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PRIVACY DOCUMENT

STUDY ASSOCIATION KOMMA

Study Association Komma, located at

Ravelijn, Room 1324
De Zul 10
7522 NJ Enschede
Netherlands

is responsible for the processing of personal data from www.komma.utwente.nl as shown in this privacy statement

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1. Introduction

This document describes how the data processing by Study Association Komma takes place. The data processing includes all the personal data of the members of Study Association Komma. The personal data are stored in the membership database, and are processed by the board members of Study Association Komma.

2. Description of the data processing

Study Association Komma processes personal data because members use their services and / or because they provide this information to the Study Association Komma.

2.1 Basis

The processing of the members' data is lawful, based on the following basis:

Article 6, paragraph 1a of the GDPR, a member of Study Association Komma grants access to data processing manager Study Association Komma for the processing of members administration.

2.2 Involved data

2.2.1 Data from an external source

Study Association Komma does not use data from external sources. All available personal data are provided by the members themselves, and with the exception of the obligatory data, they themselves determine what information they provide.

2.2.2 Personal Data

Below you can find an overview of the personal data that Study Association Komma processes of its members. They are provided with a brief explanation.

- First and last name (Required)
 - o To identify a member, their first and last name is required. Identification is for example required for book sales, mailing, participation in activities and direct debits.
- Initials
 - o The initials are required to identify a member. The initials must be kept for the tax authorities (Belastingdienst).
- Student number (Required)
 - o The student number is used to confirm that the member is studying at the University of Twente. In addition, the student number is the same as the member's login name, and is used to confirm direct debits.
- Gender (Required)
 - o For the completeness of the member administration and the identification of the member, it is important to know the gender of the member.

- Date of birth
 - o The birth date of a member is necessary to know if a member can participate in an alcohol-related activity, but also to know whether the member is 16 years or older. More information about this can be found in article 2.3.
- Address data
 - o Address data are required for communication by mail. For example, the Christmas card for active members, but also communication with former board members.
- Photo
 - o A photo can be added by the member to complete his account. This is displayed on the account of the member, but also in the online almanac or with comments.
- Mobile phone number
 - o The phone number of a member is used to contact the member for such purposes as: providing information about activities, reminder when not responding to e-mail.
- E-mail address (Required)
 - o The e-mail address is required as the primary means of communication. Information about activities, direct debits, the monthly newsletter, invitations to GMA's and general communication is done via email.
- IBAN / Account number (Required)
 - o The IBAN number is required for direct debits, such as the annual membership fee and participants' contributions for activities.
- BIC (Required for international members)
 - o In order to be able to make direct debits with foreign members, it is necessary to have the BIC number of them. In this way they can also be a full member of the Study Association Komma.
- Nationality (Required)
 - o To make the communication to the member as optimal as possible, it is important to know whether the member is of Dutch or from international origin. This will also be used to understand more about the members and ensure Komma's service is as optimal as possible.
- Signature of the member (Required)
 - o The member's signature must have been set to the 'Mandate for recurrent collections'. This file must be provided with a signature before the membership is activated.

- Whether or not agreeing with the online conditions of membership of Study Association Komma (Required)
 - o The member must agree with the online conditions of Study Association Komma. This is mandatory, if a member does not agree with this, it will not be possible to become a member.
- Whether or not the member's details are visible in the online almanac, more specifically the visibility of address data, telephone number(s), e-mail address (s), date of birth and / or other information.
 - o For details listed above, it is possible to give permission for publication thereof. Other logged in members then have access to this data.
- Whether or not willing to receive mailing
 - o A member can choose whether or not he / she wants to receive mail. This concerns mailing besides the newsletter.
- Whether or not willing to receive confirmations of participation in events
 - o A member can choose whether or not he / she wants to receive mail about activities for which he is registered. This concerns mailing such as a registration confirmation, unsubscribe confirmation or mailing about adjustments of the activity.
- Whether or not to receive notifications regarding comments that the member has written
 - o A member can choose whether or not he / she wants to receive mail regarding comments the member has placed on the website. When someone responds to this, the member can receive a notification of this via email, if required.
- In which 'group(s)' a member is.
 - o Members can be placed in groups, so that communication is easier. Think of groups such as in which board or committee the member has been. Information from groups is visible to all members in this group.
- In which activities a member was and will be present
 - o The activities overview keeps track of what activities a member has participated in. This information is used to draw up direct debits, but also to collect feedback about this activity. Both directors and members themselves have access to this.

- Which mailing a member has received
 - o Komma keeps track of which e-mailing a member has received. This information is very valuable to the board, so it is clear to them whether the member is aware of activities and whether they have read the e-mail.

The personal details as mentioned above belong to the members of Study Association Komma, in other words, persons who have become members either through a paper membership form or the online membership form. If 'Required' has been added, this means that the data must be filled in. If not required, a member is free to add / accept it or to omit it / not to accept it.

2.3 Special and / or sensitive data

The website of Study Association Komma does not intend to collect data of website visitors who are younger than 16 years old. Unless they have permission from parents or guardians. However, Study Association Komma cannot check whether a visitor is older than 16 years old. Parents are therefore advised to be involved in the online activities of their children, in order to prevent data about children being collected without parental consent. If you are convinced that Study Association Komma has collected personal information about a minor without this permission, please contact secretary@komma.utwente.nl, this information will be deleted.

3. Privacy related law

Study Association Komma determines the purpose of the processing of personal data. That makes Study Association Komma the processing responsible. Personal data will only be processed by Study Association Komma, more specifically by the board of the study association, as appointed during a General Members Meeting. Board members of Study Association Komma are responsible for the personal details of members and are the only ones who have access to them.

3.1 Processing goals

Study Association Komma processes personal data for the following purposes:

Goal	Example(s)	Personal data
Financial settlement	<ul style="list-style-type: none"> - Collect membership fee - Collect activity contribution - Transfer declarations by members 	<ul style="list-style-type: none"> - Bank account number - First and last name - Email address - Student number
Sending of the monthly newsletter	Does not apply	<ul style="list-style-type: none"> - First and last name - Email address - Whether or not willing to receive the newsletter
Communication to members	<ul style="list-style-type: none"> - Calling / texting / WhatsApping / e-mailing regarding activities 	<ul style="list-style-type: none"> - First and last name - Email address - Phone number
	<ul style="list-style-type: none"> - Calling / texting / WhatsApping / e-mailing to be able to perform our services 	<ul style="list-style-type: none"> - Whether or not willing to receive emails

(the possibility of) creating an account	<ul style="list-style-type: none"> - Register for activities - Find summaries - Access to photos of activities 	<ul style="list-style-type: none"> - Student number - First and last name - Gender - Email address - Bank account number
(the possibility of) purchasing study books with a discount	Will be added once contact has been made with Study Store	
To act as optimally as possible to the member's personal preferences	<ul style="list-style-type: none"> - Communicate to members as efficiently as possible 	<ul style="list-style-type: none"> - Whether or not willing to receive e-mailing - Whether or not willing to receive confirmations of participation in events - Whether or not willing to receive notifications about comments that a member has written - In which 'group(s)' a member is placed - In which activities a member participated and will participate in - Which mailing a member has received - The status of the member (candidate member etc)

3.2 Automated decision-making

Study Association Komma does not make decisions based on automated processing on matters that can have (significant) consequences for individuals. This concerns decisions taken by computer programs or systems, without involving a person (for example, a board member of Study Association Komma).

4. Storage of personal data

Study Association Komma does not store personal data for longer than is strictly necessary to achieve the goals for which the data are collected. Study Association Komma uses the following retention periods for the following personal data:

4.1 Retention Periods

Goal	Data	Storage period	Manner of storage
Financial Settlement	<ul style="list-style-type: none"> - Bank account number - First and last name - Emailaddress - Student number 	For the sake of the tax authorities, these data are retained for 7 years, see article 4.1.1	The finances of Study Association Komma are processed in Informer (article 4.2.4).

	of another study association		<p>There is also a (monthly) backup, this file is stored on a USB stick and stored in the vault of Komma. Only the treasurer has access to this.</p> <p>Declaration forms, which contain name, bank account number and email address, are stored in a closed cupboard in the association room, which only board members have access to.</p>
Sending of the newsletter	<ul style="list-style-type: none"> - First and last name - Emailaddress - Whether or not willing to receive the newsletter 	Up to 1 month after sending newsletter. This is to gain insight into the behavior of members	<p>Recipient list is compiled in Excel based on the current member database and stored on a PC of the board. This list will be deleted after sending the newsletter.</p> <p>This list is imported into Mailchimp (see 4.2.2). After a month, the recipient list is removed from MailChimp.</p>
Communication to members	<ul style="list-style-type: none"> - First and last name - Email address - Phone number - Whether or not willing to receive emails 	<p>Up to 11 months after termination of membership. A member has the right to continue the benefits from a membership at study association Komma after terminating membership until the end of the academic year. However, mailing to logged-out members will stop immediately.</p> <p>Communication to members will also stop if a member specifically requests this or if he / she indicates this online. This can be done at any time.</p>	<p>All members' data will be retained until the end of the academic year after deregistration. These are stored in the members database of Congressus (see 4.2.1).</p> <p>Data on paper is also retained on the 'Mandate for recurrent collections'. These signed forms are stored in a closed cupboard in the club room that only drivers have access to. These forms will be destroyed upon cancellation of the membership.</p> <p>If a member indicates that he no longer wishes to receive a mailing, the member's details are retained as described above.</p>
(the possibility of) creating an account	<ul style="list-style-type: none"> - Student number - First and last name - Gender 	<p>See above</p> <p>Once a month a backup is made of the</p>	<p>See above</p> <p>This backup consists of an Excel file with all the data of all</p>

	<ul style="list-style-type: none"> - Email address - Bank account number 	<p>member administration. This replaces the version of the previous month. This file contains all the details of the member. This is done to prevent losing the entire administration in the event of a crash in the members database.</p>	<p>members in it. This file is stored on the PC of the board, which only the board members have access to.</p>
(the possibility of) purchasing study books with a discount	Will be added as soon as Study Store replies		
To act as optimally as possible to the member's personal preferences	Various preferences in the member's personal account	See 'Communication to members' and '(the possibility of) creating an account'	See 'Communication to members' and '(the possibility of) creating an account'

4.1.1 Tax authorities laws

The finances of Study Association Komma are kept in an accounting program. Both the general ledgers and the debtors / creditors administration must be retained for 7 years, as included in the tax legislation. Personal data that can be found here are:

- Bank account number
- Name
- E-mail address
- Student number

The ledgers and debtors / creditors administration must be available on paper as well as digitally. Study Association Komma is open to the tax authorities and will fully commit to meeting the requirements and conditions of the tax authorities at all times.

Personal data of users will be deleted upon request.

4.2 Sharing of personal data with third parties

Study Association Komma provides data only to third parties if this is necessary for the implementation of the agreement with members or to comply with a legal obligation.

4.2.1 Congressus

All personal data is stored via the Congressus member system. Congressus is a processor of the personal data of Study Association Komma. Details about the data processing by Congressus can be found in the processor agreement between

Congressus and Study Association Komma.

4.2.2 MailChimp

Newsletters from Study Association Komma are sent with the services of MailChimp. MailChimp is a processor of the personal information of Study Association Komma. Details about the data processing by MailChimp can be found in the Privacy Statement and the Terms of Use document of MailChimp.

4.2.3 ING

Payments and direct debits with members of the Study Association Komma are processed by ING. ING is a processor of the personal data of Study Association Komma. Details about the data processing by ING can be found in the Code of Conduct for the Processing of Personal Data of ING.

4.2.4 Studystore

One of the services of Study Association Komma is the sale of study books. This is done via an external party, namely Studystore. Studystore collects student numbers in order to give a discount to members of the Study Association Komma. Details about the data processing by Studystore can be found in: *Waiting for response from Studystore*.

4.2.5 Google Drive

The daily actions of the Study Association Komma, and the personal data used (e.g. mailing lists, membership records, commission reviews, etc.) are stored in the cloud via Google Drive. Google Drive does not process this data, but only stores it. More information about Google Drive can be found in their Privacy Policy and Terms of Service on their website. Study Association Komma will not store files with personal data of members for longer than necessary for the functioning of the association, as described in article 4.1.

4.2.6 Others

It is possible that Study Association Komma occasionally shares personal data with external companies. Think of situations such as the annual study trip,, or requesting personal data from the University of Twente. In these cases, members' information is shared, and the board of Study Association Komma will focus to it that this is done strictly for the necessary purposes only. It is not possible to make general policy for this, because every situation is different. We will look at how this can be done as safely as possible for each situation.

5. Cookies, or comparable techniques, that we use

Study Association Komma only uses functional cookies. And analytical cookies that do not infringe privacy. A cookie is a small text file that is stored on the computer, tablet or smartphone during the first visit to this website. The cookies that Study Association Komma uses are necessary for the technical functioning of the website and the ease of use. They ensure that the website works properly and remember, for example, preferences. Study Association Komma can also optimize the website. A member can opt out of cookies by setting up the internet browser in such a way that it does not store cookies anymore. In addition, all information previously stored via the settings of the browser can also be removed.

6. See, change or remove personal data

A member has the right to view, correct or delete personal data. You can do this yourself through the personal settings of your account. In addition, a member has the right to withdraw any consent to the data processing or to object to the processing of personal data by Study Association Komma and they have the right to data portability. This means that members can submit a request to send the personal data that are available to them in a computer file to the member.

6.1 Rights of involved people

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

6.1.1 Right of access by the data subject (article 15)

A member is entitled at any time to inspect according to article 15 of the AVG. Access to the data and processing purposes can be obtained by submitting a written request to the board of Study Association Komma. The board will then provide this inspection as necessary as possible.

6.1.2 Right to rectification (article 16)

According to Article 16 of the AVG, a member has the right to rectification of incorrect personal data. A member can change personal details in the membership admitting via the website of the Study Association Komma.

6.1.3 Right to erasure (Right to be forgotten) (article 17)

If a data subject wishes to have his or her data erased, a request can be submitted to the board of Study Association Komma. This will then prepare the data for removal. Unlike in Article 4.1, a member is immediately removed from the system in this case.

The member can then no longer make use of the facilities offered by the Study Association Komma, and can therefore no longer log in to his account. When Study Association Komma no longer has data from a member, this member is no longer a member.

6.1.4 Right to restriction of processing (article 18)

If a data subject wishes to limit his or her data processing, a written request can be submitted to the board of the Study Association Komma. The board of the Study Association Komma will then delete the desired data from the membership administration. A member can also delete a number of data from the membership records himself. All data can be removed from the membership records, with the exception of the mandatory data as described in 2.2.2. If a member wants one of the data to be removed from the membership administration, the membership will have to be terminated.

6.1.5 Notification obligation regarding rectification or erasure of personal data or restriction of processing (article 19)

If rectification, erasure 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.

6.1.6 Right to data portability (article 20)

The person concerned can request his details on the website of the Study Association Komma. Here all

data is visible which can be processed. In addition, an Excel file of all data known to Study Association Komma can be requested from the board of Study Association Komma.

6.1.7 Right to object (article 21)

The person concerned can raise the objection of processing to the board of Study Association Komma. Subsequently, the processing of data entered by the data subject will be stopped. If the person concerned raises objections to processing concerning the mandatory data mentioned above, this will amount to termination of the membership

6.1.8 Automated individual decision-making, including profiling (article 22)

As already mentioned in 3.2, study association Komma makes no use of automated decision-making in any way. With every processing operation there is human input.

6.2 Contact in response to the rights

If a member wishes to make use of his right to objection and / or right to data portability, or if the member has other questions / comments about the data processing, he can send a specified request to secretaris@komma-ut.nl

Study Association Komma also wishes to point out to members that they have the opportunity to submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. This can be done via the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>

7. How we protect personal data

Study Association Komma takes the protection of data seriously and takes appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification.

7.1 Dataleaks

When a data breach takes place, the board of Study Association Komma will inform the relevant members as soon as possible of the leak. The board of Study Association Komma will make every effort to limit the consequences of the data breach as well as possible and (if necessary in cooperation with system management and external parties) to map out how the data breach has taken place, and how this can be done and how in the future this can be prevented.