Privacy Policy for Mobility Online

Last updated: 24 October 2018

1) Brief presentation of Mobility Online

Mobility Online is a web application in which students and staff at VID Specialized University (VID) can apply for exchanges abroad, and where students and staff from external institutions can apply for short-term exchanges at VID.

Data concerning studies abroad for VID students and students from external institutions seeking to be admitted as an exchange student at VID is linked to the study administration system known as the Common Student System (FS). This means that any data registered in Mobility Online 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.

2) About this privacy policy

This privacy policy describes how VID processes your personal data in Mobility Online. 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, see section 2 (1) of the Personal Data Act. 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 processing personal data in Mobility Online Purpose

The purpose of processing personal data in Mobility Online is to be able to identify students and staff seeking an exchange placement to or from VID.

Furthermore, the purpose of processing personal data in Mobility Online is to be able to register that a student or member of staff has applied for an exchange, as well as to identify the student or employee. Identification of the student is necessary both to enable VID to process the exchange application and for the relevant external institution to receive information about the student or employee submitting the application.

Legal basis

Mobility Online is subject to the provisions of the Personal Data Act and the Personal Data Regulations. The legal basis for processing personal data in Mobility Online is regulated in the contract between you, as a student/employee, and VID.

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

No sensitive personal data is stored in Mobility Online.

When you log in to Mobility Online, we store your e-mail address and the time you logged in. This information is stored in order to provide assistance in connection with your use of Mobility Online should the need arise. Your name, date of birth and address are stored in the application you register in Mobility Online. For students who are granted a study period abroad, information about insurance, passport number and bank account number will also be required. This is necessary in order to pay out any grants, and to enable VID to assist with visa applications where applicable.

Personal data related to your logins will be stored for 20 months before being erased.

Personal data relating to students who are granted a study period abroad or who are admitted as an exchange student at VID is forwarded to FS.

6) Automated decision-making

Your personal data in Mobility Online will not be subjected to automated decision-making or profiling.

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. Mobility Online may disclose or export data that contains personal data to other systems, i.e. to external data processors, when deemed necessary.

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

Information on exchanges for students and staff at VID who are awarded funding (a grant) from the EU through the EU Erasmus+ programme, is registered and reported in the EU's own system: Mobility Tool. Names and e-mail addresses are registered here, and Mobility Tool will use this information to contact you once you have completed the exchange in order to request a report in accordance with the grant agreement.

For some study programmes, VID will use Atlantis Exchange and Kilroy in connection with work experience programmes abroad. Data such as names, dates of birth and addresses will therefore be forwarded to these platforms. Atlantis and Kilroy will use the information to arrange work experience placements with the relevant employers abroad. Both Atlantis and Kilroy have their own privacy policies.

8) The security of personal data

VID regularly conducts risk and vulnerability analyses in order to protect your personal data in Mobility Online. 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 the Personal Data Act and 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 Personal Data Act and 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 11.

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 Mobility Online, 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

SOP Hilmbauer & Mauberger GmbH & Co KG is the supplier of Mobility Online. This means that they develop and maintain Mobility Online and are responsible for the day-to-day operation of Mobility Online. Through this work, a select few staff at SOP Hilmbauer & Mauberger GmbH & Co KG have access to all personal data registered in Mobility Online.

Contact information for SOP Hilmbauer & Mauberger GmbH & Co KG: Schönbrunner Straße 297/1/4/2, 1120 Vienna, Austria. FN 244905f, HG St. Pölten, UID: ATU57748628 Tel.: +43 (0) 50 529 43.