



isaac newton

Privacy Policy

W.S.G. Isaac Newton, study  
association Mechanical  
Engineering at the University of  
Twente

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Controller: The board of Isaac Newton

Version: 1.0

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## 1 INTRODUCTION

This is the privacy statement of Isaac Newton, study association for mechanical engineering at the University of Twente. In this document, there is a statement on which data shall be saved or processed by Isaac Newton and how Isaac Newton processes this saved data.

This is all documented in agreement with the Algemene Verordening Gegevensbescherming (AVG).

## 2 DESCRIPTION OF THE DATA PROCESSING

### 2.1 DESCRIPTION PROCESS

The data from the membership administration, the data saved on the Newton server and the saved pictures will be used to facilitate activities (lunch lectures, drinks, excursions, study tours and courses) organised by Isaac Newton at which the member participates. Furthermore, the contact details will be used for postal and e-mail contact between Isaac Newton and the member. The bank details will be used in order to collect the contribution, the participant costs of activities and any purchases made via the 'Newtonshop' or the website.

### 2.2 GOAL

Data from the members administration will be used to facilitate activities organised by Isaac Newton, the postal and e-mail contact between Isaac Newton and the member and the collecting of contribution, participant costs for activities and any purchases at Isaac Newton.

### 2.3 LEGAL BASES

In the following chapters a full overview is given of which processing activities of Isaac Newton. Next to the processing activity and a (short) explanation to it, there will also be a mention (or multiple) of legal basis (or legal bases) (a, b, c, d, e or f) on which the processing activity is based. These legal bases come from the AVG. A short overview of these legal bases is stated below.

**a.** the data subject has given consent to the processing of his or her personal data for one or more specific purposes;

*It is allowed to process personal data if the person in question has given consent. This legal basis is used by Isaac Newton when the data is used to improve the quality of our services, but is not essential to offering this service.*

**b.** processing is necessary for compliance with a legal obligation to which the controller is subject; *This legal basis means that Isaac Newton is allowed to process personal data if this is necessary in order to complete the agreement. An example of this would be the membership agreement or the direct debit agreement.*

**c.** the processing is necessary to meet the legal obligation that is put upon the controller; *Isaac Newton will process data in the event that Isaac Newton has the legal obligation to do so.*

d. –

*(If the life of a member or other persons are depending on the processing of personal data, it is allowed for the purpose of aid. This legal basis is not used by Isaac Newton.)*

e. –

*(This legal basis is meant for the government agencies and can never be used by Isaac Newton)*

f. processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

*This legal ground means that Isaac Newton can process data if there is a legitimate goal to do so, the processing of this data is necessary in order to reach the goal and the interests of the member do not weigh heavier than the interests of Isaac Newton. Isaac Newton has to stop the processing as soon as the person in question objects. If Isaac Newton can prove that the interests of the association weigh heavier than the interests of the member, the processing can be continued.*

### 2.3.1 PERMISSION

At the moment of subscription of a member, on the (online) subscription form, the possibility without obligation is given to permit the processing of data that will be used on basis of legal ground

a. The permission that is being given, is in agreement with the in this document stated processing goals, as mentioned in chapter 2.4.

The permission will be documented by the checking of a checkbox during the subscription process of new members. A new member must check these checkboxes themselves during the subscription process. This permission can at all times be withdrawn on the website of Isaac Newton.

### 2.4 CONCERNED DATA

The beneath stated data can be documented in the members administration. These data will be gathered by the filling in of the data by the (aspiring-)member. The data that is mandatory to become a member at Isaac Newton will be denoted with an asterisk (\*). Underneath all data, an explanation is given as to why they are documented in the members administration.

- Date of subscription of the member\*
  - *Legal basis b, minimal operation of memberships agreement*  
In order to monitor the beginning of the contribution
- Initials, first name and last name\*
  - *Legal basis b, minimal operation of memberships agreement*  
The initials, first and last name are necessary for the identification of an individual member in matters such as (book)sales and activities.
  - *Legal basis f, advanced subscription to activities*  
The first and last name will be displayed at the sign ups of an activity on the website of Isaac Newton.
  - *Legal basis a, birthday related activities*  
The first and last name will be displayed on the birthday of the member on the screen in the room occupied by Isaac Newton if permission has been given for this.  
*Legal basis b, Activities Mens and Introweek VU*  
The members that study at the VU have the introweek together with studievereniging Mens. The name will be shared with the studievereniging Mens, if

the member participates in the introweek or in the activities organised in cooperation with study association Mens.

- *Legal basis a, physical publication of the almanac*  
The first and last name will be in the physical publication of the almanac if the student has given consent.
- Date of birth
  - *Legal basis c, compliance of alcohol regulations*  
The date of birth will be used to check if the member is 18 years old and if he is therefore allowed to drink alcoholic beverages in the bar.
  - *Legal basis f, 18- list bar personnel*  
The date of birth will be used to make a list for the bar personnel of minors, this will make the bar personnel more aware of minors. This is in addition to checking ID's.
  - *Legal basis a, birthday related activities*  
Isaac Newton shows the first and last names of the members on the screen in the Newton room if the member has given permission to do so.
  - *Legal basis b, activities Mens and introweek VU*  
The members who study at the VU have the option to participate in the introweek with the studievereniging Mens. The date of birth will be shared with the studievereniging Mens, if the member partakes in the introweek or an activity organised in cooperation with studievereniging Mens, in case this is necessary for the activity.
- Gender
  - *Legal basis a, voluntary registration for gender participation*  
The gender of a member is used with the goal to monitor the participation of different genders and where necessary for the improvement of a specific policy.
- Student number for the University of Twente\*
  - *Legal basis f, minimal operation of the website of Isaac Newton*  
Student numbers are used as usernames to log in to the website and the computers in the room occupied by Isaac Newton.
  - *Legal basis b, minimal operation payment collection agreement*  
The student number is used as a reference number for collections executed on the basis of the contribution, participation contribution for activities of Isaac Newton and purchases from the Newtonshop.
  - *Legal basis b, minimal operation memberships agreement*  
The student number is used to monitor if a member is already graduated. When the member is graduated, their membership will be resigned.
- E-mail address\*
  - *Legal basis b, minimal operation memberships agreement*  
The e-mail address is used as a primary means of communication from Isaac Newton to a member. For the administration, notifications from the website such as the resetting of the password will be sent to the e-mail address. Furthermore the collection of money will be announced via this means of communication.
  - *Legal basis b, activities Mens and introweek VU*  
The members that study at the VU have an introweek in cooperation with studievereniging Mens. The e-mail address will be shared with studievereniging Mens if the member partakes in the introweek or an activity organised in cooperation with studievereniging Mens.

- *Legal basis a, information mailing and side activities*  
 Affairs such as the associationmail, mailings for which the member has subscribed, information on activities for which the member in question has subscribed.  
 The mailing for which the member can subscribe themselves are:
  - Information mailings on drinks
  - Information mailings on excursions
  - The Green Team Newsletter
  - Information mailings on the master shadowing days
  - Information mailings on receiving merchandise
  - Information mailings on companies
  - Notifications on sign ups by the member
  - Notifications on reactions on comments made by the member
- Mobile phone number
  - *Legal basis a, voluntary registration contact details*  
 The mobile phone number is necessary in the case that sudden and direct contact has to be made to the member. Furthermore, will the mobile phone number be used to sustain good communication with committees. Registration of the phone number is voluntary.
  - *Legal basis a, receiving of text messages*  
 A member can indicate if they want to receive text messages. Only when a person explicitly indicates to want to receive text messages will this be done.
- Home phone number
  - *Legal basis a, voluntary registration contact details*  
 The home phone number serves as a back-up for the mobile phone number in case of sudden and direct contact with the member is needed. Registration of a home phone number is voluntary
- Address\*
  - *Legal basis f, paper communication*  
 Adresses are necessary for the communication with the member by paper. Isaac Newton sends out the association magazine de Appel to the members and with Christmas and new year a card will be sent to the member.
  - *Legal basis a, activities Mens and introweek VU*  
 The members that study at the VU have an introweek in cooperation with studievereniging Mens. The address will be shared with studievereniging Mens if agreed upon by the member and is partaking in the introweek or an activity organised in cooperation with studievereniging Mens, if necessary for the activity.
  - *Legal basis b, sending a reminder of payment*  
 When a member does not pay their invoices Isaac Newton will send them a reminder of payment(dutch: aanmaning).
- Bank details
  - *Legal basis b, minimal operation payment collection agreement*  
 The IBAN-number and possibly the BIC-number are necessary for the payment collections, which are executed in combination with the SEPA-authorization. Signing the SEPA-authorization is highly recommended when becoming a member, since it is needed to make purchases in the Newtonshop and possibly to sign up for an activity.
- Payment collection, collection instructions and chargebacks
  - *Legal basis b, minimal operation payment collection agreement*

In order to execute the collections and keeping track of our financial administration, Isaac Newton saves all collections, collection instruction(s) (regulations on the collection), and chargebacks of transaction in our database. This data is needed for the correct financial handling of our payment collection agreement. The executed collections, instructions and chargebacks will be kept until 7 years after execution in our database, conforming to the Algemene Wet Inzage Rijksbelastingen (General Law on State Taxes).

- Study\*
  - *Legal basis f, profiling on basis of studies*  
To provide better targeted communication from Isaac Newton to the different target groups, the phase of the study in which the member is, will be saved. A choice can be made between 'Bachelor Mechanical Engineering', 'Bachelor Mechanical Engineering – Amsterdam', 'Pre-master Mechanical Engineering', 'Pre-master Sustainable Energy Technology', 'Master Sustainable Energy Technology', 'Master Mechanical Engineering (1 year)', 'Master Mechanical Engineering (2 years)' and 'Other study'.
- Internationality
  - *Legal basis a, voluntary registration internationality*  
Within Isaac Newton the international background of a member is tracked, with as goal to anonymously monitor the participation of international members and, where needed to improve by specific policy. Registration of internationality is in all cases voluntary.
- It is monitored in which 'groups' the member is active. These 'groups' can be a board, a committee or an old board.
  - *Legal basis f, announcing committee members*  
These groups are used to announce the committees, board and old boards on the website, so that it can be communicated who are part of these groups. This is done to communicate to the members or externals who are responsible for particular affairs within a board, committee or old board. These groups are also used to facilitate communication from the board to the committee or old board in question.
- It is monitored at which activities a member was present or will be present.
  - *Legal basis b, minimal operation payment collection agreement*  
The activity overview per member is tracked so that a member themselves and the board can see at which activities the member was present. These overviews will also be used when a payment collection is made for the member as some activities have a cost attached to them.
  - *Legal basis f, feedback activities*  
The activity overview is used by the board to ask for feedback from the present members for some activities.
- It is monitored what expenses are made by the member.
  - *Legal basis b, minimal operation payment collection agreement*  
For all members, the expenses will be monitored in order to make sure all members are presented the correct invoice for the expenses made for activities and purchases in the Newtonshop. In this way, the member can see which expenses they have made and which amount is collected with the next collection moment.
- One of the member's ID of a registered NFC-chip.
  - *Legal basis a, voluntary registration data*

If the member so pleases to register an NFC-chip, for example the one in their student card, it is possible to log in to the touchscreen for the Newtonshop. The data of the NFC-chip will be saved to register a purchase or to be able to sign up to an activity via the touchscreen. Registration of an NFC-chip is voluntary.

- Committee and (old) board pictures
  - *Legal basis f, recognizability committee members and (old-)board members*  
In case the member is part of a committee or (old)board, a group picture of the committee of (old)board will be uploaded onto the website of Isaac Newton with a mention of the names of the committee members or (old)board members.
- Retention period of data
  - *Legal ground a, extension retention period for former board members*  
The information of (former) board members will be retained for longer if they grant permission for it, so they can be invited for the quinquennium and constitution drink of Isaac Newton.
- Profile picture of the member
  - *Legal ground a, voluntary registration of data*  
The member has the option to add a profile picture to their account. This picture will be visible in the online almanac if the member has granted permission for it to be visible in the online almanac.
- Photos of a member during an activity
  - *Legal ground f, promotion for the association*  
Isaac Newton takes pictures of the member during activities of Isaac Newton and places these pictures on the social media channels of Isaac Newton in order to profile the association and to arouse interest in members for upcoming activities.
  - *Legal ground f, giving members an impression of how our activities are*  
Isaac Newton takes photos of the member during activities of Isaac Newton and places these photos on the website of Isaac Newton in order to show members how our activities are.
- Being visible in the online almanac
  - *Legal ground a, being visible in the online almanac*  
The member has the option to indicate whether they wish to be visible in the online almanac and which details should be visible. The member can choose to have their address, phone number, e-mail address, date of birth and/or additional information visible. Only when the member explicitly indicates their wish to have their details visible and has specified which details should be visible in the online almanac, those details will be visible.
- Being visible on the screen in the Newton room on the members birthday
  - *Legal ground a, being visible on the screen in the Newton room on the birthday of the member*  
A member can indicate whether they want their name to be shown on the screen in the Newton room. Only when explicit permission has been granted by the member for their name being shown on the screen will this be the case.
- Being tagged in photos
  - *Legal ground a, being tagged in photos*  
A member can indicate whether they want to be tagged in photos of activities that have been placed on the website. Only when explicit permission has been granted by the member for being tagged on photos on the website will this be the case.



- Being placed in the publication of the almanac
  - *Legal ground a, being placed in the publication of the almanac*  
A member can indicate whether they would like to be placed in the almanac. Only when explicit permission has been granted by the member to be placed in the almanac will this be the case. In the almanac a photo, the name and the year in which the member started their study will be showcased. The photo will be requested from Osiris when permission for this has been granted by the member.
- Placing the profile picture of the member on the website of a study trip
  - *Legal ground a, placing the profile picture of the member on the website of the study trip*  
When a study trip is organized a photo of the participant will be publicly published on the website of the study trip when permission has been granted by the member.

## 2.5 FACILITATION OF DATA

For certain cases data will be facilitated to internal and external parties, which will be clarified in this chapter.

### 2.5.1 INTERNAL

Within the association the necessary data will be facilitated to the board and committees. The exact data that will be facilitated will be different per board/committee and per activity. The data will be provided with the goal of tuning the activities to the participants and to draw up participant lists. The data will also be facilitated if this is essential for the functioning of the committee.

### 2.5.2 EXTERNAL

Certain data will be facilitated to external parties, in order to facilitate several services. Below an overview of external parties within the EU/EER and the aim of facilitating the data is presented.

- Congressus
  - Congressus delivers the online software and webservice in which the members administration is saved. This means that a constant exchange of data takes place. The board of Isaac Newton has struck a data processing agreement with Congressus in which the (privacy) rights and obligations Isaac Newton and Congressus have are stated. Through Congressus mailings and invoices are also drafted.
- Drukbedrijf.nl B.V.
  - Drukbedrijf.nl B.V. is the company that prints and sends the association magazine de Appel. For sending de Appel, Drukbedrijf.nl B.V. needs the first name, last name and address of a member who receives de Appel. The board of Isaac Newton has a processor agreement with Drukbedrijf.nl B.V. in which is stated what (privacy) rights and duties Isaac Newton and Drukbedrijf.nl B.V. have.
- Google
  - Committees of Isaac Newton work with agendas, minutes and data of activities which they share via Google Drive. Furthermore, the board of Isaac Newton utilizes facilities of Google such as Gmail and Google Calendar. The board of Isaac Newton has agreed with the DPA by Google in which is stated which (privacy) rights and duties Isaac Newton and Google have.
- Studievereniging Mens

- For the introweeks and activities the board of Isaac Newton will share the names and addresses of the Mechanical Engineering students at the VU if permission has been granted and they are participating in the introweek or activity. The board of Isaac Newton has made a processor agreement with studievereniging Mens in which is stated what (privacy) rights and duties Isaac Newton and studievereniging Mens have.
- University of Twente
  - Every quarter year, the graduated students will be requested by Isaac Newton with which the members administration will be updated. After the administration has been updated, Isaac Newton will delete this data. Furthermore, the profile pictures on Osiris will be requested for the almanac in case that the member has given permission.

## 3 ORGANISATION OF THE PROCESSING

### 3.1 SECURITY MEASURES

The technical security of the members administration mainly lies with Congressus. Congressus utilizes redundant servers, role based servers, redundant firewalls and full disk encryption. The details of the security measures are visible in the processor agreement between Isaac Newton and Congressus.

The access given to the data lies with the board of Isaac Newton. The board of Isaac Newton have the credentials to look into the members administration and manage the data. Furthermore, the system administrator, in the form of the CompuCie, has access to the back-end of Congressus to connect these systems to, for example, the website or Newtonshop. This makes it so that also the system administrator has access to the members administration.

Next to this, committee files and data are being processed on the storage system for files of Isaac Newton. The computers situated in the rooms occupied by Isaac Newton give access to the respective files to all committee members on this storage disk. The board and system administrator have access to all files on this storage disk. The data is protected with the usage rights management and the firewall of Windows Server. External computers, via Windows filesharing, can gain access if they are connected with the university network, which is also possible by using the university VPN. With this any committee can only access their respective files, the board can access the board folder and all committee folders and the system administrator has access to all (hidden) folders.

### 3.2 RIGHTS OF THE PERSONS IN QUESTION

Within the AVG, there are multiple rights stated for the data provider. It concerns article 15 through 22 of the AVG, These articles will be explained briefly for each right. In this chapter the applications and execution of all rights will be explained.

#### 3.2.1 RIGHT OF ACCESS

A member has the right at all times to gain access according to article 15 of the AVG. Within this article it is stated that a member gets the right to gain access to: the goal of the processing, the categories of personal data that has to be processed, the receivers of the personal data, for how long the data will be stored, in the case that data is not received by the member it will be given from which source the data it is. Access into the data is obtainable on the website of Isaac Newton and access to the processing goals is obtainable by requesting access with the board (for contact details, see 3.5). After requesting access, the board will grant access within 1 month of the request.

### 3.2.2 RIGHT OF RECTIFICATION

A member has the right of rectification of wrong personal data according to article 16 of the AVG. A member can change their own personal data in the members administration via the website of Isaac Newton or a request a rectification of the data by the board.

### 3.2.3 RIGHT OF DATA CLEARANCE

A member has the right to let their data be removed when the data is not necessary anymore for the goal for which it had been stored, when the member resigns their permission and there is no legal basis for the data or when the data is processed unlawfully according to article 17 of the AVG. When a person involved wants to have their data removed they can request to do so with the secretary of Isaac Newton. The secretary will look into the request and respond within 1 month. In the case that a (contribution) collection has to be made, the needed data will be stored temporarily. When such a collection does not have to be made, the data will permanently be removed.

### 3.2.4 RIGHT TO LIMIT PROCESSING

According to article 18 of the AVG, a member has the right to limit the processing of their data when the accuracy of the personal data is questioned, when the processing is unlawful and the member does not want the data removed, or when the member objects the legal basis of the processing. When a person in question wants to limit their data processing, a request can be made with the board of Isaac Newton. The board of Isaac Newton will look into the request and respond within 1 month.

### 3.2.5 NOTIFICATION OBLIGATION

According to article 19 of the AVG, the board is obligated to notify all recipients of the personal data in case of rectification, removal or a constraint is applied.

### 3.2.6 RIGHT OF TRANSFERABILITY OF DATA

According to article 20 of the AVG, a member has the right to request their data with Isaac Newton. The person in question is able to request their data on the website of Isaac Newton. Here, all data which are or could be processed will be visible. Furthermore an Excel-export of all data which is known to Isaac Newton can be requested from the board of Isaac Newton.

### 3.2.7 RIGHT OF OBJECTION

According to article 21 of the AVG, a member has the right to object, with arguments based on their situation, against processing on the basis of legal basis *f*. In case this happens, Isaac Newton either has to stop the processing of data for this person or present compelling arguments which weigh heavier than the arguments of the person in question. Furthermore everybody has the right to object against the processing of their personal data for direct marketing. In case this happens, Isaac Newton has to discontinue the processing of this data for direct marketing. A member can also object with the Personal Data Authority (Autoriteit Persoonsgegevens).

## 3.3 PERIOD OF STORAGE

Memberships data will not be directly deleted from the database when a request for cancellation of the membership is made. As stated in the Statutes of Isaac Newton article 6, section 1, the member must pay their full yearly contribution, even if the membership is cancelled in the span of the year. This makes it so that the data of the member have to be stored until the end of the collection moment. Afterwards, the member will be removed, unless the member is an old board member and has given permission to the storage of the data. The payment collections will be stored until a member has not been a member for 7 years, the lawful period with regards to the tax authorities. After this period, the member will be permanently be removed from the database.

### 3.4 DATA LEAKS

When a harmful data leak takes place, the board of Isaac Newton will inform the authority of personal data about the leak within the, by the AVG determined, term of 72 hours of noticing the leak. In the meantime the board, possibly with the help of the system administrator, will investigate any concerned external parties where the leak could have happened and how a comparable leak can be prevented in the future. When a member suspects a leak, they can contact the board with the contact details in 3.5.

### 3.5 CONTACT DETAILS

The holder of the members administration is:

Isaac Newton, Study association of Mechanical Engineering at the University of Twente

Horst C.030, Mailbox 217, 7500 AE Enschede

Isaac Newton is reachable by phone at +31(0)53 489 2531 and by e-mail at [board@isaacnewton.nl](mailto:board@isaacnewton.nl).

The functional management of the members administration is in the hands of the board of Isaac Newton.

The functional management of the website [www.isaacnewton.utwente.nl](http://www.isaacnewton.utwente.nl) is in the hands of Congressus, with which the board of Isaac Newton is responsible for the content of the website.

The technical management of the members administration is shared between the board of Isaac Newton and the system administrator, in the form of the CompuCie.

The technical management of the website [www.isaacnewton.utwente.nl](http://www.isaacnewton.utwente.nl) is in the hands of Congressus, the board of Isaac Newton and the system administrator, in the form of the CompuCie, with which the technical management by the board of Isaac Newton and the system administrator is limited to the possibilities that the back-end of Congressus is offering.

## 4 ABBREVIATIONS

AVG	Algemene Verordening Gegevensbescherming (General Data Protection Regulation (GDPR))
PIA	Privacy Impact Analyse (privacy impact assessment)
Newtonshop	The salespoint of candy, soft drinks, and miscellaneous products in the Newton room where one can also sign up for activities, or online where merch can be bought.