Privacy & Data Security Policy VSA Nijmegen

How we respect your privacy

This privacy policy applies to information we (Vegan Student Association Nijmegen) collect about individuals who interact with our organization. It explains what personal information we collect and how we use it.

If you have any comments or questions about this policy, feel free to contact us at info@vsa-nijmegen.nl.

0. Definitions

For the rest of this document, we will abbreviate ‘Board and Board Support Committee’ as ‘board’. Both the Board and the Support Committee need to be voted in at the General Assembly to gain access to the specified personal data.

1. Personal data that we process

VSA Nijmegen collects, stores, and uses personal data for a variety of purposes. In the table in section 10, you can see the types of data we collect, store, and use, for what purpose, and the legal basis for why we are allowed to do so.
The following table explains the types of data we collect, store, and use and the legal basis, under current data protection legislation within the General Data Protection Regulation 2018 (GDPR) on which this data is processed.

In general, VSA Nijmegen aims to collect and process as little personal data as possible. Whenever feasible, we will collect data in an anonymised or pseudonymised form. However, you should be aware that it may still be possible (for people who know you) to figure out who you are from anonymised or pseudonymised data. This is especially relevant for #9 in the table in section 10: the member survey.

2. How we use your data

When you supply personal information to us, we are legally obliged by the GDPR to ensure that the information you have provided is only used for the purpose for which it was intended and to ensure that the data is stored securely. We will only use your data for the purpose it was collected for, as described in the table in section 10. To store your data securely, we use Google Drive.

3. Who can see your data

Unless otherwise specified in the table in section 10, your data can only be seen by the current board of VSA Nijmegen. In some instances, we share data with third parties. Those are not included in the table but are instead described in section 4.

4. When we share your data

We do not share your personal data with third parties without your explicit consent unless it is necessary for us to do so. Usually, when we want to share your data with third parties, we already ask for consent to share your data when we gather the data. This may be done in the following situations:

- We share your data with the platforms where we store data. For example, event registration forms are stored by Google.
- We use SNS Bank for our finances. They can see your name, bank account number, when you paid your membership fee, and when we pay you back for expenses made on behalf of the VSA.
- We may share pictures in which you are recognizable on our social media, like Instagram, on our website, or in our newsletter. Everyone can see pictures on our social media and on our website, and members and Friends can see the pictures in our newsletter. When we organize events in collaboration with other organizations, these pictures may also be posted on their social media accounts. One of these organizations is VSA Netherlands, which may also use our photos for promotional purposes.
- While this isn't a type of data that we process ourselves, when you join a WhatsApp group or we add you to a WhatsApp group, your phone number is implicitly shared with the other members of that specific group. For this reason, joining VSA Nijmegen WhatsApp groups is completely voluntary and optional. Note that WhatsApp (the company) can also see which groups you are a member of. Depending on your settings, WhatsApp may share this information with their parent company Meta. In VSA WhatsApp groups, the advanced privacy setting is turned on, so that @Meta AI cannot be mentioned and the content of messages cannot be shared with the Meta Artificial Intelligence.
- The RU and HAN may ask for our list of members (including our student-benefactors and honorary members) to determine whether we meet the requirements to stay recognized as a student organization. They may also ask for this list to determine how much financial compensation the board receives, which is partially based on the size of the organization. We are obliged to comply.

The table in section 10 explains when we asked for your consent for the purposes specified above.

In case it is necessary for us to share your data for a reason not listed above, we will inform you immediately. If we would like to share your data, but it is not strictly necessary, we will ask for your explicit consent before sharing the data.

5. How long we keep your data

We take the principle of data minimization seriously. We will keep your data only as long as is necessary, and delete your data afterward.

A detailed overview of when we delete your data can be found in the table in section 10. Note that, as described in section 6, if the table in section 10 says that the processing of your data is based on consent, you can revoke your consent at any time. When you do so, we will delete your data as soon as possible.

6. Rights you have over your data

The GDPR specifies a range of rights you have over your data. If you want to invoke these rights, you can send an email to info@vsa-nijmegen.nl or contact one of our board members. These rights include, but are not limited to:

- When data processing is based on consent, you may revoke this consent at any time. You can use the link at the bottom of our emails to revoke consent regarding our newsletter. If you want to revoke consent regarding other matters, please contact us as specified above. Note that you can revoke your consent about specific data and specific purposes for which we use that data. For example, you can tell us you do not want your pictures to be used in future posts on Instagram, but that pictures that are already posted can stay online.
- You have the right to rectification as specified in Article 16 of the GDPR. If you want to correct information we process that is inaccurate, you can notify us and we will change it.
- You have the right to be forgotten as specified in Article 17 of the GDPR. You can ask us to delete the information we process concerning you.
- You have the right to data portability as specified in Article 20 of the GDPR. You can ask us to send you the data we store about you.

7. Modifications

We may update this policy from time to time. You can find the most recent version on our website. If a change we make meaningfully alters what data we store, what we use it for, or the rights we have regarding that data, we will notify the people who are affected.

8. Data handling

VSA Nijmegen has implemented access controls to ensure that only authorized individuals have access to specific data. With Google Workspace, data is encrypted using Secure Sockets Layer (SSL) or Transport Layer Security (TLS) protocols. Other methods for other services include strong passwords and two-factor authentication. When handling data, VSA Nijmegen avoids using unsecured Wi-Fi networks for transmitting sensitive information. Whenever our organization uses third-party vendors for any services, we ensure they also comply with data protection regulations.

9. Incident response

Whenever an incident occurs, VSA Nijmegen will notify the relevant authorities and affected individuals within as short a timeframe as possible.

10. Detailed information

How to read this table

Purpose: This describes what we use your data for. We will only use your data for the purpose that is specified here. If we want to use your data for any other purpose, that purpose will be included separately in this table. In case the legal basis for the new purposes is consent, we will have to ask for your consent again for this new purpose.
Data: This describes what data we store and process for the specified purpose.
Legal basis - Explanation: This is why we are legally allowed to process the specified data. Article 6(1) of the GDPR describes 6 situations in which the processing of personal data is legal.
Who can see this besides the board: This describes who can see this data, in addition to the board of VSA Nijmegen. When the table contains an "-", it means only the board can see this data. Note that this table does not include the third parties (like Google, SNS Bank or VSA Netherlands) that we share data with, as mentioned in section 4.
When we delete it: This describes when we delete your data at the latest. If the legal basis is consent, you can also ask us to delete it sooner, as specified in section 6.
Data classification: This section elaborates on the classification of the data. There are three different types: public, internal, and confidential. Public data is information that is intended for public consumption and does not contain sensitive details. It can be shared openly and doesn't require special handling. Internal data is information that is meant for internal use within the VSA, but may not be confidential. It is limited to organization members and should not be shared externally without proper authorization.
Confidential data is sensitive information that requires special protection, such as personal details, financial information, or other private data. We will prioritize the security of confidential data and make sure it is only accessible on a need-to-know basis.

#	Purpose	Data	Legal Basis	Who can see this besides the board	When we delete it	Data classification
1	Membership administration (mandatory)	Name, email address, membership type, payment information, student status, start of membership date, end of membership date	Legitimate interest - We need this data to register you as a member or student-benefactor	The audit committee examines the payment information when auditing the financials; the RU and HAN see your name and student status when re-evaluating our accreditation and board months.	2 months after the end of your membership period	Internal & Confidential
2	Membership administration (optional)	Phone number, accessibility needs	Consent - We ask for consent in our membership registration form	If you choose to join the WhatsApp Community, everyone else in the Community can see your phone number; accessibility needs may be shared with committees to help them accommodate you.	2 months after the end of your membership period	Confidential
3	Member registration and selling tickets for events	Payment information	Legal obligation - We are legally required to store financial transactions for tax purposes	The audit committee examines the payment information when	We are legally required to store this information for at least 7 years. It will be	Confidential

				auditing the financials	deleted within 10 years.	
4	Sending you our newsletter	Email address	Consent - You gave us consent in the registration form	-	Within 2 weeks after the end of your (Advisory Council) membership or Friend period.	Internal
5	Sharing photos and videos on social media, in our newsletter, or on our website	Photos and videos in which you are recognizable	Consent - We asked for consent at the event where the picture was taken	Members of our committees can see all the photos taken at events. Photos that we share can be seen by users of the platform we shared it on.	We will make a selection of the best photos and videos, which we store indefinitely and use for promotional purposes (later). The rest will be deleted within 1 year after the event was held.	Public
6	Organizing events that you attend (Mandatory)	Various, depending on questions asked in the event registration form	Legitimate interest - We need this data to be able to organize the event	Members of the committee organizing the event	1 month after the event was held	Internal
7	Organizing events that you attend (Optional)	Various, depending on questions asked in the event registration form	Consent - We asked for consent in the event registration form	Members of the committee organizing the event	1 month after the event was held	Internal
8	Committee administration and making sure our committees run smoothly	Name, email address, phone number	Consent - We asked for consent when you signed up to join the committee	-	3 months after you stop being a committee member	Confidential

9	Improving the way we operate. This is done with a member survey, in which we ask about all aspects of our association	Various, depending on questions asked in the member survey	Consent - We asked for consent when you gave us this data	-	Immediately after we do a statistical analysis on the aggregate data	Confidential
10	Administration regarding honorary members, (previous) board members, members of the advisory council and confidential contact persons	Name, email address, phone number (optional), photo, reasoning why you deserve to be an honorary member (if applicable)	Consent - You gave us consent when you agreed to accept the applicable role(s)	Your name, photo, and a small description are visible to everyone who visits our website; if advisory council members choose to join the WhatsApp Community, everyone else in the Community can see that phone number.	For transparency and to have an accurate archive, we do not plan to delete this data	Public
11	Alumni administration and organizing alumni events	Name, email address, phone number (optional), student type, start of membership date, end of membership date	Consent - You gave us consent when we asked you if you wanted to be on the alumni list	-	Never, unless you ask us to delete this data	Internal
12	Administration of general assemblies, board meetings, committee meetings and other meetings	Names of participants in meetings, other information depending on what is discussed	Legitimate interest - We need this data to run our association in a smooth manner	Minutes of committee meetings can be seen by members of the committee; minutes of board meetings can be	Within 10 years after the meeting	Internal

				seen by members of the Advisory Council; minutes of general assemblies can be seen by members and student-benefactors who were enrolled at the time the minutes were shared by email.		