

Privacy Policy for EVUweb – applicants

Last updated: 7 August 2018

1) Brief presentation of EVUweb

EVUweb is a web application that allows you to register for courses and other events, and to apply for admission to VID Specialized University (VID).

EVUweb is linked to the study administration system known as the Common Student System (FS). This means that any data registered in EVUweb will also be stored in FS. In various contexts, data stored in FS is shared with a number of different parties/institutions. See the privacy policy for FS: <https://www.vid.no/filer/personvernerklaering-for-felles-studentsystem/>

2) What is a privacy policy?

This privacy policy describes how VID processes your personal data in EVUweb. The purpose of this privacy policy is to inform you of the types of personal data processed, how it is processed, who is responsible for the processing, your rights and whom to contact.

3) What is considered personal data?

Personal data is defined as any data, information and assessment that can be linked to you as an individual. The factor that determines whether data is regarded as personal data is whether it can identify a specific person.

Data which, on its own, cannot be linked to an individual, may constitute personal data if it is used in combination with other data.

4) The purpose of and legal basis for the processing of personal data in EVUweb

Purpose

The purpose of processing personal data in EVUweb is to enable you to register for courses/events and apply for admission to study programmes.

Legal basis

In relation to applications for admission to study programmes/courses, the processing is authorized under section 4-15 of the Act relating to Universities and University Colleges and paragraphs 1(e) and 3(b) of article 6 of the GDPR. This mainly applies to study programmes and courses for which admission criteria apply, and where the institution must actively decide which applicants should be offered a place on the study programme/course.

When you register for a course or other event that does not apply admission criteria or rank applicants, the processing is authorized under paragraph 1(b) of article 6 of the GDPR. This means that processing is necessary in order to fulfil a contract concerning courses etc. between you and the institution.

When someone else has registered you for a course or other event on your behalf, such as an employer or organization, we assume that this party has done so in agreement with you. EVUweb does allow for registration on behalf of others (enterprise registration). When you are offered a place on a course pursuant to a contract between the institution and the enterprise, the legal basis for the processing of personal data will be paragraph 1(b) of article 6 of the GDPR. This means that processing is necessary in order to fulfil a contract to which you are a party.

5) Which types of personal data are processed in EVUweb and how long do we store your personal data?

No sensitive personal data about you is currently stored or processed in EVUweb.

We store information about your actions in EVUweb, as well as any error messages related to your actions. This data is erased after a period of 6–12 months.

The following personal data may be processed in EVUweb: profile information (such as your name, national identity number/D number/S number (11 digits), contact details, information about your background, native language), application information, consent you have given, information about application alternatives and documents you upload in connection with your application, admission results and responses to offers of admission to courses or study programmes, and information about whether you have withdrawn your application. If your employer or another organization has been authorized to register applications on your behalf, data about your affiliation with this organization will also be processed.

In certain cases, data related to your activity in EVUweb will be logged with your participant number and, if relevant, your national identity number. This is to enable UNIT to provide you with troubleshooting assistance should the need arise.

Your personal data can be obtained in the ways listed below.

1. By you via EVUweb
2. By a person or organization who has a contract with VID to register applications or course enrolment on your behalf
3. The Common Student System (FS)

Voluntary registration

1. By you via EVUweb

Registration of personal data in EVUweb is voluntary, but without your personal data we may not be able to process your applications.

Information registered without your express consent

2. By a person or organization who has a contract with VID to register applications or course enrolment on your behalf

In some cases, other persons or organizations will be able to register applications or course enrolments on your behalf, for example if you are undertaking a study programme or course through your employer.

3. The Common Student System (FS)

In some cases, case officers at VID need to register information about you in connection with your applications. Examples include assessments related to your application for admission. Actual registration will take place in the study administration system FS, and the outcome is transferred from FS to EVUweb so that you can access your personal data.

6) Automated decision-making

When you use EVUweb at VID to apply for admission to an examination course, many of the steps in the processing of your application will be either fully or partly automated. This applies to:

- calculation of eligibility for courses; and

- registration for courses and examinations.

7) Disclosure of your personal data to third parties

Disclosure or export of data is defined as any transfer of data other than to its own system/processing or to the data subject or someone who receives data on their behalf. VID may disclose or export data that contains personal data to other systems, i.e. to external data processors, when deemed necessary.

Your personal data will not be transferred to countries outside the EU/EEA, or to international organizations.

Your personal data may be disclosed to the following parties/organizations:

- 1) UNIT – the Norwegian Directorate for ICT and Joint Services in Higher Education and Research

EVUweb is developed by UNIT. UNIT staff who need to access your personal data to carry out user support and troubleshooting in EVUweb will be granted such access.

- 2) University Centre for Information Technology (USIT) at the University of Oslo (UiO)

EVUweb is operated by USIT at UiO. USIT staff who need to access your personal data to carry out user support and troubleshooting in EVUweb will be granted such access.

- 3) Other parties

Personal data that you register in EVUweb is transferred to FS. See the privacy policy for FS for more detailed information about who receives personal data from FS:

<https://www.vid.no/filer/personvernerklaering-for-felles-studentsystem/>

8) The security of personal data

VID regularly conducts risk and vulnerability analyses in order to protect your personal data in EVUweb. Various security measures have also been implemented, such as access control to ensure that only employees who require access to your personal data are granted access.

9) Your rights

Right to information and access

You have the right to receive information about how VID processes your personal data. It is the intention of this privacy policy to contain the information you have the right to receive.

You also have the right to view/access all personal data registered about you at VID and to receive a copy of the personal data held on you if you so wish.

Right to rectification

If we hold incorrect personal data on you, you are entitled to have this data rectified. You are also entitled to have supplementary information added to incomplete personal data held on you. If you believe we have registered incorrect or incomplete personal data about you, please contact us. It is important that you state the reason and, if relevant, document why you believe the personal data is incorrect or incomplete.

Right to restriction of processing

In certain cases, you have the right to request that the processing of your personal data is restricted. Restricting the processing of personal data means that your personal data will still be stored, but that the possibilities for further processing will be limited.

If you believe that your personal data is incorrect or incomplete, or if you have lodged an objection to the processing (read more about this below), you have the right to request a temporary restriction on the processing of your personal data. This means that processing will be restricted until, if relevant, we have rectified your personal data, or until we have been able to assess whether your objection is justified.

In other cases, you may also request a more permanent restriction on the processing of your personal data. In order to be entitled to restrict the processing, the conditions in article 18 of the GDPR must be met. If we receive a request from you to restrict the processing of your personal data, we will assess whether the statutory conditions have been met.

Right to erasure

In certain cases, you have the right to request erasure of your personal data. The right to erasure is not unconditional, and whether you are entitled to have your personal data erased must be assessed in light of relevant legislation on the protection of privacy, i.e. the GDPR. Please contact us if you want your personal data to be erased. It is important that you justify why you want the personal data erased, and, if possible, that you also specify which personal data you want erased. We will then consider whether the statutory conditions for erasure have been met. It should be noted that in certain circumstances the law allows for us to make exceptions to your right to erasure. For example, we may need to store personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest, such as archiving, research and statistics.

Right to object

You may have the right to submit an objection to the processing on the grounds that you have a specific need to stop the processing. This includes if you have a need for protection or have a secret address, etc. The right to object is not unconditional, and is contingent upon the legal basis for the processing, and whether you have a specific need. The conditions are stipulated in article 21 of the GDPR. If you submit an objection to the processing of your personal data, we will consider whether the conditions for submitting an objection have been met. If we find that you have the right to object to the processing and that your objection is justified, we will discontinue processing, and you will have the right to request erasure of the data. It should be noted that we may under certain circumstances make exceptions from erasure, for example if we have to store your personal data for the purpose of performing a task in compliance of the Act relating to Universities and University Colleges, or for reasons of public interest.

Right to lodge a complaint about the processing

If you believe we have not processed your personal data in a correct and lawful manner, or if you believe that we have failed to protect your rights, you have the right to lodge a complaint about the processing. You can find information about how to contact us in section 10.

If we dismiss your complaint, you can appeal to the Norwegian Data Protection Authority (DPA). The DPA is responsible for ensuring that Norwegian organizations comply with the Personal Data Act and the GDPR in the processing of personal data.

10) Contact information

Data controller

VID is the data controller of personal data in EVUweb, see section 2 (4) of the Personal Data Act.

If you wish to exercise your rights as described in section 9 above, you can contact us at post@vid.no. We will process your request without undue delay, and within 30 days.

Data protection officer

VID has appointed a data protection officer who is responsible for protecting the personal data interests of students and employees at VID. The data protection officer for administrative processing of personal data at VID can be contacted by e-mail: personvernombud@vid.no (appointed on 1 September 2018).

Service provider

UNIT – the Norwegian Directorate for ICT and Joint Services in Higher Education and Research is the EVUweb supplier. This means that UNIT develops and maintains EVUweb and is responsible for the day-to-day operation of EVUweb. Through this work, a select few staff at UNIT have access to all personal data registered in EVUweb, including personal data that is transferred to and from FS.

E-mail address for UNIT: postmottak@unit.no