

Sub-Privacy statement Wageningen in'to Languages

SCOPE OF APPLICATION

This Sub-Privacy Statement applies to the processing of personal data by Wageningen in'to Languages. Wageningen in'to Languages is part of Wageningen University & Research. This sub-privacy statement should be read in conjunction with [the privacy policy and privacy statement](#) of Wageningen University & Research. Wageningen in'to Languages respects your privacy and ensures that your personal data are processed in accordance with the applicable laws and regulations. In this statement, we inform you about the way in which Wageningen in'to Languages handles your personal data, for what purposes and on what principles this occurs, how your personal data are processed, what rights you have if your personal data are processed and where you can contact us with questions or requests about your privacy.

What is personal data?

Personal data is data that can be used to identify a natural person.

Processing of personal data by Wageningen in'to Languages

Wageningen in'to Languages processes the following personal data about you:

- a. Name;
- b. Address;
- c. Postal code and city;
- d. Gender;
- e. Phone number;
- f. Date of birth;
- g. Country of birth;
- h. Username (wur-code/login name, Pview key);
- i. E-mail address;
- j. Voice key sound recordings;
- k. Results of tests and exams.

We process the following data in the case of our translation, interpretation or editing service clients:

- a. Name;
- b. Position and departmental name;
- c. Address;
- d. Postal code and place of residence;
- e. Telephone number;
- f. Email address;
- g. Source files, such as texts;
- h. Texts that have been delivered (translated texts, subtitles and edited texts).

Processing purposes

Wageningen in'to Languages processes your personal data for the following reasons:

- a. To be able to confirm your registration and to correspond about registration, course dates, times and testing;
- b. To be able to collect course fees;
- c. To be able to inform you about test results and certification.

Note: Wageningen in'to Languages does not process more personal data than necessary.

Wageningen in'to Languages may use your data for marketing purposes and send you information about our offer, but only if you have given explicit permission. If you wish to revoke your previously given consent, you can do so at any time via our Service Centre: into@wur.nl

Processing principles

Wageningen in'to Languages processes your personal data on the basis of one of the following principles:

- a. You have given permission for this processing of your personal data;
- b. The processing is necessary for the performance of a contract to which you are a party, or to take measures at your request prior to the conclusion of a contract;
- c. The processing is necessary to comply with a statutory obligations incumbent upon us;
- d. To be able to provide translation, interpretation or editing services in the case of our translation, interpretation or editing service clients;
- e. To develop translation memories to boost the efficacy with which we execute contracts in the case of our translation services (this refers to texts and jargon specific to our clients).

Processing special categories of personal data only takes place when this meets the specific criteria set out in the act, or in the case of grounds of exemption as set out in the current legislation and regulations.

Mandatory or voluntary provision

If we ask for your personal data, we will make clear if the provision of the data requested is necessary or mandatory and what the (possible) consequences are if the data are not provided. Our starting point is that we do not process more personal data than necessary for the purposes described.

Sharing with third parties

It is possible that Wageningen in'to Languages may share your data with third parties outside of WUR in the context of the execution of its tasks, but only in the context of the execution of the agreement concluded with you when you register with Wageningen in'to Languages for a training course or exam. Wageningen in'to Languages will provide your data to the following third parties in the context of the performance of its tasks:

- Radboud in'to Languages, Radboud University
Within the consortium agreement between Wageningen in'to Languages and Radboud in'to Languages, correctors from Radboud in'to Languages are used for the correction of RATER examinations.
- Accounts receivable department of Radboud University:
Within the consortium agreement between Wageningen in'to Languages and Radboud in'to Languages, payment and address details of students are passed on to Radboud University's accounts receivable department for payment processing.

If Wageningen in'to Languages shares your data with a third party that processes the data on behalf of Wageningen in'to Languages, we will make arrangements with the third party that meet the requirements of the applicable privacy laws and regulations.

Wageningen in'to Languages does not provide personal data to third parties who will use these data for their own purposes unless this should be required to fulfil statutory obligations or you have consented to this use.

If a third party outside the European Economic Area should process any personal data, measures will be taken to ensure an appropriate security level.

Internal sharing within WUR

Wageningen in'to Languages may also share your (placement) test results with your manager within WUR or with the Student Service Centre of WUR.

Automated decision-making and profiling

Wageningen in'to Languages does not use profiling in combination with automated decision-making.

Retention period

Your personal data will not be kept longer than is absolutely necessary. However, please keep in mind that we are obliged to keep exam data for at least 5 years and financial data for at least 7 years.

If statutory retention periods apply for the relevant personal data, we will observe those periods. In the event statutory and agreed upon retention periods should differ, the longer period will be applicable. Should you want to have your personal data erased at an earlier stage, this could be done in certain circumstances. Please refer to the heading 'Right to rectification and erasure'.

Security of personal data

Wageningen in'to Languages will undertake all appropriate technical and organisational measures to protect your personal data against loss or any form of unlawful processing. Measures that are applied as much as possible in this context include encryption and pseudonymisation of personal data, encryption of communication and treating personal data as confidential.

In accordance with Article 25 of the GDPR (privacy by design en privacy by default), we normally conduct a preliminary DPIA (data protection impact assessment) when procuring a new application and may conduct another one if necessary (Article 35 of the GDPR).

YOUR RIGHTS

Wageningen in'to Languages respects the rights you have pursuant to current data protection laws and regulations.

Below we give you some more information about these rights and how you can invoke them. For more information about your rights, please refer to the WUR [privacy statement](#).

Right of access;

You have the right to see which personal data Wageningen in'to Languages processes about you.

Right to rectification and erasure;

In specific circumstances, you are entitled to have your personal data rectified or erased if the data are not – or are no longer – correct or if the processing is – or is no longer – legitimate.

Right to object;

When we process your personal data by reason of a legitimate interest or a task carried out in the public interest, you have the right to object to that processing.

If you object to the use of your personal data to inform you about activities of Wageningen in'to Languages and similar ('direct marketing') processing, we will always honour this objection. Your data will no longer be used for this purpose.

If you object to other forms of processing of your personal data, we will examine whether we can accommodate your objection. If your objection carries more weight than the interest we have in processing your personal data – and in continuing to do so, we will stop processing these data. If we are of the opinion that our legitimate interest to continue processing your personal data outweighs yours, we will explain our position.

Right to restriction;

In specific circumstances, you also have the right to restrict the processing of your personal data. This means that Wageningen in'to Languages temporarily 'freezes' the processing of your data. You can invoke this right while waiting for the assessment of a request for rectification, if the data should have to be erased because the processing is unlawful but you should request restriction of processing instead of erasure, if Wageningen in'to Languages no longer requires the data whereas you still need these data for legal proceedings – or the preparation of legal proceedings – or pending the assessment of an objection.

Right to data portability;

If we process your personal data on the basis of your consent or an agreement entered into, you have the right, with respect to these data, to receive (in return) the data you provided us with digitally, in a commonly used format. You are then free to transmit these data to any other party.

Withdrawal of consent;

If we process your personal data on the basis of your consent, you usually have the right to withdraw your consent. We will immediately stop the

processing. Withdrawal of consent has no retro-active effect. Any processing that has taken place up to that moment will, therefore, remain lawful.

Exercising the aforementioned rights

To the extent that you wish to exercise your rights, a number of forms are available via the WUR website, on the basis of which you, as a WUR data subject, can submit your request with regard to your own personal data:

<https://www.wur.nl/nl/Over-Wageningen/Integriteit-en-privacy.htm>.

Wageningen University & Research will not charge you any costs for the exercise of your aforementioned rights, except in the case of misuse.

Time limits

In principle, we will respond to your request within a month. If answering your question should take more time, which we hope will not be the case, we will inform you about this within a month. The complexity of the requests and/or the number of requests could lead to the response time being delayed by a maximum of three months.

Identification

We will ask for further proof of your identity in all requests. We apply this rule to prevent personal data being provided to the wrong person or being changed incorrectly and to prevent any changes in the way in which those personal data are processed by us.

Balancing individual interests involved in a request

We would like to point out that the rights described above do not constitute absolute rights. Specific circumstances may lead to a specific request not being honoured. We will assess each request on an individual basis. In the event we cannot honour a specific request, we will explain why not, stating reasons. The right to object to the use of data for direct marketing purposes is absolute. Cancellations for any commercial expressions will therefore be honoured in any case.

MONITORING

Data protection officer

Wageningen University & Research has a Data Protection Officer (DPO).

The DPO supervises compliance with privacy legislation within (parts of) WUR and advises on data protection laws and regulations. The DPO is independent. The DPO reports directly to the Executive Board and the Supervisory Board. The corporate privacy officer is the contact person for questions relating to data protection and can be contacted via privacy@wur.nl.

National supervisor

Under the data protection laws and regulations you can also file complaints with the national supervisor, the Dutch Data Protection Authority. You will find further details on the website of the Data Protection Authority:

(<https://www.autoriteitpersoonsgegevens.nl/en>).