



College of Europe
Collège d'Europe



Privacy Notice for Students

College of Europe – Bruges Campus

Purpose of this Notice

The College of Europe, Bruges Campus ("We", "us", "our", "College") is committed to protect your privacy.

"You" and "your" refers to those expressing an interest in becoming a student at the College (both prior to and at formal application stage), together with those who later become a registered student at the College.

This notice explains how we will collect and use your personal data in accordance with the GDPR¹.

Where does the College get your personal data from?

We obtain personal data about you from the following sources:

- from you when you show the intention to become a student with us or register as a student;
- from you when you register at specific applicant recruitment activities such as academic fairs;
- from third party sources (e.g. other institutions involved in joint programmes). When we obtain personal data about you from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

Categories of personal data being processed

We will collect and process personal data about you for the purposes described below.

Personal data may contain "special categories of data" as described under the GDPR. Such or "special categories of data" will include information about your racial or ethnic origin, religious beliefs or other beliefs, physical or mental health or information concerning any criminal offences or criminal proceedings.

When you register with us as an applicant or student you can share certain types of "special categories of data" with the College if necessary.

The purposes for which we process your personal data and the legal basis for that processing

In general terms, we process your personal data for the administration of your position as an applicant or student with us, including the use of our services such as, residential services, lecture capture, attendance monitoring, the Library and all other services directly and indirectly necessary.

The various legal bases to process this data are the necessity for the performance of your student contract, legal obligations, legitimate interest and consent in specific cases.

¹ Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p. 1)

You can contact the Privacy Office for more detailed information.

Who might we share your data with?

The College will occasionally share your personal data with third parties. For example we may share some of your data with specific government bodies, specific selection committees or other third parties involved in the delivery of your course (such as but not limited to a guest lecturer). We also might share your data with accrediting and professional bodies.

Additional notices and guidance/policies

We also have some additional notices, guidelines and policies with further useful information about the way we process your personal data:

- The College's Data Protection Code of Practice.
- Attendance monitoring – we conduct attendance monitoring for a number of reasons including to assist with students needing a visa for students and ensure the proper engagement of our students.
- Lecture capture or streaming services – we record from time to time educational and comparable activities in which you may be involved. We do not permit students to record education activities unless prior written approval.
- Pictures can be taken during courses and events specifically but also on the College premises in general. These pictures will be stored on college systems and can be used for publication in brochures, adverts and alike on paper and on the web. If you do not want to feature on such pictures, please make sure you inform us about this.
- Our Alumni – Our alumni community is an integral part of the College life. The Alumni Relation office of the College provides the necessary services for alumni activities. The activities themselves are organised by the College of Europe Alumni Association. For more information on their activities and their privacy notices, please see <https://collegeofeurope.hivebrite.com/>.
- Our website – we use Cookies (that will collect your personal data) on our web pages. Please see our policy on the use of Cookies at <https://www.coleurope.eu/privacy-policy-web>.

Unwanted communication

We will from time to time communicate with you by email, post and telephone.

If, at any stage, you are concerned about these communications, e.g. unwanted marketing information, or wish to change the method of communication that we use please unsubscribe to general email communications.

If you are unsuccessful in unsubscribing from our communications and/or remain concerned, please contact the College's Privacy Office.

Transfers to third party countries

Sometimes to achieve the purposes for which we are processing your personal data we may need to share your personal data with other organisations based within the European Economic Area (EEA) or if outside the EEA based in countries that have adequate levels of protection.

When it is necessary to share your data with organisations outside the EEA, we will ensure that there are appropriate safeguards in place.

Retention periods

The College uses different retention guidelines depending on the type of data. In general the data will no longer be processed then necessary.

You can contact the College's Privacy Office for more detailed information.

Your rights as an individual

We thought it would be helpful to set out your rights under GDPR. You have the right to:

- withdraw consent where that is the legal basis of our processing;
- access your personal data that we process;
- rectify inaccuracies in personal data that we hold about you;
- be forgotten, that is your details to be removed from systems that we use to process your personal data unless there are legal grounds not to do so;
- restrict the processing in certain ways;
- obtain a copy of your data in a commonly used electronic form (data portability); and
- object certain processing of your personal data by us.

Please see <https://www.privacycommission.be> for further information on the above rights. You may also contact the Privacy Office for further information.

You have a right to complain to the local Data Protection Authority - in the College's case this is the Belgian Data Protection Authority - about the way we process your personal data. Please see <https://www.dataprotectionauthority.be>.

Legal bases for processing your data under GDPR

The GDPR is new law. As legal views mature the College may change its views on its legal basis for processing.

Here is a brief explanation of the grounds under the GDPR we consider as legal basis for processing personal data.

- (Article 6(1)(a)), Consent
On specific occasions the College will only process certain data if you consent e.g. on registration you only need to provide certain "special categories" of data if you agree with that.
- (Article 6 (1)(b)), necessary for the performance of your student contract.
On many occasions the College will process your data to enable it to meet its commitments to you e.g. those relating to teaching and assessment.
- (Article 6 (1)(c)), necessary to comply with a legal obligation.
The College does have legal obligations to provide your personal data to others (e.g. the City of Bruges in relation to your residence permit).
- (Article 6 (1)(d)), for the purpose of protecting the vital interest of yourself or another.
Sometimes and only in extreme circumstances the College will have to release information to protect your interests or the interests of others e.g. in medical emergencies.
- (Article 6 (1)(e)), processing necessary for the performance of a task carried in the public interest.
The College is an educational establishment and in particular its educational activity is conducted in a public interest (including your interest and the interest of others).

- (Article 6 (1)(f)), processing is necessary for the purposes of the legitimate interest of the College or a third party subject to overridden interests of the data subject.
The College (and sometimes third parties) has a broad legitimate interest in activities that connect to the activities and education of students. Subject to those interests not being overridden by the interests of fundamental rights and freedoms of students, it will pursue those interests. A good example of this legitimate interest would be its Alumni activities. Where Article 6(1)(f) is used the “legitimate interest” is generally the interest of the College (or third party) in providing or supporting the provision of higher education to its students.
- (Article 22(2)(a)), automated decision-making necessary for performance of a contract.
The College will sometimes automate decisions relating to its services it is providing to you.
- (Article 9(1)(a)), processing “special categories” of data where you have given consent.
The College will process certain sensitive information about you with your consent.
- (Article 9(1)(g)), processing “special categories” of data where necessary for reasons of substantial public interest.
- (Article 9(1)(f)), processing “special categories” of data in connection with legal claims.
It is recognised that some of the above grounds will overlap and that the College could rely on multiple grounds justifying its lawful processing. The College also reserves the right to rely upon other grounds.

Anything you are not clear about

If there is anything you are unclear about, please contact our Privacy Office, who shall be happy to answer any queries you may have concerning this Notice or the way in which we process your personal data.

Concerns and contact details

If you have any concerns with regard to the way your personal data is being processed or have a query with regard to this Notice, please contact our Privacy Office.

- By e-mail: privacy_office.be@coleurope.eu.
- By post: Privacy Office; College of Europe, Bruges Campus; Dijver 11; 8000 Brugge; Belgium
- By phone: +32 50 47 71 11.
- In person is also possible after an appointment is set.

Changes to this Notice

We are likely to make changes to this Notice. We shall inform you of any changes to this Notice. Notification will be through the appropriate medium of communication e.g. where our main contact with you is by email we will email you.

You can obtain the current version of this Notice from our website at www.coleurope.eu/privacy.