



College of Europe
Collège d'Europe



Privacy Notice for Students

College of Europe
Bruges & NatolinCampus

Purpose of this Notice

The College of Europe, Bruges & Natolin 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 "special categories of personal data" will include information about your racial or ethnic origin, political opinions, religious beliefs or philosophical beliefs, trade union membership, processing of genetic data, biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation.

When you register with us as an applicant or student, you can share certain types of "special categories of data" with the College if deemed 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 academic services, residential

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)

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.

You can contact the Privacy Office for more detailed information.

Who might we share your data with or transfer data to?

The College can share your data with or transfer your data to third parties only if there is a valid legal basis to do so. 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) or partners such as the Alumni Association. 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 internal rules, regulations and guidelines.
- Attendance monitoring – we conduct attendance monitoring for a number of reasons including to assist with students needing a visa.
- Lecture capture or streaming services – we can record educational and comparable activities in which you may be involved.
- (Live) Online remote oral exams using web conferencing & recordings – the recordings will be kept on record for 3 years after the end of the current academic year, until the time for an appeal procedure according to the College of Europe's Study Regulation has passed.
- Mock-up or take-home exams – technical log files of the various systems processed during the (remote) online exams can be used by the College's ICT Service to track student performance, only for security reasons, technical problems, verification of the integrity of an exam situation or suspicion of exam fraud. A relevant part of the logs will be kept on record for 3 years after the end of the current academic year, until the time for an appeal procedure according to the College of Europe's Study Regulation has passed. 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/>.

Unwanted communication

We can 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

To achieve the purposes for which we are processing your personal data we may sometimes 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 or for which the College has an appropriate agreement to do so.

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 periods depending on the type of data. In general these data will no longer be processed than 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 consult the webpage of the Belgian Data Protection Authority (<https://www.dataprotectionauthority.be>) or the Polish Data Protection Authority (<https://uodo.gov.pl>), 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 about the way we process your personal data. For the Bruges Campus, please see <https://www.dataprotectionauthority.be>. For the Natolin Campus, please see <https://uodo.gov.pl>.

Legal bases for processing your data under GDPR

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 personal data if you.
- (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 the 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 the performance of a contract.
The College can 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 recognized 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.

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.

Bruges Campus

- By e-mail: mailto: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.

Natolin Campus

- By e-mail: <mailto:iodo.pl@coleurope.eu>
- By post:
Privacy Office; College of Europe, Natolin Campus;
Nowoursynowska 84; 02-797 Warsaw, Poland
- By phone: +48 22 54 59 780

Changes to this Notice

We are likely to make changes to this Notice.

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