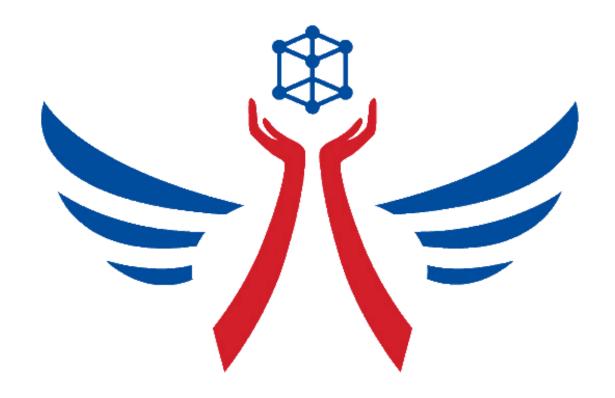
Privacy Policy

Study Association Caerus



Modified Version Published and Approved by the General Assembly-May 10th 2021

Table of Contents

Introduction	4
Definitions	5
Article 1 - Principles Underlying the Processing of Data	7
Article 2 - Data Types and Usage	7
Type 1: Identification Data	7
Type 2: Alumni Data	8
Type 3: Position information	8
Type 4: Caerus Board Election Data	9
Type 5: Non-member Data	9
Type 6: Forms Data	IO
Type 8: Photographic Data	II
Type 10: General Assemblies	II
Article 3 - Data Access and Storage	12
Type 1: Identification Data	12
Type 2: Alumni Data	12
Type 3: Position information	13
Type 4: Caerus Board Election Data	13
Type 5: Non-member Data	13
Type 6: Forms Data	13
Type 7: Financial Data	13
Type 8: Photographic Data	14
Type 9: Event Recording Data	14
Type 10: General Assemblies	14
All types	15
Article 4 - Rights of Caerus Members and Attendees	15
Article 5 - Obligations of Authorised Persons	17
Article 6 - Obligations of all Members	17
Contact details	18

Introduction

The Study Association Caerus, part of the University College Groningen and associated with the Liberal Arts and Sciences programme at Rijksuniversiteit Groningen, henceforth to be referred to as "Caerus", believes that the rights of all members and external participants should be respected, and that if personal information is collected, it must be handled and stored correctly (as explained in Article 2), and discarded safely when it ceases to serve its the original purpose. We take the privacy of our members seriously and therefore the privacy policy is as follows.

Definitions

<u>Caerus:</u> For the instances in which this document refers to "Caerus" as the agent of, for example, storing data, the document means Study Association Caerus as a whole. In such cases it appears inadequate to mention a specific agent, such as the Caerus Board.

<u>Caerus Board positions:</u> The Caerus Board (usually) consists of the following six positions: Chair, Secretary, Treasurer, Committee Affairs Officer, Committee Affairs Officer/UCSRN Representative, External Affairs Officer

<u>Caerus member:</u> Caerus members or simply members as referred to in this document are Caerus members as described in Article 4:1 to 4:3 Statutes.

<u>Committee positions:</u> Committee positions consist of the committee board, meaning Chair, Secretary and Treasurer and general members of a committee.

<u>Congressus:</u> The website manager that Caerus is using. Congressus is the backend of the website and also stores all information about Caerus members.

<u>CUOS:</u> Central Executive Board of Student Organisations

<u>CUOS Audit year:</u> A year in which an association will be re-evaluated by CUOS to determine whether Study Association Caerus should receive funding.

External participants: People that are not members of Caerus and join an event of Caerus

General Data Collection Regulation (GDPR): This is a document created by the European Data Protection Regulation that is applicable as of May 25th, 2018 in all member states of the European Union to harmonise data privacy laws across Europe.

<u>Blackboard Collaborate:</u> The platform that the student portal Nestor uses for online meetings.

<u>Types of data:</u> There are different types of data that this document refers to.

Currently, this document lists 8 (eight) types of data. Each type refers to a different kind of data as each kind is gathered, stored, accessed and removed in different ways.

<u>UCG Caerus course</u>: The Nestor course that has been created specifically for Caerus.

Article 1 - Principles Underlying the Processing of Data

The processing of the data as explained in this document is lawful under Article 6 of the General Data Protection Regulation (GDPR), retrieved on April 2021, for the following reason: "processing is necessary for the performance of a contract to which the member is party or in order to take steps at the request of the data subject prior to entering into a contract". In other words; in order to enjoy all the benefits of being a Caerus member we need to collect the data as described in this document.

Article 2 - Data Types and Usage

The points below outline the **ten (10) types of data** Caerus members and external participants provide Caerus with, and the reasons to do so:

I. Type I: Identification Data

Type I data is data that Caerus needs to collect for the reasons stated below. These data are provided by members upon registration or in subsequent additions or alterations.

- I.I. Name and student number: To identify members and to verify their enrollment to the BSc/BA Liberal Arts and Sciences at the University of Groningen.
- 1.2. Date of birth: To make sure a Caerus member is old enough to attend certain events and to be able to verify the Caerus member's age for the sale of alcoholic beverages.
- 1.3. Email address: To keep Caerus members up to date with announcements and events, as well as for the purpose of general communication,
- 1.4. Phone number (Optional): To contact members in the case of urgent matters, such as a conflict, emergency or last-minute cancellation of events.
- 1.5. Profile picture (Optional): The Caerus website manager, Congressus, gives the option for Caerus members to upload a photo to their account on the

Caerus website.

1.6. Event history: The Caerus website keeps track of every event a Caerus member has signed up for since the start of their membership to keep track of pending payments and document attendance at different Caerus events. In addition, at the end of every year the Caerus Board will create a document that lists all events and the amount of participants, this will be saved in the shared Caerus Board drive for an indefinite period of time.

2. Type 2: Alumni Data

After membership ends, the Caerus Board will store members' information for the reason of contacting members for alumni opportunities on the following terms:

- 2.1. Initial Data: The Caerus Board will continue to hold the initial membership and all connected data in storage on Congressus for the duration of one (1) year after which it will be permanently deleted.
- 2.2. Verification: The Caerus Board will download a spreadsheet from the website that gives an overview of all names of a certain year of graduates to ensure that people can be verified as former members in case they decide to sign-up later than a year after their graduation.
- 2.3. Requesting data storing: Shortly after graduation an email will be sent out to all graduates offering them the possibility to sign-up as Caerus alumni members. The sign up entails the data below and will be permanently stored on the backend of the website. During this period the rights that are laid down in Article 4 withhold. The following will be needed to sign-up:
 - Full Name
 - Email-address
 - Class of [graduation year]

3. Type 3: Position information

Information about positions held within Caerus

3.1. Caerus Board positions: If a member holds a position on the current Caerus Board, their name, photo and description will show up on the Caerus website for the length of their time on the Caerus Board. To enable future Caerus Boards to contact past Caerus Boards, the Caerus Board stores the full name, email address and phone number with relation to this position

- you have held in a contact details document in the shared Caerus Board drive. Photos of past Caerus Boards are available on the Caerus website for an indefinite amount of time, including the names of the Board members.
- 3.2. Committee positions: In case a Caerus member is currently in or has been in any committee board position (Chair, Secretary, Treasurer) or is/was a general member of a Committee, members that are currently in a committee will be listed with their full names on the website. Furthermore, Slash and Pixel will have the names of committee members that uploaded articles or pictures visible on the website next to the piece they uploaded.
- 3.3. Advisory Council: The full names of the current Advisory Council members will be listed on the website.
- 3.4. Other positions within the association: Any other position a Caerus member holds, or has held, within the association; e.g. member of a team, Audit Committee, Independent Body, Election Committee; with their consent, their names and contact details will be written down in a document dedicated to list their contact details for people in their position to contact them in following years.

4. Type 4: Caerus Board Election Data

- 4.1. Application documents: When Caerus members apply for one or more positions of the Caerus Board, they send in their CV, motivation letter and transcript of records. Applicants send these documents to the Election Committee email. These documents are accessible to the Election Committee through their email and their Google Drive where the documents are stored.
- 4.2. Interview documents: Interview schedules, minutes of interviews, minutes of evaluations of interviews are created by the Election Committee and accessible to all Election Committee members on their shared drive.
- 4.3. Voting Results: Documents that show the number of votes a candidate received. are stored on the shared drive of the Election Committee and accessible to the Election Committee members.

5. Type 5: Non-member Data

For administration and security purposes, Caerus needs to collect some data about external participants of Caerus events.

- 5.1. Full name: The organisers of an event need to be able to identify the external participant. This information will be stored as explained in article 1;1.6.
- 5.2. Phone number and/or email: To keep the external participant up to date with announcements about the events that they have registered for and in case of any emergency reasons they need to be contacted for.

6. Type 6: Forms Data

Data that is specifically needed for an event by obtaining information by filling out a form or through other ways of communication with the organisers to provide a service the member has signed up for. This data will only be gathered when deemed necessary to prevent gathering of data without a purpose but simultaneously make the event as enjoyable and safe as possible for participants This may include, but is not limited to, the following data:

- 6.1. Dietary preferences and allergy information for events involving the serving or preparing of food;
- 6.2. Medical conditions, disorders and disabilities to prevent the existence of obstacles or triggers at events; or in case of the existence of certain obstacles and triggers, alert the participant about such;
- 6.3. Date of birth for events involving alcohol (only in case the event is open for non-members as well);
- 6.4. Personal interests or skills, such as hobbies or languages they speak.
- 6.5. Declarations: To allow us to refund you for a purchase you made for a Caerus committee.

7. Type 7: Financial Data

- 7.1. Purchase via website: All details pertaining to the purchase of tickets to events or other items paid for using the website, including membership, will be saved indefinitely. This includes the bank account or card number and the name attached to this that is used to make the purchase.
- 7.2. Declarations: The receipts, your name, the committee name are required when requesting to be reimbursed for money spent on items for Caerus.
- 7.3. Receipts of purchases: All receipts belonging to anything that is purchased for Caerus.
- 7.4. Contracts: All the contracts that Caerus has with committees and external parties will be saved in the Caerus Board Drive.

8. Type 8: Photographic Data

Pictures of Caerus members taken at an event and uploaded to the photo albums on the Caerus website may be used on the homepage of the website or for promotional purposes. In addition, these photos can be used for the Caerus Yearbook. However, before publishing the Caerus Yearbook, an email will be sent out to all Caerus members to inform them that they have the option to choose to remove themselves from the Yearbook (in line with the consent rules stated in Article 2).

9. Type 9: Event Recordings Data

Some Caerus events are recorded, given that all present event attendees agree to the event being recorded. Online events are usually recorded with Blackboard Collaborate. Recordings are stored on Blackboard Collaborate and Google Drive. Depending on the recording, it can be publicly accessible on the Caerus website and/or on Spotify. Events are recorded for the following Reasons:

- 9.1 to enable participants to rewatch such recordings or
- 9.2 to give members that could not attend, the chance to watch the event later
- 9.3 to use the recording for the University College x Caerus Podcast 'LAS Cast'

10. Type 10: General Assemblies

Caerus' General Assemblies are vital in the functioning of Caerus, giving members the opportunity to vote on policies, and share their thoughts and opinions about matters concerning the association.

- 10.1 To record the General Assemblies, the Caerus Board keeps a record of the names of attendees. If a Caerus member speaks during the General Assembly, they say their name before speaking. Their name and comments will be recorded in the General Assembly minutes. These minutes are available on the website and only accessible to Caerus members.
- 10.2 Some General Assemblies might be recorded to facilitate the minute taking process. At the beginning of a recorded General Assembly, the Caerus Chair informs the attendees that this session will be recorded. Everyone who does not agree with that, is asked to leave. The recording platform used for online General Assemblies is Nestor Collaborate. Only people added to the

Nestor Course 'Caerus UCG' have access to the recording. These people are the current Caerus Board as well as the Secretary and the IT Manager of UCG.

Article 3 - Data Access and Storage

The points below outline who has access to your data and how it is stored:

1. Type 1: Identification Data

This information is stored on the website database of Congressus and can be accessed only by members of the Caerus Board* through their accounts that are secured with a password. The password to each account is changed at the beginning of every association year. This minimises the risk of a breach. Information about your event sign-ups may be forwarded to the committee e-mail, but only when the committee inevitably requires the participants' information due to the nature of the committees' initiative or event (e.g. setting up a buddy system). These data are only kept on file up to I (one) year after the person's Caerus membership has ended. After this I (one) year, the data is permanently deleted from the website manager.¹

2. Type 2: Alumni Data

This information is stored on the website database of Congressus and can be accessed only by members of the Caerus Board* through their accounts that are secured with a password. The password to each account is changed at the beginning of every association year. This minimises the risk of a breach. Information about your event sign-ups may be forwarded to the committee e-mail, but only when the committee inevitably requires the participants' information due to the nature of the committees' initiative or event (e.g. setting up a buddy system).

^{&#}x27;If you happen to be a Caerus member during a CUOS Audit year for study associations, your name, student number, date of birth and gender may be submitted to CUOS for verification purposes. More information can be found here: https://www.rug.nl/cuos

3. Type 3: Position information

The data that is publicly available on the website is specified in Article 2;2. All types of Position Information will be found in the GA minutes on the website and in the Caerus Board minutes that can be found in the Caerus Board Drive.

4. Type 4: Caerus Board Election Data

This data is kept on file for the length of the activity of the Election Committee. After the new Caerus Board has officially taken office by having been hammered in, the Election Committee will remove all the data from their shared drive. The Caerus Board will remove all the data from Congressus.

5. Type 5: Non-member Data

This data is stored on the website database of Congressus and can only be accessed by the Caerus Board and Congressus or on request by committee Chairs when needed for the organisation of an event or other initiatives.

6. Type 6: Forms Data

This data is stored on the website database of Congressus and can only be accessed by the Caerus Board and Congressus or on request by committee Chairs when needed for the organisation of an event or other initiatives. The forms will be deleted at the end of a Board year, with the exception of forms that are still needed the next year, e.g. Language Buddy.

7. Type 7: Financial Data

This data will all be stored for an indefinite period of time to ensure the possibility of being able to keep track of all spendings and income over the whole course of the association to prevent any misuse. This data is saved in the service provider, Mollie, our bookkeeping system, Jortt and saved on the online bank statements of Caerus, Triodos Bank online system. This data will not be used for any purpose other than to calculate the income and expenditure of Caerus/a Caerus committee and process refunds. However, as the legal minimum period to store this data is 7 years, a member can request

after this period to use one of the rights stated in article 4.

8. Type 8: Photographic Data

Official Caerus event pictures Pictures (e.g. taken by the photograph committee or a photographer arranged by Caerus) will be placed in the photo albums on the Caerus website and might be used in the yearbook. If the Caerus Board or a committee wishes to use certain pictures for promotional purposes or on the website, they;

- 8.1. Are allowed to do so without explicit consent in case this concerns group pictures or pictures that show the event as a whole. The organizers of an event will inform participants and you can let them know if you don't want to be recognizably shown in public pictures.
- 8.2. Are allowed to use portrait pictures or pictures of small groups only if the person(s) in the picture has/have given explicit consent.

9. Type 9: Event Recording Data

- 9.1. Recordings of Caerus events are stored on Blackboard Collaborate and accessible to all users of the Nestor course "UCG Caerus".
- 9.2. Some recordings are also stored on the Google Drive of a committee and are accessible to all members of the shared Drive.
- 9.3. For recordings of General Assemblies, see Type 10 data.

10. Type 10: General Assemblies

- The General Assembly minutes will be made available to all Caerus members on the website and which will be stored indefinitely. In addition, this will be stored on the Caerus Board Drive.
- 10.2. Voting records are, in principle, anonymous and stored indefinitely. If this is not possible, for example in cases of voting through online forms on the Caerus website, the names attached to votes will be removed after no more than 72 hours, as well as the data that may reside in the back-end of the website. Only the vote tally is kept on record indefinitely. All these data are also stored on the Caerus Board Drive.
- 10.3. Recordings of General Assemblies are automatically saved on the recording platform Nestor Collaborate. As soon as the minutes of the respective General Assembly have been approved by the next General

Assembly, the Caerus Board will permanently delete the recording. When a new Caerus Boards takes office, the previous Caerus Board members add the new Caerus Board members to the course as users. These newly added users will remove the members of the previous Caerus Board from the UCG Caerus course at the beginning of the association year.

11. All types

The Caerus Board makes use of a shared Google Drive and Google Mail in which any of the above mentioned data can be stored. The Drive can, however, only be accessed by the current Caerus Board members through their Board email accounts. The passwords to all the email accounts are changed at the beginning of every association year. The Drive and the Email accounts contain information about Caerus since the funding of the association.

Data from any of the types above can be downloaded by a Caerus Board member and stored on the device no longer than 24 (twenty-four) hours when needed for a certain purpose. After this time period, the data has to be permanently deleted from the device. Furthermore, Caerus Board members can only use their personal device for downloading such data.

Article 4 - Rights of Caerus Members and Attendees

The data subject, in this case, is the individual Caerus member. Each Caerus member may benefit from rights that derive from the GDPR. However, as stated in Article 2 point 7, Caerus needs to hold on to all financial data for a minimum period of 7 years as Caerus legally needs to hold it for documentation purposes. After this period members can make use of the rights below. This does mean that the member will have to terminate their membership if they don't want Caerus to keep their data on file. If a member wants to use any of the rights below, they are asked to contact executive@caerus-ucg.com.

- Right of information (Art. 15 GDPR): You have the right to access and know the personal data that we hold and store about you.
- Right of correction (Art. 16 GDPR) or termination (Art. 17 GDPR): You have the right to correct or terminate any inaccurate personal data that you provided to us.
- Right of limitation of the processing (Art. 18 GDPR): You have the right to limit and to an extent restrict our processing of personal data that you provided to us.
- Right of rejection of the processing (Art. 21 GDPR): You have the right to object/reject our processing or communications of any data that you provided to us.
- Right of withdrawal of permission (Art.7 III GDPR): You have the right of withdrawal of permission.
- Right of data transfer (Art. 20 GDPR): You have the right to receive your personal data that you have provided to the Caerus Board without hindrance.
- Right to complain about how their data was processed (Art. 77 GDPR): You
 have the right to complain about how your data was processed by Caerus to
 the relevant authority

Article 5 - Obligations of Authorised Persons

- 1. Access can be granted to view the personal information of members if
 - 1.1. For actions inherent to membership, such as General Assembly invitations
 - 1.2. For events or services the members signed up to
- 2. Those who have access must act in a responsible manner.
 - 2.1. Authorised persons should not use personal information outside of their tasks within Caerus.
 - 2.2. Authorised persons should not access the information in a way that the system is made vulnerable to unauthorized access, e.g. using public computers.
- 3. The Caerus Board can decide on the revoking of authorisation when

- above-mentioned obligations are not met and can decide to take appropriate action, including, but not limited to, expulsion from the association , internal sanctions or legal action.
- 4. All members of Caerus can ask to revoke the authorisation of the Caerus Board or any Board member through filing an official complaint as explained in The Policy Manual in section 5. The final decision has to be approved by the members during a General Assembly.

Article 6 - Obligations of all Members

Being part of Caerus means that everyone respects each other's privacy and does not share pictures and personal information of other members without their consent.

Contact details

If you have any questions, requests, suggestions or complaints regarding the processing of your personal data or about this policy document, do not hesitate to contact us at executive@caerus-ucg.com or approach a Caerus Board member in person. In addition, you can find procedures for complaints in the Policy Manual Section 5. We hope you enjoyed reading our policy statement, and we wish you a good day!