Privacy statement for the Common Student System (FS)

- for applicants and students

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1) The Common Student System (FS) in brief

The Common Student System (FS) is a student administrative system developed for universities, specialised university colleges and state university colleges. Private university colleges can also use the system. When you apply for admission to and study at the Norwegian School of Economics, your personal data will be registered, processed and stored in FS.

A number of applications are linked to the student administrative system FS. This means that data that are registered in these applications are also stored in FS. Data from FS are reported to a number of parties/enterprises for various purposes.

2) What is a privacy statement?

This privacy statement describes how the Norwegian School of Economics processes your personal data in FS. The purpose of this privacy statement is to inform you about what personal data we process, how they are processed, who is responsible for the processing, what your rights are and who you can contact.

3) What is considered personal data?

Personal data are all forms of data, information and assessments that can be linked to you as a person, cf. the GDPR Article 4 (1). The decisive factor as to whether data constitute personal data is whether they can be linked to an identified or identifiable natural person.

Data that, on its own, cannot be linked to a natural person may, in cases where the data are found together with other data, constitute personal data if they indirectly identify a person.

4) The purpose of and legal basis for the processing of personal data in FS Purpose

The purpose of the processing of personal data in FS is to safeguard your rights as a student, applicant, course participant or PhD candidate and to fulfil the institution's duties and obligations under the Act relating to Universities and University Colleges.

For example, the Norwegian School of Economics needs to process personal data in FS in order to

• process your application for admission to a study programme/exam/course

- carry out the necessary administration relating to your studies and you as a student
- document the results you achieve

Legal basis

The legal basis for the processing is the Act relating to Universities and University Colleges Section 4-15 and the GDPR Article 6 (1) letter (e) and (3) letter (b). The processing is necessary in the exercise of official authority, and in order to fulfil and comply with provisions of the Act relating to Universities and University Colleges. Another reason for the processing is to allow the institution to safeguard your interests as a student in the best possible manner. In some cases, the institution has chosen to supplement the legal basis with declarations of consent for the processing of certain types of data.

5) What personal data are processed in FS?

No sensitive personal data about you are stored or processed in FS at present.

The following personal data may be processed in FS: profile information (such as your name, personal ID number/D number/S number (11 digits), gender, contact information, information about your background, first language, photo), application information, consents you have given, status (such as residence permit and transcript of police record if relevant), semester registration information, invoice information and information about study programmes and courses.

Your personal data can be obtained from:

- 1. You via the Norwegian Universities and Colleges Admission Service's application portal
- 2. You via Søknadsweb
- 3. You via EVUweb
- 4. You via Studentweb
- 5/8 The national certificates of upper secondary education database (NVB)
- 6. Other universities/university colleges
- 7. The Contact and Reservation Register
- 9. Other persons who register you in EVUweb
- 10. Other persons who register you in Nomination
- 11. Case officers at the Norwegian School of Economics
- 12. The central population register (National Registry)
- 13. The Norwegian State Educational Loan Fund (Lånekassen)
- 14. Digital exam systems
- 15. Fagpersonweb
- 16. User administration systems
- 17. The institution's financial management system
- 18. Archive system

Voluntary registration

- 1. You via the Norwegian Universities and Colleges Admission Service's application portal
- 2. You via Søknadsweb
- 3. You via EVUweb
- 4. You via Studentweb

It is voluntary for you to register personal data in the Norwegian Universities and Colleges Admission Service's application portal, Søknadsweb, EVUweb and Studentweb, but we may not be able to process your applications without your personal data. In the Norwegian Universities and Colleges Admission Service's application portal, Søknadsweb and EVUweb, you can register information related to applications and course registration. In Studentweb, you can register information related to admission applications, information about your background, registration for teaching activities and exams, applications, and documents you upload. We may need these data to process your applications and for you to be able to study at the Norwegian School of Economics.

5. The national certificates of upper secondary education database (NVB) If you apply for admission to the Norwegian School of Economics via Søknadsweb, you can consent to allowing us to obtain personal data about you from this national database, which contains most electronic certificates of upper secondary education issued since 2000. If you consent, we will obtain your name, personal ID number (11 digits), the name of the school you went to, and your subjects and grades.

6. Other universities/university colleges

If you apply for admission to the Norwegian School of Economics and have achieved results at another university/university college that also uses FS, you can consent to an exchange of results. If you consent, a case officer can obtain information about all your results from all Norwegian institutions that use FS. This means most universities and university colleges in Norway except BI Norwegian Business School. We refer to the institution's privacy statement for further information about the processing of your personal data.

If you have achieved results at a university/university college outside of Norway that participates in the EMREX network, you can transfer your record to the Norwegian School of Economics yourself via Søknadsweb or Studentweb.

If a Norwegian educational institution has imposed sanction(s) on you that will have a bearing on your applicant/student status with other Norwegian educational institutions as well (pursuant to the Act relating to Universities and University Colleges Sections 3-7(8), 4-8(1) to (3) or 4-10(3)), the Norwegian School of Economics will receive personal data about you via the register of excluded students (RUST). Only a small number of selected personnel at the Norwegian School of Economics will have access to the personal data in question. See the privacy statement for RUST.

7. The Contact and Reservation Register (KORR)

FS can retrieve your email address and mobile phone number from the Contact and Reservation Register (KORR). If you do not want anybody to be able to retrieve your contact information from KORR, you can opt out. For more information, see <u>https://www.difi.no/fagomrader-og-</u> tjenester/digitale-felleslosninger/kontakt-og-reservasjonsregisteret

Registration without your express consent

8. The national certificates of upper secondary education database (NVB) If you apply for admission to the Norwegian School of Economics via the Norwegian Universities and Colleges Admission Service, we will obtain personal data about you from the national certificates of upper secondary education database, which contains most electronic certificates of upper secondary education issued since 2000. In such cases, we will obtain your name, personal ID number (11 digits), the name of the school you went to, and your subjects and grades.

9. Other persons who register you in EVUweb

In some cases, employers and other parties register information about you in EVUweb. This situation will usually arise if you are to study or take part in continuing or further education at the Norwegian School of Economics under the auspices of your employer. We may need these data to process your application/registration for admission to study programmes/courses.

10. Other persons who register you in Nomination

Nomination is a web application where external institutions can nominate exchange students for Norwegian educational institutions. If you have been nominated in Nomination, you will already have been informed by email. The following personal data are entered in Nomination and then transferred to FS: first and last name, gender, email address, date of birth, nationality and what you have been nominated for. The nominator can also upload documents with the nomination. Nominees can see their personal data and any documents in Søknadsweb.

11. Case officers at the Norwegian School of Economics In some cases, it is necessary for case officers at the Norwegian School of Economics to register information about you in connection with your studies, for example assessments relating to applications for admission, grounds for and appeals against grades, and information relating to completion of study programmes.

12. The central population register (National Registry) In order to ensure that your name and address are correctly registered in FS, we retrieve your name and address from the National Registry.

13. The Norwegian State Educational Loan Fund (Lånekassen)

Lånekassen sends a list of all its customers to the Norwegian School of Economics. This is done so that we will know whose personal data to send to Lånekassen in connection with loans. See section 8.6 below for further information.

14. Digital exam systems

More and more exams are taken in digital exam systems. The grades and grounds registered to your name in the exam systems by lecturers and examiners are sent to FS.

15. Fagpersonweb

In the same way as for digital exam systems, grades and grounds can be registered to your name in Fagpersonweb. Fagpersonweb is a web application used by lecturers and examiners. In addition to grades and grounds, attendance can also be registered in Fagpersonweb.

Personal data about you that are registered in Fagpersonweb, are sent to FS.

16. User administration systems

Your personal data are registered in a user administration system called AD in order to create a user account for you at the Norwegian School of Economics that enables you to access our IT services. We register your name and photo, personal ID number (11 digits), student number, PIN code and course registrations.

17. Financial management system

The payment of semester fees, course fees and other student fees are processed in Unit 4 –Business World (Agresso). This entails the following personal data about you being sent from FS to Unit 4 – Business World (Agresso): student number, name, customer group, all phone numbers, all addresses, email addresses, and your URL if one is registered.

18. Archive system

The Norwegian School of Economics uses the archive and case processing system Public 360. This entails the following data about you being shared with Public 360: name, personal ID number, student serial number, semester and home address, and student and private email address.

6) In some cases, we use automated case processing

When you apply for admission to the Norwegian School of Economics, a number of processes involved in the processing of your application will may be partially or fully automated. This will apply in the following cases:

- assessment of whether you are qualified for admission
- calculation of points for admission
- allocation of places on study programmes
- calculation of who is allowed to register for which subjects (via Studentweb)

- registration for teaching activities and exams and allocation of places for teaching activities with limited capacity
- control of individual education plans
- creation of invoices
- when you complete a study programme: calculation of the qualification achieved
- revocation of your right to study if you fail to meet study progress requirements
- calculation of an overall grade for courses where exams consist of several parts

7) How long do we store your personal data?

In principle, all your personal data in the Common Student System (FS) will be stored indefinitely. However, there are some exceptions to this rule:

Documents concerning applicants who apply via the Norwegian Universities and Colleges Admission Service and are not admitted will be erased once the admission process has been completed.

Personal data related to sanctions pursuant to the Act relating to Universities and University Colleges Sections 3-7(8), 4-8(1)–(3) or 4-10(3) will automatically be deleted from FS six months after the sanction period expires.

If the Norwegian School of Economics is informed that you have died, your contact information will be deleted. Any applications for admission, registrations for teaching activities, courses and exams etc. will be withdrawn.

8) We disclose your personal data to third parties

Disclosure or export of data is defined as all disclosure of data aside from to our own system/processing or to the data subjects themselves, or to someone who receives data on their behalf. The Norwegian School of Economics can disclose or export data containing personal data to other systems, i.e. to an external data processor, in cases where it is deemed necessary to do so.

Your personal data will not be disclosed to countries outside the EU/EEA or to international organisations.

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

- Unit the Directorate for ICT and Joint Services in Higher Education and Research (provider of FS)
- 2) The University Center for Information Technology (USIT) at the University of Oslo (UiO)(operates FS)
- 3) The student welfare organisation Sammen
- 4) The central population register (National Registry)
- 5) The Norwegian State Educational Loan Fund (Lånekassen)
- 6) Canvas
- 7) Wiseflow
- 8) P360
- 9) Timeedit
- 10) Kong Arthur
- 11) Unit 4 Business World
- 12) NHHS the student union at NHH
- 13) Other universities and university colleges
- 14) NOKUT the Norwegian Agency for Quality Assurance in Education
- 15) BIBSYS/other library system provider
- 16) Statistics Norway (SSB)
- 17) NSD Norwegian Centre for Research Data and the Database for Higher Education (DBH)
- 18) NIFU Nordic Institute for Studies in Innovation, Research and Education

- 19) The Norwegian Directorate of Health
- 20) Other parties that are entitled to access to your personal data pursuant to the Freedom of Information Act
- 21) The email addresses of active students are disclosed to NHH students that conduct questionnaire surveys as part of the assessment in courses taught at NHH.

1) Unit – the Directorate for ICT and Joint Services in Higher Education and Research FS is developed by Unit. Unit employees who need it to perform their work will be given access to your personal data.

2) The University Center for Information Technology (USIT) at the University of Oslo (UiO) FS is operated by USIT at UiO. USIT employees who need it to perform their work will be given access to your personal data.

3) The student welfare organisation Sammen

If you have paid the semester fee for the current term or have been granted a right to study during the past two months, the student welfare organisations in Norway can retrieve information about you from the Norwegian School of Economics. This is so that they will know that you are a student and are thus entitled to student discounts on their services. The student welfare organisation can retrieve your personal ID number (11 digits), your name, when you last paid a semester fee and your student ID information.

4) The central population register (National Registry) The Norwegian School of Economics sends the following personal data to the National Registry: name, personal ID number (11 digits) and address. We do this <x> times a year to ensure that your personal data are up to date.

5) The Norwegian State Educational Loan Fund (Lånekassen) If you are a customer of Lånekassen, information about you will be sent to Lånekassen as soon as you have been registered as a student. The following personal data are transferred to Lånekassen once a day: personal ID number/D number (11 digits) and which university/university college you have been admitted to.

If you have taken an exam and/or received prior recognition of education taken abroad or a stay abroad, information about you will be sent to Lånekassen. The following personal data are transferred to Lånekassen once a day: personal ID number/D number (11 digits), which university/university college you have taken an exam at, the exam result (pass/fail/not graded, if passed: the grade).

We transfer your personal data to Lånekassen so that you do not have to document your student status and the education you have completed.

6) User administration systems

In order for you to be given an IT account at the Norwegian School of Economics and have access to our IT services, your personal data must be registered in a user administration system called Active Directory (AD). In connection with this, a photo is retrieved and we send personal data such as address information, photo, group affiliations and information about teaching activities and exams you have registered for from FS to AD by email. We retrieve your name, personal ID number, student number, PIN code and course registrations.

7) Canvas

The Norwegian School of Economics uses Canvas for teaching purposes, and sometimes also for exams. This means that Instructure (<u>https://www.instructure.com/</u>), which develops and operates Canvas, will have access to your personal data. In connection with this, your student number, name, student email address and assessment registrations will be retrieved.

8) Wiseflow

The Norwegian School of Economics uses the exam system Wiseflow for many exams. We send personal data about you to Wiseflow in order to make it possible for you to take exams digitally. UNIwise, which develops and operates Wiseflow, will have access to your personal data. In connection with this, your name, personal ID number, student number, email address and course and assessment registrations will be retrieved.

9) Public 360

Public360 is the archive and case processing system used at the Norwegian School of Economics. This means that Tieto, which develops and operates Public360, will have access to the following personal data about your: name, personal ID number, student serial number, student number, semester and home address, and student and private email address.

10) TimeEdit AB

The Norwegian School of Economics uses the scheduling system TimeEdit to plan teaching activities and exams. TimeEdit AB, which develops and operates TimeEdit, will have access to the following personal data about you: name, gender, personal ID number, Studentweb user name and password, Studentweb PIN code, student number, semester and home address, mobile phone number, student and private email address, assessment registrations, study programme and master's degree programme option.

11) Kong Arthur

Personal data are transferred from FS to systems such as TimeEdit and Canvas to make it possible to use the systems in question. Kong Arthur, which develops and operates integration services that transfer data between systems, will have access to the following personal data about you: name, gender, personal ID number, Studentweb user name and password, Studentweb PIN code, student number, semester and home address, mobile phone number, student and private email address, assessment registrations, study programme and master's degree programme option.

12) NHHS – the student union at NHH

Each autumn, NHHS is given lists of new students that contain the students' name, student number, study programme, phone number and student and private email address.

13) Unit 4

The payment of semester fees at the Norwegian School of Economics is processed in Unit 4 – World Business. This means that Unit 4 will have access to the following personal data about you: name, personal ID number, student serial number, student number, two addresses and two email addresses (if this information is registered in FS).

14) Other universities and university colleges

– Applications for admission via the Norwegian Universities and Colleges Admission Service When you apply for admission to the Norwegian School of Economics via the Norwegian Universities and Colleges Admission Service, your application will normally be processed by the Norwegian School of Economics. If you have applied for admission to one or more other universities/university colleges, it is possible that they will process your application on behalf of all the universities/university colleges you have applied to. In that case, they will process and store personal data about you in connection with your application(s). Your application will primarily contain personal data that you yourself register in the Norwegian Universities and Colleges Admission Service's application portal.

- Consent to exchange of results

If you have achieved assessment results or degrees from a university/university college and wish to use these results in connection with an application for admission to another Norwegian university/university college, you can consent to exchange of results. As soon as you have given your consent, a case officer can obtain information about all your results from all Norwegian institutions that use FS. This means most universities and university colleges in Norway except BI Norwegian Business School. We refer to the institution's privacy statement for further information about the processing of your personal data.

- Recognition of studies abroad

If you have applied for recognition of education taken abroad, details relating to your application, including personal data, may be transferred to GAUS, which is a search service for recognition of foreign education. Other Norwegian universities/university colleges can search for and see personal data about you in GAUS. See the privacy statement for GAUS.

- In connection with sanctions relating to behaviour

In cases where it is registered that the Norwegian School of Economics has decided to impose a sanction on you, this decision will in some situations be sent to the register of excluded students (RUST). The grounds for imposing sanctions will be one or more of the following: use of false credentials, disruptive/troublesome behaviour, dangerous behaviour, gross breach of confidentiality, grossly indecent behaviour during practical or clinical training, cheating, attempted cheating, involvement in cheating, or exclusion following a suitability assessment. If you apply for admission to another Norwegian university/university college during the period of your sanction, your personal data will be sent to the university/university college in question. A small number of selected staff at this institution will then have access to your personal data. In some cases, this will also apply if you register for an exam. See the privacy statement for RUST.

15) NOKUT – the Norwegian Agency for Quality Assurance in Education

- Recognition of studies abroad

If you have applied for recognition of education taken abroad, details relating to your application, including personal data, may be transferred to GAUS, which is a search service for recognition of foreign education. The Norwegian School of Economics can search for and see personal data about you in GAUS.

16) BIBSYS/providers of other library systems

We will send personal data about you to BIBSYS/other library systems to allow you to become a borrower at the Norwegian School of Economics and use our library services. This will only be done once you have registered for the semester and paid the semester fee.

17) Statistics Norway (SSB)

There are several situations in which the Norwegian School of Economics will send personal data about you to Statistics Norway for statistical purposes. This applies to personal data relating to:

- your semester registration
- your exam result(s)
- your completed study programme(s)
- qualification(s) you achieve that form the basis for a diploma
- you and your right to study on a doctoral degree programme

18) NSD – Norwegian Centre for Research Data and the Database for Higher Education (DBH) There are several situations in which the Norwegian School of Economics will send personal data about you to NSD and DBH. This applies to personal data relating to:

- your application for admission to studies
- your semester registration, semester fee payments and course registration(s)
- exams you have taken
- qualifications you have achieved
- your exchange stay(s)
- whether you have taken the planned credits in accordance with your individual education plan

• you and your doctoral degree programme

19) NIFU – Nordic Institute for Studies in Innovation, Research and Education There are several situations in which the Norwegian School of Economics will send personal data about you to NIFU for research purposes. The personal data in question are related to your master's degree (in some cases your bachelor's degree) and your doctoral degree.

20) The Norwegian Directorate of Health

If you have completed a study programme that could qualify you for an authorisation or licence under the Health Personnel Act or the Act relating to Veterinarians and Other Animal Health Personnel, the Norwegian School of Economics will send personal data about you to the Directorate of Health/Register for Health Personnel (HPR). The personal data will include your name, personal ID number (11 digits), information about your study programme and the qualification you have achieved. This means that you do not have to apply for authorisation yourself after completing such a study programme.

21) Disclosure of personal data pursuant to the Freedom of Information Act In cases where the Norwegian School of Economics receive requests for access pursuant to the provisions of the Freedom of Information Act, the provisions of the Personal Data Act cannot limit the right of access in cases where the request concerns personal data. The Norwegian School of Economics may therefore send personal data about you to parties other than those mentioned in this privacy statement.

9) Security in relation to your personal data

The Norwegian School of Economics conducts regular risk and vulnerability analyses to keep your personal data in FS secure. In addition, security measures such as access control have been put in place to ensure that access to your personal data is limited to the staff who need it. All registrations are logged.

10) Your rights

Right to information and access

You have a right to receive information about how the Norwegian School of Economics processes your personal data. This privacy statement has been produced to provide the information you are entitled to receive.

You also have the right to see/access all personal data registered about you by the Norwegian School of Economics. In addition, you have the right to request a copy of your personal data if you so wish.

Right to rectification

You have a right to have inaccurate personal data about you rectified. You also have a right to have incomplete personal data about you supplemented. Please contact us if you think that we have registered inaccurate or incomplete personal data about you. It is important that you give grounds and, if relevant, document why you think that the personal data are inaccurate or incomplete.

Right to restriction of processing

In certain cases, you may have a right to request that the processing of your personal data be restricted. Restriction of processing means that the personal data will still be stored, but the possibilities for further processing are restricted.

If you think that the personal data are inaccurate or incomplete or have submitted an objection to their processing (see further information below), you have the right to demand that the processing of your personal data be temporarily restricted. This means that processing will be restricted until we have corrected your personal data, if relevant, or considered whether your objection is justified.

In other cases, you may also demand more permanent restrictions on the processing of your personal data. In order to be entitled to demand restricted processing of your personal data, the conditions set out in the Personal Data Act and the GDPR Article 18 must be met. If you contact us to request restriction of processing of your personal data, we will consider whether the statutory conditions are met.

Right to erasure

In some cases, you have the right to demand that we erase personal data about you. The right to erasure is not an unconditional right, and whether you have the right to have data erased must be considered in light of the applicable data protection legislation, i.e. the Personal Data Act and the GDPR. Please contact us if you would like to have your personal data erased. It is important that your request includes why you want your personal data erased and, if possible, what personal data you wish to have erased. We will then consider whether the statutory conditions for demanding erasure are met. Please note that legislation allows us to make exemptions from the right to erasure in some cases.

This includes cases where we have to store personal data to fulfil a duty pursuant to the Act relating to Universities and University Colleges or on the grounds of public interest such as archiving, research or statistical purposes.

Right to object

You may have the right to object to processing if you have a special need to have the processing stopped, for example if you have a need of protection, a confidential address or similar. The right to object is not an unconditional right, and it depends on the legal basis for the processing and on whether you have a special need. The conditions are set out in the GDPR Article 21. If you object to the processing, we will consider whether the conditions for objecting are met. If we conclude that you have the right to object to the processing and that your objection is justified, we will stop the processing, and you can also demand that the information be erased. Please note that there are cases where we may nevertheless make exceptions from erasure, for example if we have to store the personal data to fulfil a duty pursuant to the Act relating to Universities and University Colleges or to safeguard important public interests.

Right to complain about the processing

If you feel that we have not processed personal data in a correct or lawful manner, or if you feel that you have been unable to exercise you rights with us, you have a right to complain about the processing. You can find information about how to contact us in section 11.

If we do not uphold your complaint, you have the possibility of filing a complaint with the Norwegian Data Protection Authority. The Data Protection Authority is responsible for ensuring that Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

11) Contact information

The data controller

The Norwegian School of Economics is the data controller for personal data in the Common Student System (FS), cf. the GDPR Article 4 (7).

If you wish to exercise your rights as described in section 10 above, please contact <u>maj</u>-<u>brit.iden@nhh.no</u>. We will consider your enquiry without undue delay, and within 30 days at the latest.

Data protection officer

The Norwegian School of Economics has a data protection officer who is tasked with safeguarding the data protection interests of the school's students and employees. You can contact the data protection officer for administrative processing of personal data at the Norwegian School of Economics by sending an email to: <u>monica.oen@nhh.no</u>

Service provider

Unit – the Directorate for ICT and Joint Services in Higher Education and Research is the service provider for FS, which means that Unit develops and administers FS and is responsible for its day-today operation. In the course of this work, selected Unit personnel will have access to all personal data registered in FS, and thus also personal data sent to and from FS.

Contact information for Unit: <u>fs-sekretariat@fsat.no</u>