



Purpose of this Notice

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

"You" and "your" refers to those expressing an interest in becoming a student at the College (both prior to and at the 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 you when you participate in an online remote oral exam using web conferencing;
- from you if necessary for reasons of public interest in the area of public health;
- from third party sources including, for example:
 - other institutions involved in joint programs;
 - funding and sponsorship partners;
 - educational institutions, examination boards;
 - government departments
 - employers who may provide a reference about you or sponsor your studies.

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.

- During events managed by the College where photographs, audio and video recordings of you may be taken. For more information on this, please see our Privacy notice for Events at: https://www.coleurope.eu/sites/default/files/uploads/page/privacy_policy_events.pdf

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)

Categories of personal data being processed

We will collect and process personal data about you for the purposes described below. The types of information collected and processed by us may include, but are not limited to, the following:

- Biographical and Contact Details such as name, student ID number, gender, address, date of birth, country of birth, telephone number, email, citizenship
- Academic information and employment history such as academic history, academic grades, relevant work experience, exam scripts, continuous assessments, library information. We will also keep records relating to assessments of your work, details of examinations taken, qualifications, your predicted and actual examination grades and other information in your student record.
- Financial information such as bank details, details of funding and fees.
- Any records relating to student policies and procedure cases e.g. malpractice, disciplinary actions;
- Visa and immigration information, including visa and passport details.
- Your student number and other examples of unique system. E.g. C-Card and C-Account
- Information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate.

The personal data that we process may in some specific cases contain “special categories of data” or “sensitive data” as described under the GDPR. Such “special categories of data” could include information about your physical or mental health, racial or ethnic origin, religious beliefs or other beliefs.

In case of a public health emergency, we can also acquire additional data about your health and whereabouts. 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, digital services 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.

Personal information is needed to provide you with the following services and to undertake the following activities:

- Recruitment, application, admissions, and enrolment purposes and to provide you with information about ICT and other support services;
- Making and keeping student records on central systems, maintaining your student record and managing academic processes;
- Educational, assessment and training purposes, including providing you with technology which assists you to undertake and manage your studies, and assessment and to record and reflect on your learning;
- Support purposes, including the provision of advice and support to you, academic services, welfare including counselling and pastoral services, academic support, support with your Immigration process, health care services, health and safety, attendance monitoring, vacancy information and careers guidance, where you need or choose to access these services;
- Managing college services including ICT services, library services and events;
- Administering financial matters. This includes your liability for scholarships, fees, payment of student fees;
- Communication purposes including email, text messages and other electronic communications;
- Undertaking enquiries and investigations in relation to complaints, student conduct, fitness to study, academic appeals and any other enquiries and investigations in line with College policies;
- For the purposes of ensuring that our College community remains safe and inclusive, including the management of behavioural or disciplinary;
- Contacting your emergency contacts;
- Confirmation of awards;
- Where you provide written consent, providing references to future employers or Further or Higher Education Institutes;
- Statistical and archival purposes.

You can contact the Privacy Office for more detailed information.

Who might we share your data with?

In order to perform our legal responsibilities, contractual and other purposes set out above, the College will occasionally share your personal data with third parties; these may include, but are not limited to the following:

- specific government bodies;
- specific selection committees;
- third parties involved in the delivery of your course (such as but not limited to a guest lecturer);
- accrediting and professional bodies;
- to your funders and sponsors and grant funding bodies;
- to your employer if you are part of an apprenticeship program. E.g. disclosure of attendance, conduct and progress information;
- to other educational institutions which the University partners with in order to provide our teaching and educational services to you, to deliver placements, and to deliver joint or dual, and franchised or validated awards;
- to external examiners for the purpose of assessment;

- to agents assisting the College with international admissions (limited to what is strictly necessary for the performance of the agent's role) - this may include the disclosure of personal data outside the European Economic Area;
- governmental bodies where pursuant to the investigation of crime, national security, immigration, tax and benefit matters;
- to our alumni association;
- to printing, mailing and marketing agencies who assist us, under contract, to communicate with you;
- to your trusted / emergency contact and the emergency services in respect of emergency situations. e.g. where your physical or mental health or wellbeing, or safety is at risk;
- to potential employers and other educational institutions requesting a reference for a current or past student. This includes confirmation of awards;
- to our ICT providers supplying, supporting and hosting our ICT services, and other data processors acting on behalf of the College;
- to local authorities in relation to council tax exemption, administration of housing benefit and for processing care leaver bursaries;
- to our banking and online payment processing service suppliers;
- to suppliers offering plagiarism checking services and other academic institutions to identify instances of collusion in relation to plagiarism misconduct;
- to third parties wishing to access a catalogue within the College library containing reference to student work.

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 assisting 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 exams using web platforms, conferencing & recordings;
- 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 in such pictures, please make sure you inform us about this. Please see our Privacy notice for Events at https://www.coleurope.eu/sites/default/files/uploads/page/privacy_policy_events.pdf;
- 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 organized 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>.

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 organizations based within the European Economic Area (EEA).

When it is necessary to share your data with organizations outside the EEA, we ensure that these countries are either approved by the European Commission as having ‘adequate protection’ or we put in place ‘appropriate safeguards’ and contracts with these organizations. What that means is that whoever we transfer data to will have to agree to protect the personal data in an appropriate way.

Retention periods

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

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

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 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(2)(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(2)(g)), processing “special categories” of data where necessary for reasons of substantial public interest.
- (Article 9(2)(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.
- (Article 9(2)(i)), processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

Your rights as an individual and how to exercise them

As a data subject, you have the following rights in relation to your personal data which is processed by the College:

- 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 to certain processing of your personal data by us.

Please see <https://www.privacycommission.be> for further information on the above rights.

You can exercise your rights and acquire further information by contacting the Privacy Office

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. For more information, please see <https://www.dataprotectionauthority.be>.

You can contact the Data Protection Authority

- By e-mail: contact@apd-gba.be
- By post: Belgian Data Protection Authority
Drukpersstraat 35; 1000 Brussels; Belgium
- By phone: +32 2 274 48 00

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

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 <https://www.coleurope.eu/privacy>.