

## General information notice regarding the processing of students' personal data

### Why this notice?

This notice aims to provide general information on the processing of personal data carried out by the University of Namur concerning students who are registered or have applied for (re)registration.

### Why does UNamur process students' personal data?

The personal data provided by students or associated with their academic journey and the university services they benefit from are included in various automated data processing systems of the University of Namur asbl, rue de Bruxelles 61, 5000 Namur (UNamur).

These data are essential for the administrative and educational management of studies at UNamur. Their processing is based on the necessity to carry out the public interest mission of providing higher education and awarding diplomas entrusted to UNamur and to manage the services offered to students related to teaching activities and campus life, as well as maintaining a network with alumni.

They are mainly used for:

- The registration procedure (including account management on the registration platform, verification of access conditions to studies, control of the financial eligibility of registered students, and payment of registration fees);
- Management of the student's academic journey;
- Organization of teaching activities, admission, appeals and evaluation exams, and graduation;
- Management of access, use, and security of university resources (including IT and library resources) and services associated with the student card (including the internal payment solution at UNamur);
- Management of the provision of free educational materials as provided in Article 78 of the decree of 7 November 2013 defining the landscape of higher education and the academic organization of studies for eligible students;
- Organization of participatory elections within UNamur;
- Communication and information related to UNamur activities and events or those organized by UNamur in collaboration with external companies or partners, as well as internship and job opportunities;
- Management of activities and events organized at UNamur (including graduation ceremonies);
- Management of disciplinary matters;
- Management and maintenance of an alumni network after the student has left UNamur;
- Production of statistics related to education and reports requested by control bodies, public authorities, or bodies related to higher education;
- Provision of statistical indicators for decision-making by various University authorities related to university management;
- Management and evaluation of the quality of teaching, infrastructure, and services offered to students;
- Management of student activities and welcoming new students.

When a student uses services offered by UNamur related to social or financial aid, housing, sports, culture, catering, student mobility, psychological or educational support, support for students with disabilities or special needs, university IT services, libraries, the internal payment solution for copies at UNamur, or the UNamur career center, these services may have access to certain data to complete the information provided by the student and perform other data processing for the requested service. More specific information is provided, if applicable, at the time of data collection or on other information media specific to these services.

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UNamur also processes students' data to comply with legal requirements in data protection (including responding to the rights of data subjects).

Furthermore, as part of its public interest mission, UNamur reuses data for scientific research or statistical purposes in compliance with the conditions imposed by the applicable data protection regulations.

### What categories of data are processed?

The processed data mainly fall into the following categories:

#### General data

- Personal identification data including:
  - General identification data *[category including the following types of data: last name, first name, gender, preferred name, postal address, ID card copy, identity photograph, phone number, personal email address, and email address assigned by UNamur ...]*
  - Identifiers assigned by public authorities *[category including the following types of data: social security number/NISS, passport number, ID/residence card number, national register number, driving license number, vehicle registration plate ...]*
  - Identifiers assigned by UNamur *[category including the following types of data: student number, internal registration number, eID for access to internal resources, access card identifiers, student card number ...]*
- Personal characteristics data *[category including the following types of data: date of birth, gender, place of birth, marital status, nationality, residence status in Belgium, mother tongue, spoken languages ...]*
- Family situation data *[category including the following types of data: marital status, data related to parents, guardians, spouses, household composition, children ...]*
- Social data *[category including the following types of data: data related to the benefit of a study grant from the Wallonia-Brussels Federation, social aid from a public social action center ["CPAS" ...], family allowances, a scholarship from the University or another entity ...]*
- Data related to the proof of authorization or consent *[category including the following types of data: dates of authorization, subject ...]*

#### Registration data

- Data related to secondary education diploma, higher education diplomas, and activities prior to registration at the University of Namur *[category including the following types of data: results obtained, registration institutions, registration date, success certificates ...]*
- Data related to post-secondary activities *[category including the following types of data: language stay, internship, gap year, training ...]*
- Professional data *[category including the following types of data: data related to employment contracts or other sources of income ...]*
- Data included in documents submitted by the student to justify a request for exemption to an registration board (jury) *[category including the following types of data: type of absence reason, date ...]*
- Data related to the decision of a registration board (jury) on the authorization or conditions of registration
- Data related to the success of an inter-university competition or admission exam
- Data related to student and doctoral registrations *[category including the following types of data: data related to the registration file, lightening [1st & 2nd Cycle], study cycle of registration [1st & 2nd & 3rd cycle], joint degree, study code and study domain [1st & 2nd cycle & continuing education], academic grade code & habilitation [ARES], isolated courses, PAE credits [1st cycle & 2nd cycle & continuing education], "PAI" - individualized support program, types of bridge program, anticipated teaching units ["UEs" ...], recognition of prior learning & credits, granted exemptions, exam registrations, fraudulent student status, prerequisites such as mastery of the French language [exam date] ...]*

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- Financial data related to student and doctoral registrations *[category including the following types of data: data related to the payment of registration fees, granting of a study grant, financing plan for non-EU non-financeable students ...]*

### Data related to the academic journey and educational activities

- Data related to the student's academic and educational journey *[category including the following types of data: data related to the academic journey, student's annual program - followed teaching units -, grades, credits, mentions, obtained diplomas, country of diploma issuance, jury opinions, disciplinary decisions and appeals, final study work, completed internships ...]*
- Data related to student mobility *[category including the following types of data: data related to participation in a mobility program [category including the following types of data: Erasmus ...], dates, home or destination institution ...]*
- Data related to teaching and educational activities *[category including the following types of data: data related to the organization of work groups, formative activities, exams, course evaluations, tests proposed as part of success support, completed works ...]*
- Data related to students' specific needs *[category including the following types of data: data related to specific needs in the support file, support plan, granted accommodations ...]*
- Data related to evaluation results;
- Data included in documents submitted by the student to justify a cause of non-participation in an evaluation or mandatory educational activity *[category including the following types of data: type of absence reason, date ...]*
- Data related to the control of compliance with applicable student regulations, including plagiarism *[category including the following types of data: data related to the verification of the use of IT resources, compliance with regulations, copy analysis via anti-plagiarism software ...]*
- Data related to discipline *[category including the following types of data: data related to disciplinary measures/sanctions, facts leading to sanctions, procedure ...]*
- Data related to internships *[category including the following types of data: data related to the organization and purpose of the internship, date, place, reports ...]*

### Specific data for the PHD journey

- Data related to the PHD supervision *[category including the following types of data: PHD committee members ...]*
- Data related to the PHD subject
- Data related to affiliation with a faculty or department at UNamur or another university in case of co-supervision of the PHD
- Data related to registration in PHD schools
- Data related to co-supervision of the PHD agreements
- Data related to research valorisation *[category including the following types of data: data related to research contracts, publications by university community members, awarded prizes and rewards, participation in competitions, community services ...]*

### Data related to the provision and use of university services

- Data related to the use of library resources *[category including the following types of data: data related to access rights, borrowed books, borrowing and return dates ...]*
- Data related to the allocation and use of housing *[category including the following types of data: dates and purpose of housing allocation, incidents related to occupation or end of occupation ...]*
- Payment data *[category including the following types of data: data related to a transaction, amount, payment date, debtor, creditor, transaction purpose ...]*
- Data related to access and use of IT resources or digital applications used by UNamur *[category including the following types of data: data related to the use of communication tools [emails ...], use of WebCampus, Microsoft 365 products including Teams, use of storage tools in IT resources made available to the student [Virtual Office ...], connection data to UNamur IT resources via a student account ...]*
- Data related to granted IT access *[category including the following types of data: access and revocation dates, concerned resources ...]*

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- Authentication data [category including the following types of data: login, passwords, password modification date ...]
- Data related to an IT incident [category including the following types of data: data related to incidents related to the use of IT resources, incident date and time, nature of the incident, accountability ...]

UNamur retains the data for the necessary duration concerning the purposes for which they are processed, considering, if applicable, the rights of the data subjects, mandatory legal retention requirements, and the legal period during which UNamur's liability may be engaged.

### Where do the processed data come from?

The processed data are provided by students or generated during the student's journey or use of university resources.

The Minister of Security and Interior has authorized the Academy of Research and Higher Education ("ARES") to process certain data from the national register as an identification key and authentic data source, allowing the creation of a centralized database of registrations and the journey from the admission request to the diploma award for higher education students. This authorization benefits UNamur, which can therefore access the National Register data and request a "bis" register number - an identification number for foreign residents in Belgium - for students who do not have a National Register number.

Some data may be provided via the computerized and centralized data exchange platform related to admissions, registrations, and diplomas of higher education students in the French Community, named "e-paysage," administered by ARES and grouping access to data sources fed by higher education institutions and administration.

In the context of student mobility (including exchange programs), co-organization of a study program with another institution (leading to a joint degree or not), or, for PHD students, co-supervision of the PHD, or during internships, data related to the student may also be communicated by the partner or host institution of the intern.

Data is provided by the non-profit organisations CAPMG and CCFFMG for students on the Master's programme in General Medicine.

Where admission is subject to passing an entrance examination, data is provided by the institution organising that examination.

Furthermore, UNamur verifies if the student is entitled to request registration, which involves consulting the fraudster database managed by ARES and conducting other verifications with third parties.

### Who are the third parties to whom these data may be communicated?

The data are reserved for internal use by UNamur's duly authorized services and personnel.

UNamur uses external IT service providers for support and hosting services, who may therefore process student data, but only for the needs of the agreed services and under UNamur's instructions. It also offers students access to licensed Microsoft Office 365 products, which involves services and data hosting by Microsoft.

Furthermore, under Articles 106, 106/4, 106/5, and 106/7 of the decree of 7 November 2013 defining the landscape of higher education and the academic organization of studies, the personal data of each student whose registration is considered, including students regularly registered in full-time higher education, are transmitted to ARES, responsible for creating the 'e-paysage' platform. Additional information can be obtained at [vieprivee@ares-ac.be](mailto:vieprivee@ares-ac.be) or by consulting this site <https://www.mesetudes.be/de/enseignement-superieur/organisation-pratique/modalites-dinscription/e-paysage/> or on the data processing carried out in connection with this platform (ARES site <https://www.ares-ac.be/fr/vie-privee/e-paysage/>).

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Finally, data are also transmitted to third parties (administrations, government delegate, AEQES, other higher education institutions (e.g., in case of joint degree or participation in a mobility program, verification of the authenticity of produced documents, access to library resources or participation in doctoral schools organized by other universities), host institutions of internships, the non-profit organisations CAPMG and CCFFMG (which organise general practitioners' internships), General Assembly of Students ("AGE"), to the extent that:

- This transmission is necessary for the realization of the processing activity's purposes, particularly within the framework of the University's public interest missions;
- UNamur is legally obliged to do so;
- The student has consented to their data being communicated to a third party;
- UNamur complies with a request from a legally authorized third party to request the communication of these data;
- UNamur is requested to transmit data for statistical or scientific purposes with appropriate guarantees;
- The data transfer is necessary for the legitimate interests pursued by UNamur or a third party, in compliance with legal conditions.

The data are not transmitted outside the European Union territory except in specific cases where this transfer is necessary for the realization of the public interest mission (e.g., in case of student mobility outside the EU as part of their study program or co-supervision of a thesis involving a partner institution located outside the EU, or for the verification of documents issued by institutions or employers located outside the EU). If the student has consented when submitting their registration request, their admission letter may also be transmitted to a diplomatic post to facilitate their student VISA application.

Depending on the country concerned and the context of the transfer, the transfer may, for example, be based on the following grounds and safeguards:

- The transfer is made to one of the countries recognised by the European Commission as offering an adequate level of protection;
- is necessary for the conclusion or performance of a contract concluded in the interests of the data subject between the University and another natural or legal person;
- The transfer is necessary for the performance of a contract between the individual and the University or for the implementation of pre-contractual measures taken at the request of the data subject.

Furthermore, if UNamur uses digital services that involve the transfer of data outside the EU, such transfers are subject to at least one of the following safeguards:

- The transfer is made to one of the countries recognised by the European Commission as offering an adequate level of protection, or is carried out to a company established in the United States under the EU-US Data Privacy Framework;
- The transfer is governed by the standard contractual clauses adopted by the European Commission.

Data related to student registration and journey are transmitted to inter-university consultation bodies:

- CRef for scientific or statistical purposes (for more information on the data collected by CRef from universities, see the CRef website: <http://www.cref.be/legal/chartevieprivee.pdf>);
- ARES for statistical purposes and for the realization of ARES missions (for more information on the data processing carried out by ARES, see: <https://www.ares-ac.be/fr/vie-privee>).

**For more information:** For more information on the processing of your data and your rights, you can consult <https://www.unamur.be/en/privacy-policy>. UNamur has appointed a Data Protection Officer who can be contacted for additional information or to exercise your rights ([dpo@unamur.be](mailto:dpo@unamur.be)).