

Privacy policy for employees

Your privacy as an employee of Zuyd is important. We are therefore very careful when treating your personal data that we collect in relation to our employment contract. This privacy policy sets out how we collect and deal with your personal data.

We process and secure your personal data as carefully as possible, in accordance with the General Data Protection Regulation (GDPR) and other applicable laws and regulations.

Who is responsible for processing your personal data?

Zuyd University of Applied Sciences Foundation (Stichting Zuyd Hogeschool)
Postbus 550
6400 AN Heerlen
Commercial Register No. 14 06 09 95

Zuyd University of Applied Sciences has a Data Protection Officer. If you have a question concerning privacy legislation or exercising your rights, please contact this officer at the above address or by e-mail functionarisgegevensbescherming@zuyd.nl.

For which purposes do we process your personal data?

We collect and process personal data of employees with an employment contract at Stichting Zuyd Hogeschool for different purposes:

HR and finance

- Compiling a staff file in accordance with the statutory requirements;
- Pursuing an adequate (HR) policy and implement collective labour agreement (CLA) and/or university regulations and the job content in accordance with the employment contract;
- The payroll processing and payment of incidental and other expenses relating to the employment contracts;
- The legal obligation to notify external institutions, including the Tax and Customs Administration, pension provider APG and the Employee Insurance Agency (UWV) of income from employment at Zuyd;
- The implementation of the absence policy and absence supervision and prevention, partly in relation to the *Arbowet* (Working Conditions Act) and the *Wet verbetering poortwachter* (Eligibility for Permanent Incapacity Benefit [Restrictions] Act);
- Supervision in relation to careers, performance, deployability, and vitality;
- The regulation of benefit claims in relation to the termination of the employment contract;
- Processing employee data in the Management Information System (MIS) for generating management information and conducting (policy) research, processing data at an aggregate level and where possible anonymized into reports on education, personnel and finance, which are used for quality improvement, planning, steering, business operations and meeting legal obligations;

- Subsidy applications and compliance with subsidy conditions;
- Handling any complaints or reports to officials including the Confidential advisor the Ombudsman, or the Data Protection Officer;
- Handling disputes (e.g. objections and appeals);
- Providing for the conduct of an audit by an external auditor or a competent government agency;

ICT and communications

- The provision of ICT facilities, including an e-mail or other account, digital storage space, employee card, workplace, equipment and access to MijnZuyd and the accompanying user preferences and settings;
- Access to ICT systems such as Moodle and Osiris for performing education-related work;
- Notification of information on the organization (including via MijnZuyd);
- For the purpose of business communications within and outside Zuyd;
- The monitoring and security of communications with computer and network systems.

Facilities

- The security of access to buildings and sites and security of goods located in buildings or on sites;
- Implementing the parking policy.

Others

- Organizing elections in relation to worker participation;
- Following accreditation and certification processes;
- The implementation or application of a law.

If we use your personal data for purposes other than those stated in this privacy policy, or in the specific information accompanying a procedure or form, we will inform you in advance and, if applicable, request your consent. And if there are changes to the use of your personal data, we will inform you about this. There is no automated decision-making concerning your personal data.

Which personal data do we gather?

- Name and address details: surname, first names, initials, titles, gender, street name and number, postal code, town/city, marital status;
- Age data: age and date of birth;
- Contact details: telephone number(s) and e-mail address(es) (business and private);
- Nationality data;
- Data on education and experience: CV, references, diplomas, study programmes followed and to be followed, training placements, etc.;

- Data on performance: job(s), hours worked, nature, content and termination of the employment contract, performance and assessment, careers guidance;
- Data on attendance/absences: attendance or absence records in relation to leave, reduction of working hours, pregnancy or illness, working conditions;
- Data necessary in relation to an agreed working condition, including data concerning family members and former family members;
- Identification data: citizen service number, identity document and number of identity document, passport photograph and/or other image material, any work and residence permits;
- Financial data: bank account number, income data, data of importance for payment of salaries, social insurance contributions, insurance premiums and other expenses;
- Account data: personnel number, e-mail address, Zuyd user name and password, electronic signature;
- User data/location data: log-in details, IP address(es), device ID and control systems of mobile device(s), building access data, use of employee card;
- Other data which must be processed for the application of a law.

On the basis of which grounds do we gather personal data?

We may only process your personal data if we have grounds for this.

For employees, the grounds for the above purposes often lies in the **employment contract** that we have concluded with you. After all, we need to process personal data in order to be able to execute the employment contract. We are also sometimes **required by law** to process certain personal data and even to provide it to external parties such as the Dutch Tax and Customs Administration, the company doctor, or the UWV (Employee Insurance Agency).

We also sometimes process your personal data for the **legitimate interests** of the university of applied sciences. In these situations, it is necessary to process your personal data for our business processes. Finally, we can also request your **consent** for purposes that are not included in the grounds above.

How does Zuyd acquire your personal data?

We receive most of your personal data that we process directly from you. It is also possible that an external party may supply personal data of yours (e.g. payroll organization, company doctor, the Tax and Customs Administration, Employee Insurance Agency, etc.).

Who receives your personal data?

Within Zuyd, your personal data are processed only by employees of Zuyd assigned to implement one or more of the above objectives. In general, these will be your manager and the HR Service. Sometimes, it is necessary to send your personal data to an employee of Zuyd who is/are necessarily involved in one of the above objectives.

For a number of processes, we use third party service providers, both within and outside the European Union. For this purpose, it is sometimes necessary for us to provide your

personal data to these service providers (processors). We only provide personal data that are necessary for that purpose and we reach agreements concerning the security, use and retention of the data. For example, we contract processors agreements with our service providers and ensure that service providers outside the EU guarantee an appropriate level of security through the application of the EU- US Data Privacy Framework (DPF) or through the application of the 'binding business regulations' that are approved by the Dutch Data Protection Authority (DPA).¹

We can also provide your personal data to third parties that have autonomous responsibility, sometimes with and sometimes without your consent. The provision of your personal data to these parties is often a statutory requirement or in a justified interest of Zuyd, such as a payslip sent to the Dutch Tax and Customs Administration, your contact details sent to the company doctor, or your personal data sent to a subsidy organization such as the Netherlands Enterprise Agency (RVO).

We never sell your personal data.

For how long do we retain your data?

We retain your personal data for as long as is necessary for the purpose for which we collected them. The Selectielijst Hogescholen (Selection list for universities of applied sciences) serves as the principle here.

In general, we erase personal data at the latest two years after the employment contract or the work of the person concerned for Zuyd University of Applied Sciences have been terminated and removed from the personnel file.

We must keep data to be provided for payroll taxes (previously 'wage tax returns' [loonbelastingverklaring]) and a copy of the identity document, work and residence permit for up to five years after the termination of the employment contract. A statutory term of seven years after the end of the employment contract applies for keeping payroll data that is of importance for taxes. If you are awarded benefits under the *Regeling werkhervatting gedeeltelijk arbeidsgeschikten* (WGA, Return to Work [Partially Disabled] Regulations) after a long illness, as an organization that has opted out of the state disability benefit scheme, we keep personal data for a term of 10 years following the termination of the employment contract.

Security of your data

We make every effort to protect your personal data as effectively as possible against unauthorized access, loss, or theft. The systems in which your data are stored are all protected by a password or 2-factor authentication. If we have your personal data processed by a party other than Zuyd, we enter into agreements concerning security, use, and storage of those data.

What are your rights?

You have various rights in relation to your personal data, such as the right of access, rectification, objection, and erasure. A full list of your rights is available on the website of the Dutch DPA at www.autoriteitpersoonsgegevens.nl/en. If you wish to exercise one of

¹ The EU-US Data Privacy Framework (DPF) can be viewed via <http://www.privacyshield.gov/welcome>.

your rights, please contact us at privacy@zuyd.nl. You are also entitled to file a complaint with the Dutch DPA. If you have a complaint, please report it first to your manager or via privacy@zuyd.nl.

Questions

Further information is available on MijnZuyd. If you have any questions concerning privacy legislation or exercising your rights, you can also contact the Data Protection Officer at the above address or by e-mail at functionarisgegevensbescherming@zuyd.nl.

Changes

We may amend this privacy policy at any time, such as if there are changes to legislation. We therefore advise you to consult this policy regularly.