Privacy policy Stichting Nuffic

We are aware that you have placed your trust in us. Therefore, we handle your personal data with the utmost care. How exactly do we do that?

You register with a network, sign up for a training or subscribe to a newsletter. When you use one of our services, we ask you for your personal details, so that we can provide you with good service. These could be your name, address, email address and telephone number.

1 General

1.1 Use
We will use your personal data exclusively for the purpose for which you have provided it. If you entered your name and email address to subscribe to a newsletter, for example, we will not use the data to send you other information. Unless expressly stated otherwise, we will not pass on your personal data to third parties. Your data may be used by the authorities, if legally required.

If you ask us a question we may need to involve another organisation to answer this question. The data that we exchange with this organisation will only be used by them to answer your question.

When you subscribe to a newsletter, you can indicate a preference for certain topics. You will then only get to see news about those topics. We will save your preferences for as long as you are subscribed to the newsletter.

1.2 Under 16
If you are under 16 years of age your parents or guardians need to give us permission to process your personal data.

1.3 Storage and protection
We do not store your personal data for longer than necessary. For example, if you cancel your subscription to one of our newsletters, we will delete your personal data. We will process and protect your personal data with due care.
2 Scholarship and subsidies

We have a special privacy policy for the programmes below. This applies to the collecting and processing of personal data you provide to us - directly or indirectly - when you submit an application for a scholarship or subsidy under one of these programmes:

- NN-Future Matters (NN-FM)
- Culturele verdragen (CV)
- Sino-Dutch Bilateral Exchange Scholarship programme (SDS)
- Desmond Fortes Scholarship (DSF)
- European University Institute (EUI)
- Internationalising 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)
- HOPES-LEB
- EDU-Syria
- United World College (UWC)
- StuNed

We act as a data processor for the above mentioned programmes. Since we process your personal data for these programmes, we want to inform you why we collect this data and for which purposes.

2.1 How do we collect data for these programmes?
Depending on the programme you either submit an application for a scholarship or subsidy via our online application system Delta, or via email, or you submit your application directly to the donor organisation.

2.2 Why do we collect these data?
On behalf of different scholarship programmes and organisations, we collect personal data with regard to the application, selection and management of applications for scholarships or subsidy. Individual candidates, organisations 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 us to subsidy scholarships as well as for our general public task 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 under Who has access to your data, provision of some of your personal data to the original data controller;
10. to gain insights into 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.

2.3 Which personal data do we collect?

We collect the following types of data:

- name and address: first and last name, address, country and city of residence, contact details;
- education: name of institution and specific education of individual applicant: 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;
- identity document: copy of passport or other identity document, date of birth, place of birth;
- gender;
- nationality;
- bank details: bank account number, name bank, bank statement, name account holder (of the individual applicant);
- result of the application.
In the table below you can find an overview of which type of personal data we collect for which programmes and for which purpose (numbers refer to the list above):

<table>
<thead>
<tr>
<th>Programme</th>
<th>Name and address</th>
<th>Education</th>
<th>Passport data</th>
<th>Gender</th>
<th>Nationality</th>
<th>Bank details</th>
<th>Result of the application</th>
</tr>
</thead>
<tbody>
<tr>
<td>NN-FM</td>
<td>1–7</td>
<td>1, 3, 5, 7</td>
<td>1-2</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7</td>
</tr>
<tr>
<td>CV</td>
<td>1–8</td>
<td>2, 5–7</td>
<td>1</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7 - 9</td>
</tr>
<tr>
<td>SDS</td>
<td>1–8</td>
<td>2, 3, 5–7</td>
<td>1</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7 - 9</td>
</tr>
<tr>
<td>DFS</td>
<td>1–7</td>
<td>2, 3, 5–7</td>
<td>n/a</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7, 8</td>
</tr>
<tr>
<td>EUI</td>
<td>1–8</td>
<td>2, 5–7</td>
<td>1</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7, 8</td>
</tr>
<tr>
<td>IPV</td>
<td>1–8</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>4, 5, 7</td>
</tr>
<tr>
<td>Van Gogh</td>
<td>1–7, 9</td>
<td>2, 3, 5–7</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>n/a</td>
<td>4, 5, 7</td>
</tr>
<tr>
<td>VSBfonds</td>
<td>1–8</td>
<td>2–5, 7</td>
<td>n/a</td>
<td>1</td>
<td>1 - 3, 7</td>
<td>6</td>
<td>4, 5, 7, 8</td>
</tr>
<tr>
<td>HS</td>
<td>1, 2, 7, 8</td>
<td>1, 2, 4, 7, 8</td>
<td>n/a</td>
<td>1</td>
<td>1, 2</td>
<td>n/a</td>
<td>7, 8</td>
</tr>
<tr>
<td>OKP</td>
<td>1–10</td>
<td>2, 3, 5, 7, 10</td>
<td>1</td>
<td>1,5,7,8</td>
<td>1 - 3, 7 - 10</td>
<td>n/a</td>
<td>4, 5, 7 - 10</td>
</tr>
<tr>
<td>MSP</td>
<td>1–10</td>
<td>2, 3, 5, 7, 10</td>
<td>1</td>
<td>1,5,7,8</td>
<td>1 - 3, 7 - 10</td>
<td>n/a</td>
<td>4, 5, 7 - 10</td>
</tr>
<tr>
<td>NFP</td>
<td>1–10</td>
<td>2, 3, 5, 7, 10</td>
<td>1</td>
<td>1,5,7,8</td>
<td>1 - 3, 7 - 10</td>
<td>n/a</td>
<td>4, 5, 7 - 10</td>
</tr>
<tr>
<td>NICHE</td>
<td>4–7, 10</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>4, 5, 7 – 8</td>
</tr>
<tr>
<td>HOPES-LEB</td>
<td>1–7, 8–10</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>6</td>
<td>n/a</td>
</tr>
<tr>
<td>StuNed</td>
<td>1–10</td>
<td>2, 3, 5, 7, 10</td>
<td>1</td>
<td>1,5,7,8</td>
<td>1 - 3, 7 - 10</td>
<td>n/a</td>
<td>4, 5, 7 - 10</td>
</tr>
<tr>
<td>United World College (UWC)</td>
<td>1–7, 10</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>n/a</td>
<td>n/a</td>
</tr>
<tr>
<td>EDU-Syria</td>
<td>1–7, 8–10</td>
<td>n/a</td>
<td>n/a</td>
<td>1</td>
<td>n/a</td>
<td>6</td>
<td>n/a</td>
</tr>
</tbody>
</table>

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

- identity document (for NN-FM, CV, SDS, EUI, Van Gogh, OKP, MSP and StuNed);
- the result of a physical examination (for CV and SDS);
- if you are likely to regularly experience any sort of discrimination and/or marginalisation due to any personal physical features (for OKP);
- nationality.
2.4 Who has access to these data?

We only share personal data if necessary. If we, as a data processor, use third parties to process your personal data, these third parties must always act as sub processors for us. The commissioning data controllers have to give us permission 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: EUI, IPV, Van Gogh, OKP- Group Training, OKP- Alumni Activities, NICHE, StuNed.

If we share your personal details with specific parties we do this for the assessment and selection procedure (CV, SDS, OKP-IS, OKP-ICP, MSP, NFP, StuNed, HOPES-LEB and EDU-Syria), to inform them about the result of the (pre)selection (CV, SDS, OKP-IS, MSP, NFP, StuNed), 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;
- StuNed: shared with Dutch institution offering the course;
- NNFM: shared with Dutch institution offering the course;
- DFS: shared with Dutch institution offering the course;
- VSBfonds: shared with Dutch institution who nominates the candidate;
- HOPES-LEB: shared with Lebanese consultants;
- EDU-Syria: shared with Jordanian consultants.

2.5 What are the legal grounds for processing these data?

As a data processor, we rely 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 the Holland Alumni network, 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 education programmes, the data controlling organisations in the Netherlands can rely on specific (Dutch) exceptions on the prohibition to process special categories of personal data.

2.6 Processing your 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.

2.7 The storage of these personal data

The personal data that you submit for a scholarship or subsidy application are stored in a secure environment and we have 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 an application has been awarded subsidy or a scholarship under a programme that carries out evaluations (such as track and/or tracer studies) then the following personal data and/or documents will be saved until the applicant indicates that he does not want to be part of the evaluation: country / country of residence; current position (of individual); date of birth; email address (of individual / or individual at organisation); first, middle and surname (of individual applicant or contact person at applying organisation); gender; nationality; telephone number (of individual or individual at organisation); name contact person/supervisor (at organisation); budget / budget proposal including any personal data in this document; COCA document including any personal data in this document; project proposal including any personal data in this document; Intermediate and final reports;
- 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 we receive the written objection;
- If a rejected applicant appeals the decision (in court): 1 year after the date that 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.
3 Your rights

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, using the form below. You can also revoke your consent (if applicable).

Request to access, rectify or erase your personal data

For newsletters you can also use the online unsubscribe option. Your data will then be automatically removed from the mailing list of the newsletter.

For the data listed under ‘Scholarships and subsidies’ you can request to receive an export of your personal data (in Word/Excel format).

We cannot remove your data if we need them to carry out an 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. When you apply for a job with us, we will store your information for the duration of the application procedure.

3.1 Costs

A request to see, amend, or remove your data is free of charge. 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.

If your request is manifestly unfounded or excessive, we can decide not to process your request.

3.2 Complaint or objection

If you do not agree with the way we process your personal data, you can submit a complaint to Nuffic. You can read how to file a complaint in our complaints procedure. You can also submit your complaint to the Dutch Data Protection Authority.

You can also object to the processing of your personal data if we process them on the basis of protection the legitimate interests of Nuffic or of a third party to whom we provide the data. You can find out how to do this by checking our objection procedure.

4 Data Protection Officer

The Data Protection Officer (DPO) who supervises the application of and compliance with the GDPR at Nuffic is:
She works as a senior adviser for Privacy Company in The Hague.

5 Privacy policy amendments

We reserve the right to amend this privacy policy within the framework of the applicable laws and regulations relating to privacy and data protection, more specifically the General Data Protection Regulation (GDPR). We will inform you about any amendments to our privacy policy.

If there are significant changes in the purposes of the data processing listed under ‘Scholarships and subsidies’, or if there are any changes that would require your consent, we will inform you in advance. We will seek your renewed consent where appropriate.

6 Cookies

Our website uses cookies. Read our cookie statement to find out what this means for you.