus, as well as on the screens within the accommodation of S.G. Daedalus.
- Date of birth
 - The date of birth is used to be able to display birthdays on the website of S.G. Daedalus, as well as on the screens within the accommodation of S.G. Daedalus.
- Email address*
 - The e-mail address is used as the primary means of communication from S.G. Daedalus to a member. Issues such as association mail, information about activities for which the member concerned has registered and announcements of direct debits are provided via this communication channel.
- Mobile phone number*
 - The mobile phone number is required when a member needs to be contacted quickly and directly. Telephone numbers are also used for contact with debtors.
- Phone number of parent(s)
 - The telephone number of parent(s) can be used when in case of emergency the parent(s) must be contacted.
- Address data
 - Address data are used for paper communication. This includes but is not limited to paper mail and the delivery of the InDepth, the association magazine of S.G. Daedalus.
- IBAN-number*
 - The IBAN-number is required for the direct debits, which are executed in combination with the SEPA authorization which is signed by the member at registration.
- BIC-number
 - The BIC-number is required for making direct debits possible in the case of an IBAN-number not starting with 'NL'.
- Type of member*
 - The 'member type' is selected to ensure that a member receives the right communication. With 'type of member' you can choose between "Student", "Employee" or "Other". It is also recorded whether the member "first member", "second member", "Honorary member", "Donator" or "Alumnus" is at S.G. Daedalus. This is kept to determine the size of the contribution.
- Whether or not to receive the InDepth
 - It is selectable if a (prospective) member wants to receive the association magazine 'InDepth' at the given address.
- Student number at the University of Twente*
 - The student number is used as reference number for direct debits that are made on the basis of contribution, participant's contribution of activities of S.G. Daedalus and purchases from the store. Student numbers are also used as a username for logging in to the website of S.G. Daedalus.

- The fact that a member has agreed to the online conditions of membership of S.G. Daedalus.*
 - The (prospective) member must explicitly agree to the online which apply to a membership of S.G. Daedalus.
- It is recorded which 'groups' the member is part of. These 'groups' can be a board or a committee.
 - These groups are used for publication on the website, such that it can be communicated who is part of a particular board or committee. This is done to clarify who is responsible for certain matters within a board or committee.
- It is recorded to what activities the member was subscribed and is subscribed to.
 - Because there are costs attached to certain activities, it is necessary to know which members have participated in preparing the collection for a member. Next to that it is possible for members to see which other members have signed up for an activity for promotional purposes.
- It is recorded which expenses are made by a member.
 - To ensure that each member receives the correct invoice for costs incurred during activities and purchases from the store, the costs are made per member.
- Commission and board photo's
 - If a member is part of a committee or board, it is possible that group photos of the committee or board are placed on the website of S.G. Daedalus, including names.

2.4.2 SPECIAL CATEGORIES OF PERSONAL DATA

In the member administration of S.G. Daedalus membership administration of S.G. Daedalus no special personal data are recorded, as defined in Article 9 of the GDPR.

2.5 PROVISION OF DATA

For certain occasions, data is provided to external parties, which will be described in this chapter.

2.5.1 INTERNAL

Within the association, necessary information is provided to the board and committees. The exact data that will be provided will vary per board, commission and per activity. The data is provided with the aim of tuning the activities with the participants and drawing up attendance lists. During activities of S.G. Daedalus it is possible that pictures are taken for promotional purposes. These pictures are published on Google Drive, the management of which lies with the board of S.G. Daedalus. A request to remove pictures can be submitted to the Board of S.G. Daedalus, as stated in 3.3.4

2.5.2 EXTERNAL

Certain activities will be provided to external parties, to facilitate certain services for the members. The overview of parties within the EU/EER with whom data is shared, including the goal why the data is shared, is displayed below.

- Helloprint
 - Printing company Helloprint prints the association magazine "InDepth". The first and last names of committee members of the editorial team of the InDepth are provided from the members administration. The board of S.G. Daedalus agrees to Helloprint's privacy statement which states which (privacy) rights and obligations S.G. Daedalus and Helloprint have.
- Microsoft/Office 365
 - The member administration of S.G. Daedalus is processed with Office 365. The student number, bank account number, BIC code, first name, last name, initials, e-

mail address and authorization date are entered in Office 365. The board of S.G.

Daedalus agrees to the privacy statement of Microsoft which states which (privacy) rights and obligations S.G. Daedalus and Microsoft have.

- Evenementenbureau (Event agency)
 - To register activities organised by S.G. Daedalus that take place on the campus on the University of Twente correctly, the first name, last name and telephone number of the present Emergency Response Team members are provided to the event agency of the University of Twente. The first name, last name and telephone number are also provided to the security.
- Unit4
 - Unit4 Multivers is the accounting system used by the board of S.G. Daedalus. Student number, first name, initials and last name are provided to Unit4. The board of S.G. Daedalus agrees with Unit4's privacy statement which states which (privacy) rights and obligations S.G. Daedalus and Unit4 have.
- Rabobank
 - The money transactions from and towards S.G. Daedalus are facilitated by Rabobank. The initials, last name and bank details of members are provided to Rabobank. The board of S.G. Daedalus agrees with the privacy statement of Rabobank which states which (privacy) rights and obligations S.G. Daedalus and Rabobank have.

2.5.3 OUTSIDE OF EU/ EER

Certain activities will be provided to external parties, to facilitate certain services for the members. The overview of parties outside the EU/EER with whom data is shared, including the goal why the data is shared, is displayed below.

- Google
 - Committees of S.G. Daedalus work with agendas, minutes and data of activities that they share and exchange through Google Drive. The board of S.G. Daedalus uses services from Google. This includes but is not limited to services like Gmail and Google Calendar. The board of S.G. Daedalus agrees to the privacy statement of Google stating which (privacy) rights and obligations S.G. Daedalus and Google have.
- MailChimp
 - The association mail from S.G. Daedalus is sent via MailChimp. For this purpose, the board provides e-mail addresses, as well as first and last name to MailChimp. Photographs by members of S.G. Daedalus are sometimes used in the association mail. For this, explicit permission is always requested from the relevant member. The board of S.G. Daedalus agrees with MailChimp's privacy statement which states which (privacy) rights and obligations S.G. Daedalus and MailChimp.

3 PROCESSING ORGANISATION

3.1 SECURITY MEASURES

Access to the data lies with the board of S.G. Daedalus. They possess the log-in data that provides access to the membership administration, and also manage the data. In addition, the website committee, which is responsible for managing the website of S.G. Daedalus, has access to the back-end of the website, with which they also have access to the membership administration.

Furthermore, paper copies of member registration and GMM documents are stored in the filing cabinets, the management of which lies with the board of S.G. Daedalus.

3.2 DATA PROTECTION IMPACT ASSESSMENT

S.G. Daedalus does not perform PIA. This has been decided on the basis of article 35, paragraph 3 of the GDPR. The cases mentioned in this paragraph do not apply to S.G. Daedalus.

3.3 RIGHTS OF THOSE INVOLVED

In the GDPR, multiple rights are set for the data provider. This concerns articles 15 up to and including 22 of the GDPR. This chapter explains the applications and implementation of these rights.

3.3.1 RIGHT OF ACCESS

A member has the right to access the data at any time according to article 15 of the GDPR. Access to data and processing purposes can be obtained by submitting a written request to the board. The board will then provide this inspection within one workday.

3.3.2 RIGHT TO RECTIFICATION

According to Article 16 of the GDPR, a member has the right to rectification of incorrect personal data. A member can change his personal data in the membership administration by passing on the data to be changed to the board of S.G. Daedalus. The board of S.G. Daedalus will then implement these changes within one working day.

3.3.3 RIGHT TO ERASURE

When a member concerned wishes to have his or her data deleted, a request can be submitted to the secretary of S.G. Daedalus. If another (contribution) collection has yet to be carried out, the data will remain temporarily stored. When such a collection does not have to take place anymore, the data is anonymized.

3.3.4 RIGHT TO RESTRICTION OF PROCESSING

When a member concerned wishes to limit his or her data processing, a request can be submitted to the board of S.G. Daedalus. The board of S.G. Daedalus will then delete the desired data from the membership administration. All data can be removed from the membership administration, with the exception of the mandatory data, as indicated in 2.4. If a member wants one of the mandatory data to be anonymised from the membership administration, membership will have to be terminated.

3.3.5 NOTIFICATION OBLIGATION

If rectification, erasure, anonymisation or limitation has been applied, the person concerned will be informed accordingly. This is done by sending a written message to the member by e-mail.

3.3.6 RIGHT TO DATA PORTABILITY

The member concerned can request his data from the board of S.G. Daedalus. This makes it possible to visualize which data can (be) processed.

3.3.7 RIGHT TO OBJECT

The member concerned may raise objections of processing to the board of S.G. Daedalus. Subsequently, the processing of data entered by the data subject will be stopped. If the person concerned raises objections to processing regarding the mandatory data mentioned in chapter 2.4, this will most likely amount to the termination of the membership.

3.3.8 AUTOMATED INDIVIDUAL DECISION MAKING

At S.G. Daedalus, no fully automated data processing takes place. With every processing operation there is human input.

3.4 STORAGE PERIOD

Membership data is not immediately removed from the database when a request to cancel membership is submitted. As stated in the statutes of S.G. Daedalus, Article 8, paragraph 1, a member must pay his/her entire annual contribution, even if membership is terminated during the course of the year. This means that data from the member concerned are stored until the last debit moment. Subsequently, the status of the member is changed to "Former member", where it is not possible to view data except student number, initials, first and last name and the registration date of the member in question. At the moment it is still possible to restore the data of a member, in case a member has been unintentionally unsubscribed. If a member has the status "Former Member" for seven years, the statutory term with respect to the tax authorities, the member's details will be permanently anonymized from the membership database.

3.5 DATA LEAKS

When a data leak occurs, the board of S.G. Daedalus will inform the relevant members of the leak within the period of 72 hours of leak detection, as stated in the GDPR. In the meantime, but also subsequently, the board will investigate where the leak could have occurred and how a similar leak in the future can be prevented. This will be done together with the system management, and any involved external party.

3.6 CONTACT DETAILS

The holder of the membership administration is:

S.G. Daedalus, study association Industrial Design Engineering at the University of Twente

Horst C.008, Postbus 217, 7500 AE Enschede

The Netherlands

The functional management of the membership administration is held by the board of S.G. Daedalus.

The technical management of the website www.sgdaedalus.nl is held by the board of S.G. Daedalus and the website committee.

4 ABBREVIATIONS

S.G.	"Studiegenootschap", also known as study association
GDPR	General Data Protection Regulation
PIA	Privacy Impact Analysis
GMM	General Members Meeting