

# Privacy Policy for Flyt

Last changed: 11.03.2019

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## 1) Brief presentation of Flyt

Flyt is a web application that allows administrative and academic staff to process applications and complaints from students. Flyt gathers larger parts of the case processing in one system, transfers information regarding the case back to Felles Studentsystem (FS,) and ensures that the documents in the case are archived.

## 2) About this privacy policy

This privacy policy describes how Norwegian School of Economics manages your personal data in Flyt. The purpose of this privacy policy is to inform you of the types of personal data that is processed, how it is processed, who is responsible for the processing, your rights and your point of contact.

## 3) What is considered personal data?

The term personal data includes any data, information and assessment that can be linked to you as an individual, cf. **GDPR Article 4 no. 1**. Personal information is defined as information that may be used to identify a specific person. This may be only one type of information, such as a unique ID, or a combination of information such as name and address.

## 4) The purpose of and legal basis for the processing of personal data in Flyt

### Purpose

Flyt needs to process some of your personal data to enable you to perform various tasks. We need data about you in order to:

- Give you access to cases that you want to distribute to an administrative officer.
- Give you access to cases and subtasks you want to process yourself.
- Ensure that Flyt is working properly and to be able to correct any errors that should occur during the case processing.

### Legal basis

Flyt is subject to the provisions of the Personal Data Act and Personal Data Regulations.

The legal basis for processing personal data in Flyt is regulated in the contract between you, as an employee, and your employer, cf. GDPR Article 6 no. 1 litra b.

## **5) Which kinds of personal data are processed by Flyt, and how long to we store your personal data?**

No sensitive personal data is stored in Flyt.

In Flyt, we store your name, national identity number (11 digits), email address and information about where you work (faculty or department).

The personal data presented in Flyt is retrieved directly from the FS-databases of the university/university college where you work.

We also store information about your actions in Flyt. Some of this data is erased three months after a case has been closed. Data about who processed a case, how long the case processing took and if the case was reassigned to a different administrative officer is stored indefinitely, for statistical purposes.

The personal data of students that you register in Flyt is sent to Felles studentsystem (FS) and to the archive system Public 360.

## **6) Automatic processing**

Your personal data will not be used in automated processing or profiling.

## **7) Disclosure of your personal data to third parties**

Disclosure or data export is defined as any data transfer that is not part of the controller's own systems or data processing, or transferred to the person himself or herself, or to any other party that is receiving the data on the person's behalf.

Norwegian School of Economics may disclose or export data, including personal data, to other systems, i.e. external data processors, whenever it is deemed necessary in the pursuit of Flyt's objectives.

Your personal data will not be disclosed to countries outside of the EU/EEA, or to any international organizations.

Your personal data may be disclosed to the following parties/agencies:

1. Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research.

Flyt is developed by Unit. Unit staff who need to access your personal data as part of their job will be granted such access. This access is needed to provide user support and, if relevant, to correct errors.

2. University Center for Information Technology (USIT) at the University of Oslo (UiO)

Flyt is operated by USIT at UiO. USIT staff who need to access your personal data as part of their job will be granted such access. This access is needed to provide user support and, if relevant, correct errors.

3. UNINETT AS

When you log on to Flyt, you use the log-in service FEIDE. FEIDE is developed and provided by UNINETT AS. UNINETT AS staff may access your FEIDE user name and IP address, provided they need such access to perform their duties. This access is needed to provide user support and, if relevant, correct errors. Your personal data will be erased from FEIDE after six months.

#### 4. Other employees at your institution

Other users who are logged in to Flyt can see your name and organisational unit. This allows distribution of cases and other sub-tasks, and to allow staff involved in the processing of a case to communicate with each other during the proceedings.

### **8) Personal data safety**

Norwegian School of Economics regularly perform risk and vulnerability analyses to protect your personal data in Flyt. In addition, various security measures have been implemented, such as access control, to keep the number of people who have access to your personal data as low as possible.

### **9) Your rights**

#### Right to information and access

You have the right to information about how Norwegian School of Economics process your personal data. The purpose of this privacy policy is meant to provide you with all information you have the right to get.

You also have the right to view/access any and all personal data registered about you at Norwegian School of Economics . You also have the right to request a copy of the personal data registered about you.

#### **Right to correction**

You have the right to have incorrect personal data about you corrected. You also have the right to supplement any and all incomplete data registered about you. Please contact us if you believe we have registered incorrect or incomplete personal data about you. It is important that you justify and, if relevant, document why you believe the personal data registered is incorrect or incomplete.

#### **Right to limit processing**

In certain circumstances, you have the right to demand limited processing of your personal data. Limiting the processing of personal data means that your personal data will still be registered, but the opportunities for further processing are limited.

If you believe that personal data about you is incorrect or incomplete, or you have filed a complaint against the processing of your data (read more about this below), you have the right to demand that the processing of your personal data is temporarily limited. This means that processing will be limited until, we have either corrected your personal data or until we have been able to assess whether your complaint is justified.

In other circumstances you may also demand a more permanent limitation on the processing of your personal data. In order to qualify for the right to limit processing of your personal data, the conditions established by the Personal Data Act and Article 18 of the GDPR must be met. If we receive a request from you to limit processing of your personal data, we will assess whether the statutory conditions have been met.

#### **Right to erasure**

In certain circumstances you have the right to demand that we erase your personal data. The right to erasure is not unconditional. Whether this applies to your situation, must be assessed in light of relevant privacy legislation, i.e. the Personal Data Act and GDPR. Please contact us if you want to have your personal data erased. It is important that you justify why you want the personal data erased, and, if possible, that you also specify which personal data you want erased. We will consider whether the conditions for erasure, as established by law, have been met. Please be advised that the law allows us to make exceptions to your right to erasure. For example, we may need to store

personal data for the purpose of performing a task in compliance of the Act Relating to Universities and University Colleges, or for reasons of public interest, such as archiving, research and statistics.

### **Right to object**

You may have the right to file an objection against the processing, i.e. object to the processing, on grounds that you have a specific need to stop the processing, e.g. if you have a need for protection, have a secret address, etc. The right to object is not unconditional, and it is contingent upon the legal basis for the processing, and on your particular circumstances. The conditions are established by Article 21 of the GDPR. If you object to processing of your personal data, we will consider whether the conditions for filing an objection have been met. If we find that you have the right to object to the processing and that your objection is justified, we will discontinue processing, and you will have the right to demand erasure of the data. Please be advised that we under certain circumstances may make exceptions from erasure, e.g. if we have to store your personal data for the purpose of performing a task in compliance with the Act Relating to Universities and University Colleges, or for reasons of public interest.

### **Right to file complaint against processing**

If you believe we processed your personal data incorrectly or unlawfully, or if you believe we failed to protect your rights, you have the right to file a complaint against processing. Please see item 10 below for how to contact us.

If we dismiss your complaint, you may file your complaint with the Norwegian Data Protection Authority (DPA). The DPA is responsible for making sure Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

## **10) Contact information**

### **Data controller**

Norwegian School of Economics is the data controller of personal data in Flyt, cf. **GDPR Article 4 no. 7**.

If you wish to exercise your rights as established in item 9 above, please contact us at [maj-brit.iden@nhh.no](mailto:maj-brit.iden@nhh.no). We will process your request as soon as possible and within 30 days at the latest.

### **Data protection officer**

Norwegian School of Economics has appointed a data protection officer whose responsibility it is to protect the personal data interests of both students and staff at Norwegian School of Economics. You may contact the data protection officer about the administrative processing of personal data at Norwegian School of Economics via e-mail: [Monica.Oen@nhh.no](mailto:Monica.Oen@nhh.no)

### **Service provider**

Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research is the provider of Flyt. This means that Unit develops and maintains Flyt, and Unit is also responsible for the day-to-day operation of Flyt. As part of this task, a select few of Unit's staff have access to all personal data registered in Flyt.

Contact information for Unit: [fs-sekretariat@fsat.no](mailto:fs-sekretariat@fsat.no)