# INFORMATION NOTICE ON THE PROTECTION OF PERSONAL DATA OF ARCHIVE AND LIBRARY USERS

*Information required by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data: General Data Protection Regulation, hereafter ‘GDPR’.*

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This notice provides information on how the Université Libre de Bruxelles—hereafter ‘the University’—, acting as the ‘data controller’, processes the personal data it collects from users of its archives and libraries—hereafter ‘the Reader’.

These personal data are processed as required to manage the Readers’ status within the University and the legal relationship between Readers and the University, based on the performance of the contract signed between them.

The Reader’s personal data are processed in strict compliance with the GDPR. All necessary organisational and technical measures are taken to ensure data security. In addition, personal data are not retained longer than required for their processing according to their purpose.

# DATA CONTROLLER

The data controller is the Université Libre de Bruxelles, whose head office is located at 50 avenue Franklin Roosevelt, 1050 Brussels, registered with the Register of Legal Persons under number 0407.626.464.

# DATA PROCESSED AND PURPOSE OF PROCESSING

The following data are collected for the purposes specified.

# 2.1 GENERAL IDENTIFYING DATA

* 1. Surname
	2. First name
	3. Domicile or residence
	4. Telephone number
	5. Personal and, if applicable, ULB e-mail address
	6. Status within the University, faculty and ULB number, or status outside the University
	7. Reader number and passport photograph
	8. PIN: secret code automatically generated by the system, enabling the Reader to view their account and renew their loans online, use the automatic check-out kiosk, and connect to the internet using the terminals in the libraries.

## Data referred to in section 2.1 – Purpose of processing

The data are collected and processed for the general purposes of administering the Reader and managing the libraries, in order to:

1. guarantee that the Reader is properly identified in order to manage their account;
2. track the Reader’s status in management systems or applications used in the libraries, and allow the Reader to access them;
3. enable the University to contact the Reader in order to manage its relationship with them;
4. resolve disputes;
5. all other purposes specified in this notice.

# 2.2 DATA RELATED TO TRANSACTIONS BETWEEN READERS AND LIBRARIES

1. Books borrowed, with the dates of borrowing and return;
2. For books that are not in open access and must be read on site (with special permission), date of the request for access and date of access;
3. Late returns;
4. List of paid and unpaid fines, and reason for each fine;
5. List of reserved books.

## Data referred to in section 2.2 – Purpose of processing

* Enable the optimal management of the services offered to the Reader by libraries, and monitoring of the Reader’s compliance with loan and browsing rules;
* Enable the use of specific applications dedicated to managing the libraries and to which the University has subscribed, and enable Readers to access them.

# FURTHER PURPOSES

The general identification data collected by the University and referred to in sections 2.1 and 2.2 above may be processed for other purposes that must be compatible with those that initially justified collecting the data, such as to support academic, scientific, cultural, and social activities and events organised or supported by the University, and to give the Reader information about these activities using direct communication channels.

# SHARING DATA WITH THIRD PARTIES

The University shares data with its subcontractors, to the extent strictly required for the use of new or existing management systems or applications that are specific to the University’s libraries and to which it has subscribed, and in order to enable Readers to access them. The list of third-party companies with which data is shared, as well as their area of activity, the type of data, the purpose of the sharing, and—if applicable—the country in which the data are stored, is provided in the appendix to this document. Certain subcontractors are based outside the European Union. In this case, data are only transferred if appropriate measures as laid down in the GDPR are taken.

Appendix 1 to the information notices regarding the protection of personal data provides a list of third-party companies with which data related to the Reader are shared.

# STAFF AUTHORISED TO ACCESS AND PROCESS DATA

The data referred to above are accessible only to members of the department of libraries and scientific information, strictly to the extent required to the accomplishment of their tasks, and to employees of third-party companies with which the data are shared as part of a subcontracting agreement as mentioned in section 4 above.

Staff members are bound by confidentiality rules regarding all personal data processed by the libraries. This means:

* they must not access or attempt to access data that are not strictly required for the accomplishment of their tasks;
* they must not divulge the data they access, except as required by their function.

Employees of subcontractors, if applicable, are bound by the same rules.

# LENGTH OF DATA RETENTION

The length of retention of general identification data and of data related to transactions referred to in section 2 is as follows:

* ULB students: data are retained for as long as the student is enrolled in the University;
* ULB staff members: data are retained for as long as the staff member is working at the University;
* non-ULB Readers: data are retained for as long as the Reader is registered with the libraries;

The data may be retained longer than the periods referred to in this notice in the event of a disagreement between the University and the Reader regarding their respective obligations. In this case, the relevant data shall be retained until the disagreement is resolved.

# READERS RIGHTS AND RELEVANT CONTACT PERSON

All Readers of the University’s libraries is entitled, provided they show proof of their identity:

* 1. obtain a free copy of all their personal data processed by the University and, if applicable, all information available regarding its origin, destination, and purpose;
	2. rectify, at no expense, any inaccuracy in their personal data, and add to any incomplete data;
	3. have their personal data erased, at no expense and subject to regulatory requirements;
	4. have the processing of their personal data restricted, at no expense and subject to regulatory requirements;
	5. obtain, at no expense, a copy of their personal data they have provided to ULB, in a structured and commonly used format, provided the processing is based on consent or a contract and is carried out automatically;
	6. oppose the processing of their personal data, at no expense, subject to regulatory requirements, and for reasons related to their particular situation;
	7. appeal to the Data Protection Authority (<https://www.dataprotectionauthority.be/>, contact(at)apd-gba.be).

The conditions under which the rights referred to in paragraphs c, d, and f above may be exercised are described in Appendix 2.

These rights may be exercised by sending an e-mail or a signed and dated letter to the University’s Data Protection Officer, avenue Roosevelt 50, 1050 Brussels, CP 130,

rgpd@ulb.ac.be. In accordance with the law, a response will be provided within 30 days of the request being made.

Appendix 2: rights subject to conditions

Right to erasure (article 17 of the GPDR)

A person may exercise their right to erase their personal data if:

* the personal data are no longer necessary in relation to the purposes for which they were collected;
* the data subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
* the data subject objects to the processing and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing for direct marketing purposes;
* the personal data have been unlawfully processed;
* the personal data must be erased for compliance with a legal obligation in Union or Belgian law;
* the personal data have been collected in relation to the offer of information society services.

Right to restriction (article 18 of the GPDR)

A person may exercise their right to restrict the processing of their personal data if:

* the accuracy of the personal data is contested by the data subject, for a period enabling the University to verify the accuracy of the personal data;
* the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
* the University no longer needs the personal data for the purposes of the processing, but they are still required by the data subject for the establishment, exercise, or defence of legal claims;
* the data subject has objected to processing pursuant, pending the verification whether the legitimate grounds of the University override those of the data subject.

Right to object (article 21 of the GPDR)

The data subject shall have the right to object, on grounds relating to his or her particular situation, to processing of personal data concerning them which is based on consent or legitimate interest, unless the University demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or for the establishment, exercise, or defence of legal claims.