# INFORMATION NOTICE ON THE PROTECTION OF THE PERSONAL DATA OF ENROLLED OR ENROLLING STUDENTS

*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’.*

1. [DATA CONTROLLER 2](#_TOC_250015)
2. [DATA PROCESSED, PURPOSE OF PROCESSING, AND LENGTH OF DATA RETENTION 2](#_TOC_250014)
	1. [GENERAL IDENTIFICATION DATA 2](#_TOC_250013)
	2. [DATA RELATED TO THE STUDENT’S STATUS IN BELGIUM 3](#_TOC_250012)
	3. [DATA RELATED TO THE STUDENT’S EDUCATIONAL AND ACADEMIC RECORD 4](#_TOC_250011)
		1. Data related to the student’s educational and academic record

outside of the University 4

* + 1. Data related to the student’s academic record within

the University 4

* + 1. [Data related to specific student support programmes 5](#_TOC_250010)
		2. [Data related to the student’s specific needs 6](#_TOC_250009)
	1. [DATA RELATED TO THE PAYMENT OF TUITION FEES 6](#_TOC_250008)
	2. [MEDICAL DATA 7](#_TOC_250007)
	3. [SOCIAL DATA 7](#_TOC_250006)
	4. DATA RELATED TO THE STUDENT’S HOUSING IN

A UNIVERSITY HALL OF RESIDENCE 8

1. [FURTHER PURPOSES 8](#_TOC_250005)
2. [SHARING DATA WITH THIRD PARTIES 8](#_TOC_250004)
3. [STAFF AUTHORISED TO ACCESS AND PROCESS DATA 9](#_TOC_250003)
4. [LENGTH OF DATA RETENTION 9](#_TOC_250002)
5. [CONSENT FOR OTHER PURPOSES 10](#_TOC_250001)
6. [RIGHTS OF THE STUDENT AND RELEVANT CONTACT PERSON 10](#_TOC_250000)

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 enrolled or enrolling students—hereafter ‘the Student’.

These personal data are processed by the University as required to manage the Student’s academic record and relationship with the University, based on:

1. the contract between the Student and the University;
2. the Student’s statutory obligations;
3. the Student’s legitimate interests. In this context, the data will be processed for the following purposes:
	1. manage the Student’s participation in the University’s various bodies;
	2. enable the use of existing and new management systems or applications to which the University has subscribed;
	3. improve the quality of the University’s teaching activities, by developing indicators and statistics;
	4. produce statistics related to secondary schools that students have attended before enrolling at the University, in accordance with the University’s information policy regarding its educational offering;
	5. maintain a network of alumni and former students.

The Student’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 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, PURPOSE OF THE PROCESSING, AND LENGTH OF DATA RETENTION

The following data are collected for the purposes specified and retained for the lengths specified.

# 2.1 GENERAL IDENTIFICATION DATA

* 1. Surname
	2. Given name
	3. Domicile and residence
	4. Telephone number
	5. Personal and ULB e-mail addresses
	6. Sex
	7. Date and place of birth
	8. Marital status
	9. Nationality
	10. Passport photograph
	11. ULB student number, as soon as it is available (as well as the temporary number given previously)

## Purposes of the processing

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

1. ensure that the Student is properly identified when managing their case, and allow the production of official documents about them;
2. enable the University to contact the Student in order to manage its relationship with them;
3. ensure that the Student is included in the university community for the purposes of management systems or applications, and enable the Student to access them;
4. maintain voter registers and organise elections within the University;
5. administer decision-making and participatory bodies, including legal bodies;
6. resolve disputes;
7. maintain a network of alumni and former students;
8. manage buildings, offices, and campus safety;
9. ensure psycho-medical prevention and support;
10. keep records of student clubs and associations, and manage their activities on campus;
11. manage socio-cultural events on campus;
12. carry out other tasks specified below.

## Length of data retention

The general identification data referred to in section 2.1 are retained for an unlimited duration, in order to:

1. print or reprint diplomas, titles, ranks, certificates, and transcripts delivered by the University, and organise tests and examinations;
2. certify that the Student has studied at the University, in the event that their diplomas or certificates proving their studies are lost or destroyed;
3. check that students who wish to re-enrol fulfil the related requirements;
4. maintain the network of alumni and former students.

# DATA RELATED TO THE STUDENT’S STATUS IN BELGIUM

Data related to the status of a foreign or stateless Student in Belgium may be required: status of refugee, length and nature of the stay in Belgium, and nationality and address of parents if applicable.

## Purpose of processing

The data are collected and processed in order to determine what—possibly specific—funding the Student should receive, defined either by international agreements or by the University’s own regulations, and determine what tuition fees may be asked from the Student.

## Length of data retention

The data are retained for an unlimited duration in order to:

* check that students who wish to re-enrol fulfil the requirements;
* ensure proper billing;
* manage the Student’s assimilation status.

# DATA RELATED TO THE STUDENT’S EDUCATIONAL AND ACADEMIC RECORD

* + 1. **Data related to the student’s educational and academic record outside of the University**

The following personal data related to the Student are collected and processed:

1. secondary school diploma or any diploma recognised as equivalent by the Wallonia-Brussels Federation, and secondary school attended;
2. if applicable, academic and non-academic higher education degrees or degrees recognised as equivalent by the Wallonia-Brussels Federation;
3. previous studies in academic and non-academic higher education institutions;
4. disciplinary decisions made by academic and non-academic higher education institutions ordering the Student’s permanent expulsion.

# Data related to the student’s academic record within the University

The following personal data related to the Student are collected and processed:

1. enrolments for each academic year, including programmes attended and transcripts for all courses, as well as any honours granted at the end of each programme;
2. opinions of the exam boards and decisions made by the vice-rector in charge of student affairs regarding re-enrolment applications from students who are no longer eligible for public funding;
3. information about the Student’s special status related to their studies and academic situation (eligibility for public funding, programme adjustments, reduced course load, etc.);
4. decisions made pursuant to the regulation on student discipline;
5. in libraries, descriptive data related to theses and dissertations, and data related to book loans and holds.

## Data referred to in sections 2.3.1 and 2.3.2 – Purpose of processing

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

1. check applicable requirements for admission, enrolment, re-enrolment, and funding;
2. produce official documents related to the Student’s academic record;
3. organise annual teaching curricula and evaluation sessions;
4. manage course material, including running the virtual university;
5. enable the use of existing and new management systems or applications to which the University has subscribed, including for its libraries;
6. fight academic fraud;
7. organise admission exams;
8. provide professional orientation;
9. improve the quality of the University’s teaching, by developing indicators and statistics;
10. produce statistics related to secondary schools that students have attended before enrolling at the University, in accordance with the University’s information policy regarding its educational offering.

Regarding descriptive data related to theses and dissertations, the purpose of the processing is administrative management, institutional archiving, and communication to the public.

Data related to the student’s academic record within the University (2.3.2) may also, if applicable, be shared upon request with other higher education institutions (whether in Belgium or abroad), only for the purpose of processing the Student’s application to these institutions, including as part of student mobility programmes such as Erasmus.

## Data referred to in sections 2.3.1 and 2.3.2 – Length of retention

The data related to the Student’s record referred to in sections 2.3.1 and 2.3.2 are retained for an unlimited duration in order to:

* ensure the proper archiving of diplomas, titles, ranks, certificates, and transcripts delivered by the University, as well as of tests and examinations;
* certify that the Student has studied at the University, in the event that their diplomas or certificates proving their studies are lost or destroyed;
* check that students who wish to re-enrol fulfil the requirements.

# Data related to specific student support programmes

Registration to specific programmes that provide support to students, such as methodology classes, remediation, and guidance sessions.

## Purpose of processing

Manage specific student support programmes within the University, and produce various reports on student support required by the government, as ‘remediation’ programmes are taken into account when calculating funds allocated by the French Community of Belgium.

## Length of data retention

The data are retained as long as the Student is enrolled in the University, in order for admission boards to recognise these activities in accordance with the requirements defined by the academic authorities, in the context of an admission, reorientation, or personal remediation process.

# Data related to the student’s specific needs

Medical, social, or professional data that justify a specific need pursuant to application regulations or internal University rules.

## Purpose of processing

Assess student requests to have their special needs recognised by the relevant authorities, and implement the accommodations required for studies at the University and campus accessibility.

## Length of data retention

The data referred to in section 2.3.4 are retained until the end of the academic year(s) for which the student’s status is recognised.

# DATA RELATED TO THE PAYMENT OF TUITION FEES

Payment status for tuition fees, regulatory categories related to tuition (reductions, scholarships); decisions to divide and structure payments; if applicable, bank account number and tax assessment notice.

## Purpose of processing

Determine the amount of the tuition owed by the Student, follow up on their payment status, and confirm or cancel their enrolment depending on the fulfilment of their financial obligations and the payment of their debts.

## Length of data retention

The data related to the payment of tuition fees are retained for 10 years, i.e. the limitation period of any debt.

# MEDICAL DATA

Results of the medical examination, any additional information collected by medical services during occasional procedures.

## Purpose of processing

Create a medical record for the Student, either for examinations required by law or regulations or for medical consultations requested by the Student.

The data are collected and processed by their recipients in accordance with specific legal and ethical requirements related to the management of medical data.

## Length of data retention

Medical data are retained in accordance with specific legal requirements related to medical data.

# SOCIAL DATA

Data related to the Student’s social circumstances, collected by the Student Welfare Office in order to process applications for social aid: any information about the Student’s family, social, and financial status: tax assessment notice, household composition, parents’ occupations, and any other financial or social document.

## Purpose of processing

The data are collected and processed for the purpose of processing applications for social aid submitted by the Student to the University, including in order to:

* objectively assess the Student’s status and decide whether to grant or deny their request, as appropriate;
* implement the decision made and, if applicable, make any necessary payments.

The data are processed exclusively by the Student Welfare Office in accordance with ethical requirements that apply to social workers in charge of student files, including pseudonymisation. The data may also be sent to other members of the University’s staff, who will also be bound by professional secrecy, and only when this is necessary for the Student to receive their entitlement.

## Length of data retention

Social data are retained for 10 years after the Student is no longer enrolled in the University, in case of an inspection from the Wallonia-Brussels Federation or in order to retroactively investigate fraud cases.

# DATA RELATED TO THE STUDENT’S HOUSING IN A UNIVERSITY HALL OF RESIDENCE

Student housing contracts and their essential information (duration, rent, etc.) are retained, along with any correspondence related to the rental agreement, such as debt notices for rent or utility bills and incident reports.

## Purpose of processing

Ensure the proper management of the halls of residence, including payment of rent and utility bills, rental agreement renewals, compliance with rental agreement provisions, and rental agreement terminations, as well as collections and conflict resolution.

## Length of data retention

The data related to the Student’s housing in the University’s halls of residence are retained as long as the Student is enrolled in the University.

# FURTHER PURPOSES

The data collected by the University and referred to above may be processed for other purposes that must be compatible with those that initially justified collecting the data, such as to enable the relevant bodies to deliver documents required for the exercise of regulated occupations by University graduates, or to use the Student’s general identification data (surname, given name, address, personal and ULB e-mail address, faculty, year of studies) in order to send them useful information regarding:

* + academic, scientific, cultural, and social activities and events hosted or supported by the University;
	+ the University’s internal offering of services.

In addition, the University may share certain data about the Student with its researchers or academic research units, as a response to legitimate requests made in the context of scientific or statistical surveys, provided that the data be first anonymised or pseudonymised. If the data are pseudonymised, this must be done by a different entity than that in charge of processing the data. This entity may however be part of the University.

# SHARING DATA WITH THIRD PARTIES

As part of the University’s legal obligations, it may share the Student’s personal data with Belgian public authorities.

The University shares identification data related to student members of its plenary assembly with the Belgian Official Journal for publication.

The University shares identification data and academic records with FRS-FNRS Graduate Schools in which the Student is enrolled.

The University shares identification data and academic records with organisations and institutions in which the Student is completing an internship contract.

The University shares identification data with insurance companies when the Student’s particular situation requires specific coverage.

The Student shares identification data (surname, given name, student number) with the Presses Universitaires de Bruxelles in order to provide the Student with free course materials, if the Student qualifies for this aid.

The University also shares data with its subcontractors, strictly to the extent required for the running of management systems or applications to which the University has subscribed, whether new or existing. The list of third-party companies with which data are 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 the appropriate measures described in the GDPR are taken.

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

# STAFF AUTHORISED TO ACCESS AND PROCESS DATA

The data referred to above are accessible only to University services and their staff members, 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 subcontracting agreements as mentioned in section 4 above.

All staff members are bound by confidentiality rules regarding all personal data processed by ULB.

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

#  CONSENT FOR OTHER PURPOSES

Upon enrolling in the University, the Student is asked whether they consent to:

1. the use of their personal identification information and academic record (surname, given name, private address, private and ULB e-mail addresses, faculty, year of studies) to inform them of job offers or commercial offers related to their studies;
2. the sharing of their personal identification information (surname, given name, private address, private and ULB e-mail addresses, faculty, year of studies) with student clubs or ULB alumni associations;
3. the sharing with researchers or third-party academic research departments, for the purposes of scientific or statistical studies of substantial value, of:
	* their personal identification information (surname, given name, private address, private or ULB e-mail address);
	* data related to their academic record (faculty, year of studies, degrees earned, honours), provided this information is anonymised or pseudonymised.
4. the sharing of personal data related to their academic record in the University with the secondary schools they have attended and that wish to know about the academic careers of their former pupils.

The Student is free to withdraw their consent using the online portal at any time.

#  RIGHTS OF THE STUDENT AND RELEVANT CONTACT PERSON

The Student is entitled, provided they show proof of their identity, to:

* 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/](https://www.autoriteprotectiondonnees.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 the 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 data controller 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 their 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.