

# Privacy statements complaints JOIN

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This privacy statement explains what happens with your personal data after sending in a complaint

## Who is responsible for processing your personal data?

Utrecht University (UU) is responsible for processing your personal data as meant in General Data Protection Regulation (GDPR). UU is a public legal entity pursuant to "art. 1.8 Law on Higher Education and Scientific Research" and is located at Heidelberglaan 8, (3584 CS) Utrecht.

UU has the legal obligation to process your personal data carefully. DocLogic, the vendor of the tool used to register your complaint, is also bound to this legislation. The Vendor has signed a processing agreement.

## For what purposes does UU process your personal data?

- A. Handling student complaints;
- B. Consulting previous complaints in order to better respond to similar complaints
- C. Identifying abuse and malperformance
- D. Gaining insight into how the complaints desk is used and what complaints are generally about
- E. Using that information to improve the safety and quality of education offered by UU.

## What kind of data does UU collect?

If you submit a complaint, the following personal data may be processed:

- Input fields on the complaint form:
  - Student number
  - Name
  - Phone number
  - E-mail address
  - Faculty
  - Educationprogramme
  - Complaint (incl. name of the person against whom the complaint is directed)
  - Suggestion for possible solution
  - Information about the complaint (filed elsewhere, discussed elsewhere)
  - Files that are added by the submitter, such as an email exchange that is the subject of a complaint or a scrap form from an exam
  - Any correspondence regarding the complaint by the complainant, the accused and the complaints coordinator
- Technical data
  - Your emailaddress is used as a unique identifier when you register at the complaints desk. It is used for matching and to avoid duplicate accounts
  - The following is logged of Users:
    - Authentication (logging into the tool)
  - The following is logged of complaints handlers and coordinators:
    - Authentication (login into the tool)
    - Every action, including changes to files, changes to status (new or completed), Inspection of files is logged
  - The following is logged of Administrators:
    - Authentication is logged
    - Every action, including changes to files, changes to status (new or completed), Inspection of files, Granting and changing authorizations.

Sensitive personal data may also be processed. This only happens if the complainant makes this known in, for example, the complaint form or the correspondence relating to the complaint.

#### **How long are the data stored?**

- The complaint file is kept for 5 years after a complaint has been closed
- The complainant/defendant's portal will be deleted after 1 year of inactivity
- Technical data: 6 months

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

The ground "legal obligation" applies.

Pursuant to art. 7.59a of the Higher Education and Scientific Research Act, the UU is obliged to facilitate a complaints desk and to handle complaints from students, among others. The primary process of setting up such a complaints desk and handling the complaints, requires personal data to be processed.

Processing data for the purpose of creating reports, is a matter of "general interest". UU provides higher education, that needs and wants to meet quality standards. In order to guarantee a safe studying environment, and quality of education, we need information to understand where, what and why things are not going well. Additionally, it needs to be monitored whether Users can find their way to the complaints desk at all.

The task of reporting on complaints by the complaints coordinator is also a matter of "general interest". Issues regarding abuse and malperformance, need to be followed up with the proper action to solve those issues, and contribute to a safe climate and quality education.

#### **Will my data be shared with third parties?**

Your data will only be shared with the Vendor, DocLogic. With this, confidentiality agreements have been made in the processing agreement.

The complaints coordinator will also share your complaint with the person or department you are complaining about.

#### **Will my personal data be processed outside the EEA?**

Personal data is only processed within the EEA.

#### **How can I exercise my rights?**

As a person whose personal data is processed (data subject) you can exercise your data subject rights. This means that you can view the personal data that we process, have it corrected, limit its processing or have it removed. Please note that this is not possible in all cases, especially if the processing takes place because it is required by law or if your personal data has been anonymized. Do you want to have your data removed? Please contact your complaints coordinator or [privacy@uu.nl](mailto:privacy@uu.nl). Know that you can always view and delete your data on your own portal.

#### **Contact and complaint options**

Do you have questions or doubts about the processing of your personal data? First of all, you can contact your complaints coordinator. In addition, our internal privacy supervisor, the data protection officer, is always willing to deal with questions or complaints via [privacy@uu.nl](mailto:privacy@uu.nl). You are of course also free to submit a complaint to the national supervisory authority, the Dutch Data Protection Authority (see the AP [website](#)).