

# Privacy statement for Nomination

Last amended: 21 June 2018

## 1) Nomination in brief

Nomination is a web application where external institutions can nominate exchange students for Norwegian educational institutions.

Nomination is linked to the student administrative system Common Student System (FS). This means that data that are registered in **Nomination** are stored in FS. Data from FS are reported to a number of parties/enterprises for various purposes. [See the privacy statement for FS.](#)

## 2) About the privacy statement

This privacy statement describes how the Norwegian School of Economics processes your personal data in Nomination. 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 are 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 processing personal data in Nomination

### Purpose

The purpose of processing personal data in Nomination is to be able to identify the person who nominates a student, as well as to register that a student has been nominated for an exchange and identify the student.

It is necessary to identify the student both so that the institution that will receive the information can know which student it relates to, but also to be able to inform the student that he/she has been nominated and that he/she must register a further application for exchange.

### Legal basis

The Norwegian Personal Data Act and Personal Data Regulations apply to Nomination. The legal basis for processing personal data in Nomination is regulated in an agreement between you as an employee and your employer.

## 5) What personal data are processed in Nomination, and how long will we store your personal data?

Nomination does not contain any sensitive personal data.

When you log in to Nomination, we will store your email address, the institution number of the institution you logged in with, your IP address and the time at which you logged in. This information is stored in order to be able to assist you if you need help using Nomination.

Your personal data related to your log-ins will be stored for 12 months before being erased. Personal data about students you nominate will be sent to the student administrative system Common Student System (FS).

## **6) Automated case processing**

Your personal data in Nomination will not be subject to automated case processing or profiling.

## **7) Disclosure of 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:

1) Unit – the Directorate for ICT and Joint Services in Higher Education and Research  
Nomination is developed and provided by Unit. Unit employees who need it to perform their work will be given access to your personal data in order to be able to provide user support and, if relevant, rectify errors in the service.

2) The University Center for Information Technology (USIT) at the University of Oslo (UiO)  
Nomination is operated by USIT at UiO. USIT employees who need it to perform their work will be given access to your personal data in order to be able to provide user support and, if relevant, rectify errors in the service.

3) UNINETT AS  
You log in to Nomination using the log-in solution FEIDE. FEIDE is developed and delivered by UNINETT AS. UNINETT employees who need it to perform their work will be given access to your FEIDE name and IP address in order to be able to provide user support and, if relevant, rectify errors in the service. Your personal data will be erased from FEIDE after six months.

## **8) Security in relation to your personal data**

The Norwegian School of Economics conducts regular risk and vulnerability analyses to keep your personal data in Nomination 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.

## **9) 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 your rights with us, you have a right to complain about the processing. You can find information about how to contact us in section 10.

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.

## **10) Contact information**

### **The data controller**

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

If you wish to exercise your rights as described in section 9 above, please contact [maj-brit.iden@nhh.no](mailto:maj-brit.iden@nhh.no). 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: [monica.oen@nhh.no](mailto:monica.oen@nhh.no)

### **Service provider**

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

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