

# Privacy statement

## For the processing of personal data for scholarships or subsidy

14 January 2020

### Why this privacy statement?

This privacy statement applies to the collecting and processing of personal data you provide directly or indirectly to Stichting Nuffic when you submit an application for a scholarship or subsidy under one of the following programmes:

- NN-Future Matters (NN-FM)
- Culturele verdragen (CV)
- Sino-Dutch Bilateral Exchange Scholarship programme (SDS)
- Desmond Fortes Scholarship (DSF)
- European University Institute (EUI)
- Internationalisering PO en VO (IPV)
- Van Gogh programma (Van Gogh)
- VSBfonds beurzenprogramma (VSB)
- Holland Scholarship (HS)
- Orange Knowledge Programme (modalities OKP-IS; OKP-ICP; OKP-Group Training; OKP-Alumni Activities)
- Mena Scholarship Programme (MSP)
- NICHE programme
- Netherlands Fellowship Programmes (NFP)

Stichting Nuffic acts as a data processor for the above mentioned programmes. However, since we process your personal data, we want to inform you why we collect personal data, for which purposes and how you can exercise your rights with regards to your personal data.

### How do we collect your personal data?

Depending on the programme you either submit an application for a scholarship or subsidy via Stichting Nuffic's online application system Delta, or via email by sending it to Stichting Nuffic or submitting your application directly to the donor organisation.

## Why do we collect your personal data?

On behalf of different scholarship programmes and organisations, Stichting Nuffic collects personal data with regard to the application, selection and management of applications for scholarships or subsidy. Individual candidates, organizations and institutions can apply for a scholarship or subsidy in the context of these programmes.

An application contains different kinds of personal data. These data can be used for the following purposes:

1. To determine the identity of an applicant and to properly address an applicant in our communication;
2. To check the eligibility of an application;
3. For the assessment and selection procedures;
4. To inform applicants, and if applicable specific parties about the result of the application, and to deal with possible objections;
5. To award a scholarship/subsidy;
6. To manage an awarded scholarship or subsidy (including payment of the scholarship/subsidy amount);
7. To produce general statistics, both for the data controllers that commission Stichting Nuffic to subsidise scholarships as well as for the general public task of Stichting Nuffic to promote internationalisation of education;
8. For registering the personal data of individual scholarship holders into the Holland Alumni Network based on the consent of the scholarship holder for networking activities based on their expertise or country of residence, or for sharing knowledge or for offering training and career opportunities;
9. In rare cases, specified in the paragraph *Who has access to your personal data*, provision of some of your personal data to the original data controller;
10. to gain insights on the effects and benefits of the programmes in so called tracer studies. This involves contacting applicants and sending them questionnaires before and after completion of their studies in the Netherlands, to evaluate the effects of their scholarship or subsidy.

## Which personal data do we collect?

In the table below you can find an overview of personal data and for which programmes we collect which type of data and for which purpose. With regard to name of institution and specific education: for general statistics we only use the name of the institution in the Netherlands, the specific education for which the grant or scholarship was awarded, and the country of residence of applicants.

Personal data	NN-FM	CV	SDS	DFS	EUI	IPV	Van Gogh	VSB fonds	HS	OKP	MSP	NFP	NICHE
First and surname, address, country (of residence), city of residence, contact details,	1 to 7	1 to 8	1 to 8	1 to 7	1 to 8	1 to 8	1 to 7,9	1 to 8	1,2,7,8	1 to 3; 4 to 10	1 to 3;5, 7 to 10	1-3;5, 7 - 10	4 - 7,10
Name of institution and specific education	1,3, 5, 7	2, 5, 6, 7	2,3,5,6,7	2,3,5,6,7	2,5,6,7	n.a.	2,3,5,6,7	2,3,4,5,7	1,2,4,7,8	2,3,5,7,10	2,3,5,7,10	2,3,5,7,10	n.a.
Copy of passport, date of birth, place of birth	1-2	1	1	n.a.	1	n.a.	1	n.a.	n.a.	1	1	1	n.a.
Gender	1	1	1	1	1	1	1	1	1	1,5,7,8	5,7,8	5,7,8	1
Nationality	1,2,3 7	1,2,3 7	1,2,3 7	1,2,3 7	1,2,3 7	n.a	1	1,2,3 7	1,2	1,2,3 7,8	1,2,3 7,8,9,10	1,2,3 7	n.a.
Bank account number, name bank, bank statement, name account holder (individual applicant)	6	6	6	6	6	n.a.	n.a.	6	n.a.	n.a.	n.a.	n.a.	n.a.
Result of the application	4, 5, 7	4, 5, 7, 8, 9	4, 5, 7, 8, 9	4, 5, 7, 8	4, 5, 7, 8	4, 5, 7	4, 5, 7	4, 5, 7, 8	7, 8	4, 5, 7, 8, 9, 10	4, 5, 7, 8, 9, 10	4, 5, 7, 8, 9, 10	4, 5, 7, 10

We collect the following special categories of personal data and highly sensitive personal data:

	NN-FM	CV	SDS	DFS	EUI	IPV	Van Gogh	VSB fonds	HS	OKP	MSP	NFP	NICHE
Copy of your passport or identity card	X	X	X	n.a.	X	n.a.	X	n.a.	X	X	X		
Result of a physical examination	n.a.	X	X	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.		
If you are likely to regularly experience any sort of discrimination and/or marginalisation due to any personal physical features.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	X	n.a.		

## Who has access to your (personal) data?

We only share personal data if necessary. If Stichting Nuffic as a data processor uses third parties to process your personal data, these third parties must always act as sub processors for Stichting Nuffic. The commissioning data controllers have to give permission to Stichting Nuffic to use sub processors, and they will be bound legally, with a sub processor agreement, to only process the personal data for the specific purposes outlined in the agreement between the data controller and Stichting Nuffic.

For the following programmes we do not provide your personal data to third parties: NN-FM, DSF, EUI, IPV, Van Gogh, OKP- Group Training, OKP- Alumni Activities, NICHE, VSBfonds.

If we share your personal details with the specific parties we do this for the assessment and selection procedure (CV, SDS, OKP-IS, OKP-ICP, MSP, NFP), to inform them about the result of the (pre)selection (CV, SDS, OKP-IS, MSP, NFP), to manage the awarded subsidy or scholarship (CV, SDS), for informing donor about the results of the programme reporting purposes (all programmes).

For the programmes below we share your personal data with the following specific parties:

- Sino-Dutch Scholarship Programme: shared with the China Scholarship Council (CSC);
- CV: shared with Foreign authorities offering the scholarship;
- Van Gogh: shared with Campus France, the French Ministry of Higher Education, Research and Innovation and the French Ministry for Europe and Foreign Affairs;

- OKP- ICP: shared with the Application Assessment Committee (AAC);
- OKP-IS: shared with Dutch institution offering the course;
- MSP: shared with Dutch institution offering the course.

## **What are the legal grounds for the processing of your personal data?**

As a data processor, Stichting Nuffic relies on the legal grounds of the commissioning data controllers. These data controllers usually rely on the legal ground of the necessity to process your personal data to enter into, or perform an agreement with you (article 6(1) under b of the GDPR). They may also invoke the necessity for the performance of their public tasks, or in case of private sector scholarship organisations, their legitimate interest as defined in article 6(1) e and f respectively. These grounds can be invoked, for example, when producing statistics about the effects of scholarship programmes.

Data controllers may also ask for your specific consent to participate in voluntary programmes such as Holland Alumni, to allow the data controllers to contact you after completion of your studies in the Netherlands.

If it is necessary to identify you, or to allow you to benefit from specific educational programmes, the data controlling organisations in the Netherlands can rely on specific (Dutch) exceptions on the prohibition to process special categories of personal data.

## **Processing your personal data outside the European Union**

We do not transfer your personal data to parties located in a country outside of the European Economic Area (EEA), unless we have ensured an adequate data protection regime.

## **The storage of your personal data**

The personal data are stored in a secure environment and Stichting Nuffic has taken effective organisational and technical security measures to protect your personal data against for instance misuse and unauthorised disclosure.

We do not store the personal data you submit longer than necessary. Our commissioning data controllers have asked us to store your personal data for the following specific terms:

- Applications that have resulted in a scholarship or subsidy: 8 weeks after settlement of the subsidy/scholarship. If the application is or will be part of tracer studies then the email address of the applicant will be saved until the applicant indicates that he/she does not want to be part of a tracer study;
- Applications that have been withdrawn before selection: direct deletion 8 weeks after the date of withdrawal;

- Applications that have not resulted in a scholarship or subsidy: 8 weeks after the date of the negative decision (to allow the candidate the object against the decision);
- Applications that are assessed as non-eligible: 8 weeks after the date of the negative assessment (to allow the candidate the object against the decision);
- If a rejected applicant objects against the decision: 1 year after receipt by Stichting Nuffic of the written objection;
- If a rejected applicant appeals the decision (in court): 1 year after the date of the written appeal has been filed with a court;
- Special categories of data, as defined in Article 9 of the GDPR, and highly sensitive data such as a copy of your passport, are deleted 8 weeks after the letter informing you of the result of your application.

## Your rights with regard to your personal data

You have the right to request to see which data we have stored relating to you, or ask for it to be amended or removed. You can request to receive an export of your personal data (in Word/Excel format).

We cannot remove your data as long as we still need them for the execution of the agreement we have with you, or if we need to store your data for another reason. This is the case, for example, if you have applied for funding (see 'The storage of your personal data').

A request to get access, amend, or remove your data is free of charge. If your request is manifestly unfounded or excessive Stichting Nuffic can inform you why it cannot process your request

You can submit a request here <https://www.nuffic.nl/en/subjects/request-see-amend-or-remove-registered-details/>.

We will respond to your request within 1 month. If your request is more complex we will let you know within that month if we need more time.

## The Data Protection Officer

The Data Protection Officer (DPO) who supervises the application of and compliance with the GDPR at Stichting Nuffic is:

Drs. Sjoera Nas

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She works as a senior advisor for Privacy Company in The Hague.

## Privacy policy amendments

This statement is available at the Stichting Nuffic website [www.nuffic.nl/privacy](http://www.nuffic.nl/privacy) . Stichting Nuffic reserves the right to amend this privacy statement within the framework of the applicable laws and regulations relating to privacy and data protection, more specifically the General Data Protection Regulation (GDPR). If the changes would entail material changes of the purposes of the data processing or the changes would otherwise require your consent, we will inform you in advance and seek your renewed consent where appropriate.