

**PRIVACY STATEMENT FOR STUDENTS**

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## **1. Who are we?**

### **1.1. PXL as data controller**

With this statement (hereinafter referred to as "**Statement**") we would like to inform you about why and how your personal data are collected and processed by PXL University of Applied Sciences and Arts, a Flemish public law institution with a sui generis character with its seat at Elfde Liniestraat 24, 3500 Hasselt, and with company number 0535.878.874 (hereinafter referred to as "**we**" or "**PXL** ").

Our contact details can be found under point 10 of this Statement.

We are responsible for the processing of the personal data that we request and use. As data controller, we take the measures to ensure that you:

- remain informed about our processing of your personal data;
- retain control over the personal data we process;
- can exercise your rights in relation to your personal data. More information about your rights can be found under point 9 of this Statement.

### **1.2. Data Protection Officer**

We have also appointed a data protection officer. This is an expert on the protection of personal data who provides an additional guarantee for the correct processing of your personal data by us.

You may contact the official through the channels listed under point 10 of this Statement.

## **2. What data do we collect about you?**

"Personal data" means all information that refers to a particular living natural person.

Depending on the purpose of the processing, we process different types of personal data.

You may – for each purpose mentioned under point 3 of this Statement – find the categories of personal data used for that specific purpose. In the context of our psychosocial guidance (see point 3.2 of this Statement), also so-called 'sensitive personal data' can be processed, including:

- personal data showing race or ethnic origin, religious or philosophical beliefs;
- health data.

### **3. What do we need your personal data for?**

#### **3.1. Education- and student administration**

##### **3.1.1. What does this mean?**

As an educational institution, we process personal data of our students in the context of the courses and programmes we offer. Education- and student administration, which is carried out from the time of registration until after receiving the degree, includes several components and includes inter alia:

- student enrolment;
- concluding agreements with students;
- organising educational activities;
- informing them of timetables;
- the organisation of examinations;
- keeping exam results;
- the issue of diplomas, certificates, titles and qualifications;
- being able to provide information flows so that we can communicate effectively with you by mail, email and phone, including sending newsletters;
- ...

In the broader context of the education administration, we must also ensure the quality of our educational activities. Students, alumni, external experts from the professional field and international experts are involved in the processes of quality assurance.

Finally, the personal data we receive in the context of the education and student administration are further processed for statistical purposes, in particular to analyse our policies and education and for scientific research.

##### **3.1.2. What categories of personal data are processed?**

We collect and process the following types of data:

- identification data (name, address, telephonenumber, id-cardnumber, passport number, INSZ number, personal email address...);
- personal characteristics (time, gender, date of birth, country and place, marital status, nationality ,photo or image data, license plate, ... );
- education and training (overview of the schools visited, nature of the courses followed, intended degrees, exam results, etc.) ;
- financial information (bank account number of the financial responsible (student and/or father and/or mother));
- occupation and employment if you are a working student;
- health data if required for your study and/or internship activities;
- details of the persons you have specified who may be contacted in case of an emergency;
- scholarship status;
- data related to the follow-up to the policy of PXL (disability (if applicable), maternal grandmother's birth, name and occupation of parents, ...).

## **3.2. Student guidance and student services**

### **3.2.1. What does this mean?**

We offer support when studying or with assignments that you need to complete, as well as guidance if you have specific needs or personal difficulties. As part of our study career counselling, process guidance or psychosocial support, as well as in the context of our financial and social support, we collect and process your personal data. Without your personal data, tailor-made guidance is not possible. Requested individual adjustments can only be granted and optimally organized if we have your personal data.

Individual personal student data can be used for monitoring the individual learning progress and for providing targeted feedback and guidance. This is part of the educational policy of PXL to create powerful learning environments.

This data can also be used for more general analyses as part of PXL policy to guarantee students maximum development opportunities.

### **3.2.2. What categories of personal data are processed?**

The following types of data, which may also include so-called sensitive data, can be addressed, collected and processed as part of guidance and policy follow-up:

- surveying minority groups (nationality, home language, nationality parents and grandparents, ... );
- family composition;
- health data;
- information on philosophical-religious views;
- data relating to sexual behavior or sexual orientation;
- information on solvency (assessment of income and financial status);
- lifestyle habits (details concerning the consumption of goods or services, behaviour of the individual or his family, etc. );
- leisure time;
- housing characteristics of the individual or his family;
- occupation of the individual or his family;
- results from the orientation process (LEMO-test, language test, training-related entry tests, etc.);
- data regarding the application for a status and facilities (disability, employment, top sport, special circumstances);
- data on previous GON guidance;
- Learning Analytics.

## **3.3. Cookies on our website**

PXL's websites use cookies. Cookies are small text files stored on your device, and similar technologies. More information about this can be found in our cookie statement which can be found on the relevant websites.

### 3.4. PXL Wi-Fi Network

As a student, you can use PXL's Wi-Fi network. When you do this, the following information is collected: the student number you logged in with, the MAC address to identify your device, and your browsing habits (such as the type of information you're looking for and the preferences for certain websites).

We collect this data from the legitimate interest to prevent possible misuse of the network. If illegal activity takes place from our Wi-Fi network, we can block access to the student number that was logged into the network.

This information is not shared with others, unless the network is used illegally, or suspicions are made to do so. In this case, the data can be passed on to the judicial authorities and, if any, our professional advisers.

## 4. Do we ask your permission for processing?

Processing personal data can only be done lawfully if it is based on a legal basis. Consent is only one possible legal basis, in addition to, among other things, (i) the legal obligation to process, (ii) the necessity of processing for the implementation of an agreement, (iii) a public interest, and (iv) a legitimate interest.

Our processing of your personal data, which we carry out for the purposes specified under point 3 of this Statement, have the following principles:

- We are **legally required** to process certain data.

This is the case for the processing that is done on the basis of the obligations we have as an educational institution as defined in the [Codex Higher Education](#)

- The use of your personal data is necessary for the implementation of the **accession agreement** that you conclude with us as a student or to be able, at your request, to take the necessary steps to reach an agreement with us.
- We must have your explicit and free **consent** to use your personal data for a specific purpose.

If we need your consent for processing, in particular when sensitive personal data is received in the context of our student facilities or study guidance, we will provide you with a specific consent form in this regard and this prior to processing.

## 5. With which other people do we share your personal data?

Your personal data will not be passed on to other persons, with the exception of the following:

- only our **employees** who need access for the performance of their duties will have access to your data. These individuals act under our supervision and responsibility.

- In addition, we also rely on **specialised external suppliers** who carry out certain processing operations for us, such as IT services, lawyers and bailiffs. Since these third parties have access to personal data in the context of the services requested by us, we have taken technical, organisational and contractual measures to ensure that your personal data is only processed and used for the purposes specified under point 3 of this Statement.
- Under certain conditions, we may provide your personal data to **government institutions and public administrations, higher education institutions and external organisations (such as an external medical service)**, but only to the extent that this is directly aimed at the studies, in the interest of the students and access to the labour market.
- In the context of internship activities, workplace learning and/or external evaluations (jury, ...) we provide your personal data to the **internship/apprenticeship** and/or evaluators, but only to the extent necessary for this internship, apprenticeship and/or evaluation.
- Only if we are legally obliged, we will provide your personal data to police- **and investigation services and the judiciary.**

Certain data may also be passed on to the following persons, but only if you have given **your consent**, such as

- passing on study results to your secondary school;
- the transmission of certain data to student restaurants (e.g. on allergens) and facility managers;
- the transmission of personal data to the press.

## 6. Where is the data stored and processed?

Your data will not be transported outside the EU and in any case we will ensure that the legal minimum requirements and safety standards are respected at all times.

If we foresee that your data will be stored and processed outside the EU, we will explicitly state this and ensure that the same level of protection is applied as applicable within the EU.

## 7. How long do we keep your personal data?

### 7.1. General

We will only store your data for as long as necessary for the purposes for which the data is used under point 3 of this Statement.

Because the need to store data may vary by data type as well as by purpose of processing, actual retention periods can vary considerably. For example, you will understand that we keep certain personal data for a long time to ensure that you can provide proof for your diploma later in life (e.g. in the context of your pension).

We can inform you that we observe, among other things, the following criteria when determining the retention periods:

- How long are the personal data required to provide the requested service?
- Have we set and announced a specific retention period?
- Did we obtain permission for a longer retention period?
- Do we have a legal, contractual or similar obligation to keep the data?

As soon as your data is no longer required and we do not have a legal retention obligation, we will permanently delete it or, if this is not possible, make it anonymous in our systems.

However, your personal data will be retained and used for as long as it is necessary to comply with our legal obligations, to settle disputes or to enforce our agreements.

## **7.2. Contact details of alumni**

Only if you have given your consent, your contact details will be included in our alumni database after graduation in order to inform you about our activities. You can revoke your consent at any time.

## **8. How do we protect your personal data?**

Your personal data is considered strictly confidential. We take appropriate technical and organisational measures to protect the personal data provided and collected from destruction, loss, unintended modification, damage, accidental or unlawful access or any other unauthorized processing of personal data.

## **9. What are your rights and how can you exercise them?**

### **9.1. Your rights**

#### **9.1.1. *Right to access your personal data***

You always have the right to access your personal data that are processed by us. In this context, we will provide you with a free copy of this personal data if you so request.

### **9.1.2. *Right to improve your personal data***

You always have the right to correct or delete incorrect, incomplete, inappropriate or outdated personal data.

If you dispute the accuracy of the personal data, you may request a restriction of processing during a period that allows us to verify the accuracy of the personal data. Once you have obtained the right to restrict the processing, we will no longer carry out transactions with the relevant personal data, apart from storing the data.

### **9.1.3. *Right to revoke your consent***

If the processing is based on your consent, you have the right to revoke this consent at any time.

### **9.1.4. *Right to object to certain processing operations***

When your personal data is processed on the basis of a legitimate or public interest, you have the right to object to the processing of your personal data.

### **9.1.5. *Right to erase your personal data***

You have the right to obtain the deletion of your personal data without unreasonable delay in the following cases:

- your data is no longer required for the purposes for which it has been collected or processed; or
- you withdraw your consent and no other legal basis exists for processing; or
- you object to the processing and do not have prevailing compelling legitimate grounds for processing; or
- your data has been processed unlawfully; or
- your data must be deleted due to a legal obligation.

Study results are not deleted. In this way, in the case of loss of documents by you, we can deliver a certificate.

### **9.1.6. *Right to transfer personal data***

As regards the processing of your personal data on the basis of your consent or because this is necessary for the implementation of the agreement with you, you may ask us to forward your personal data – in a structured, common and digital form – so that you can store it for personal (re)use, or to forward this personal data directly to another data controller, as far as this is technically possible for us.

### **9.1.7. Right not to be subject to automated decision-making**

We will not subject you to automated individual decision-making, including profiling.

### **9.2. How to exercise?**

In order to exercise the aforementioned rights, you can make a written application to us in the following way:

- by email: [privacy@pxl.be](mailto:privacy@pxl.be);
- written to the following mailing address: Elfde Liniestraat 24, 3500 Hasselt, to the attention of the Data Protection Officer.

In exercising your right, we ask you to clearly indicate which right you wish to invoke and against which processing(s) you may oppose or what permission you wish to withdraw.

## **10. How can you submit questions or complaints?**

If you have a question or complaint about our processing of personal data, you can contact us through the following channels:

- by email: [privacy@pxl.be](mailto:privacy@pxl.be) ;
- written to the following mailing address: Elfde Liniestraat 24, 3500 Hasselt, to the attention of the Data Protection Officer.

If you are not satisfied with our reply, if you have any comments regarding the exercise of your rights or if you believe our processing of your personal data is not in line with the legislation, then you have the right to complain about this to the Data Protection Authority. All information can be found on <https://www.dataprotectionauthority.be/>

## **11. Modifications to this Statement**

This Declaration may be modified or supplemented by us if we deem it necessary.

If significant changes are made to this Statement, the date of update of the statement will be amended and we will also notify you through the normal information channels.

We also encourage you to periodically review this Statement to find out how we process and protect your personal data.