

General purpose of this Notice

The College of Europe, Bruges & Tirana 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.

Controller and responsibility

The College is the data controller for processing personal data of its students.

The purposes for which we process your personal data

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 related to our activities.

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;
- Making and keeping student records on central systems, maintaining your student record and managing academic processes;

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)

- Educational, assessment and training purposes, including providing you with technology which assists you to undertake and manage your studies, 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 visa/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, 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 student awards;
- Where you provide written consent, providing references to future employers or other education institutions;
- Statistical and archival purposes.

You can contact the Privacy Office for more detailed information.

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. We will also keep records relating to assessments of your work, details of examinations taken, qualifications, your grades and other information in your student record;
- Financial information such as bank details, details of funding and fees;
- Any records relating to cases e.g. malpractice, disciplinary actions;
- Visa and immigration information, including visa and passport details;
- Your student number and other examples of technical data related to library management, ICT services, reprography and distribution of course and other related material, archiving and records management (digitally and physical), administration and management of communications, mail office activities. e.g. C--Card and C--Account;
- Information about your family or personal circumstances, both academic and non-academic, for the assessment and management of bursaries and scholarships.

Some of the above-mentioned personal data qualify as “special categories of data” as described under the GDPR. This is the case for personal data revealing racial or ethnic origin, religious or philosophical beliefs, biometric data used for the purpose of uniquely identifying and data concerning your (physical

or mental) health or data concerning a natural person's sexual orientation. The processing of such data is based upon your consent and aimed solely at the good execution of our contractual relationship, including the provision of support as mentioned in the preceding clause.

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, assessment and related services (e.g. housing or support).
- (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 its recognised diplomas and certifications have an impact on the public interest making it that the processing of personal data in relation to obtained results is necessary for the performance of a task carried in the public interest.
- (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 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)(f)), processing “special categories” of data in connection with legal claims.
- (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 EU 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.

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.

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 are a student and participate in academic and non-academic activities;
- 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

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 s.a. the Flemish government and the city of Bruges and/or Tirana;
- 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 or professional program. E.g. disclosure of attendance, conduct and progress information;
- to other educational institutions which the College partners with, 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 providers supplying, supporting and hosting our 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.

Transfers to third party countries

In case the course(s) and/or services that are the subject of our agreement with you, as shall be evidenced by your enrolment documentation, take place – either partially or in full – at a campus outside of the European Economic Area, this implies that some personal data shall be transferred to the third countries in which the concerned campus is situated.

We will limit the transfer of data to such third countries to the data that are deemed needed to fulfil our obligations to you under our agreement. In case the concerned campus is directly managed by us, the primary processing happens within our College and transfers to third parties will be limited to exchanges that are necessary on the basis of local legislation, e.g. in order to comply with regulations on immigration or temporary stay. In case the concerned campus is managed by an entity that is distinct from our College but with whom we have entered into a collaboration agreement, we enter into a written data processing agreement with such partner, the latter acting as a processor, whereby the data processing agreement shall take into account (i) whether or not there is an adequacy decision from the European Commission and (ii) the applicable standard contractual clauses for the transfer of personal data to third countries pursuant to the Commission implementing decision (EU) 2021/914 of 4 June 2021.

You, from your side, acknowledge that the aforementioned personal data transfers are a part of the execution of our agreement and you hereby specifically agree and, subject to the above mentioned endeavours from our side, consent to the transfer of such personal data for the reasons as mentioned in this article.

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 for the intended purpose or required by law.

More information on the retention policies can be found at
<https://www2.coleurope.eu/groups/privacy-office>.

How do we protect and safeguard your information?

All personal data collected is internally processed only by designated College staff members or agents (such as service providers) and stored on systems which abide by the College's security rules and standards. In case other controllers process your personal data, we refer to the notices of these controllers.

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up-to-date. We have, for example, measures in place to protect against accidental loss and unauthorized access, use, destruction, or disclosure of data.

Your rights as an individual and how to exercise them

As a data subject, you have rights in relation to your personal data which are processed by the College. In the below paragraphs, we present you with an overview of your rights, followed by the way you can exercise these rights, both towards us and towards the competent authority in case you would feel that our endeavours to comply with your rights would not be sufficient.

At first you have, at all times, the right to request access to the personal data that we process with regard to your person. Upon your request, you can obtain the personal data that we process as well as information regarding the purposes of the processing, the categories of personal data concerned, the retention periods or the recipients or categories of recipient to whom the personal data have been or will be disclosed.

In case it would appear that we process inaccurate personal data, you can at all times request the rectification of the inaccurate data.

You can request us to erase your personal data, which request shall without undue delay be met in case the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed, in case the data would have been unlawfully processed, in case the data had to be erased for compliance with a legal obligation or in case of withdrawal of your consent in case this consent is the sole legal basis for the processing of the concerned data.

The last element of the foregoing sentence also implies that you have the right, for all personal data that are processed on the basis of your consent to the processing, to withdraw your consent at any time.

With regard to all personal data that are processed by automated means and on the legal basis of either your consent or the execution of our contractual relationship, you have the right to receive the personal data which you have provided to us, in a structured, commonly used and machine-readable

format and have the right to transmit those data to another controller without hindrance from our side.

In case a discussion would arise between us and regarding the processing of your personal data, you can, pending the outcome of this discussion, obtain restriction of the procession of such data.

You can exercise your rights and acquire further information by contacting our designated Privacy Office via the contact details on the bottom of this policy.

You can also contact us via our webpage: www.coleurope.eu/privacy.

In case you contact us in order to exercise either one of the above rights, please do not forget to deliver proof of your identity by enclosing a copy of your identity document (ID card or passport).

You also 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

Updates and other guidelines and policies

Updates

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>.

Additional notices and guidance/policies

Please note 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 (<https://www2.coleurope.eu/groups/guidelines-regulations>);
- Events at or organised by the College of Europe (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://www.coleurope.eu/alumni> ;
- 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>.

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 & Tirana Campus;
Dijver 11; 8000 Brugge; Belgium
- By phone: +32 50 47 71 11