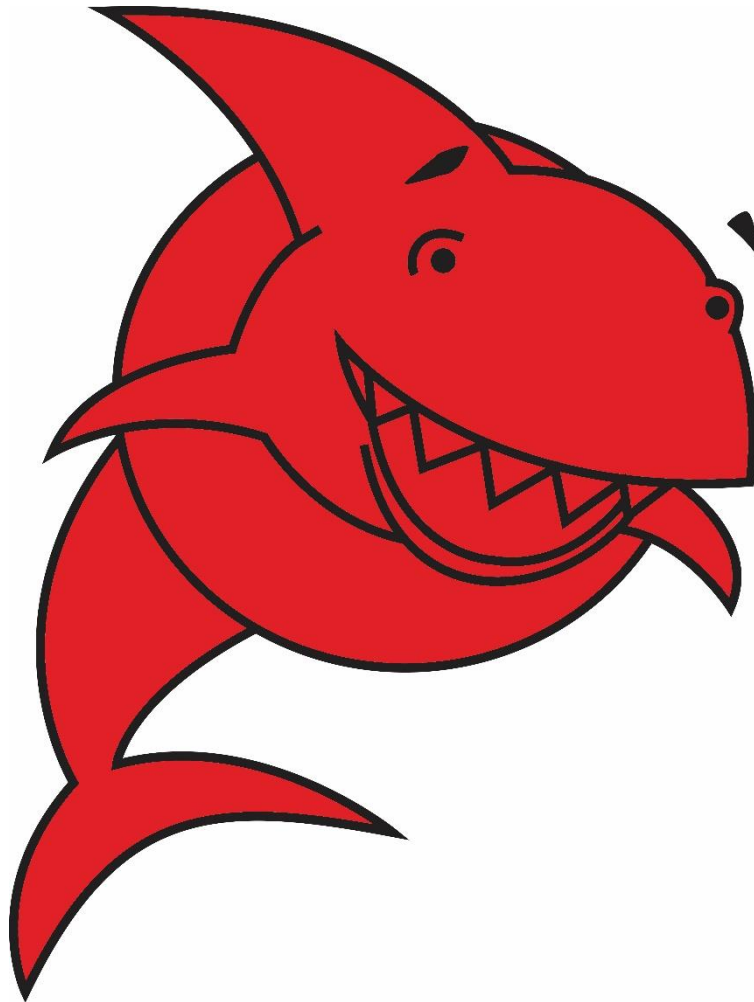


# Privacy Policy



**M.S.Z.V. Tiburón**

Written by Board 2019-2020



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## 1. Introduction

The General Data Protection Regulation (GDPR) entered into force on 25 May 2018. It is a privacy law valid throughout the European Union. As a result of the GDPR, the protection of personal data is regulated the same way in all EU Member States, meaning the same rules apply in each Member State. The GDPR concerns the processing of personal data (what is and is not allowed), and it also aims to create awareness regarding the processing and safeguarding of personal data.

## 2. Registering and Processing of Personal Data

### 2.1. Data Matrix

The following data is registered by M.S.Z.V. Tiburón during the membership registration and processed in our administration. This data is collected through the sign-up form, which is found on our website. Personal data can be modified by sending an email to [mszvtiburon@maastrichtuniversity.nl](mailto:mszvtiburon@maastrichtuniversity.nl), for example if a member has moved to a different address or has a new bank account number.

The table below indicates which data is registered and why. Moreover, it shows what the reason is for collecting the data and for how long the data is stored.

Goal	Which Data?	Reason	Duration of Storage	Recipients
Member administration	<ul style="list-style-type: none"> <li>- First name</li> <li>- Last name</li> <li>- Address</li> <li>- Phone number</li> <li>- Email address</li> <li>- Gender</li> <li>- Nationality</li> <li>- Clothing size</li> <li>- Date of birth</li> <li>- Student number</li> <li>- Study programme</li> <li>- Swimming experience</li> <li>- KNZB start number</li> <li>- Start date of membership</li> <li>- End date of membership</li> <li>- Bank account details</li> </ul>	Performance of obligations under the membership agreement	For the entire duration of the membership, and until one year after the membership has been terminated.	- Conscribo



Sending the newsletter	- Email address	Performance of obligations under the membership agreement	For the duration of the membership. Data are deleted as soon as the membership is cancelled	- LaPosta
Financial administration	- First name - Last name - Address - Bank account details	Performance of obligations under membership agreement	Financial data is stored for maximum 7 years after termination of the membership.	- Conscribo
Activity administration	- First name - Last name - Phone number - Email address	Administering attendance of events for financial and communicative purposes	Until the end of the academic year	N/A
KNZB administration	- First name - Last name - Start number (if applicable) - Date of birth	Registration with the KNZB for participation in competitions	Data are saved up until one year after the membership has been cancelled	- Sportlink - SPLASH

## 2.2. Registration of Personal Data

M.S.Z.V. Tiburón processes personal data using the following systems:

### Excel

The member list of M.S.Z.V. Tiburón, as well as a separate list of cancellations of membership, is maintained through Excel. This member list is also sent to MUSST, which checks if all members in possession of a UM Sports card. For this purpose, the first and last name, birthdate and student number are saved in the Excel file. The list of cancellations contains the first and last name of the member, plus the end date of the membership.



### SurfDrive

The Excel file containing the member list is saved in SurfDrive, a secured online environment. It is accessible through the University. This means it is accessed by logging in with the association's email address and password, which only the current board of the relevant academic year has access to. The Excel file containing the cancellations of the academic year is also stored in Surfdrive.

### Conscribo

Conscribo contains the full member administration, which means all the personal data entered in the membership registration form. Moreover, Conscribo is used for the financial administration of M.S.Z.V. Tiburón. It is the accountancy programme used by the treasurer for the administration of debtors and creditors. The names of the members and their bank accounts are processed in Conscribo in order to perform the direct debits and reimbursement for expenses made on behalf of M.S.Z.V. Tiburón. The association has made a processing agreement with Conscribo.

### Sportlink

Sportlink is the programme for member administration of the KNZB (Dutch swimming federation). This programme allows us to request or sign out a start number or request a start number for a day. Moreover, it is the programme used to calculate the contribution to be paid to the KNZB.

### SPLASH

SPLASH is a software programme used for the administration for competitions. Many competitions are organised using this programme, which processes the following personal data: first and last name, start number and date of birth. This personal data are shared with the participating and organising associations within the swimming federation.

## *2.3. Board*

The board consists of the following functions:

### President

When organising the Batavierenrace, the president has to process first and last name, phone number, email address. Additionally, the president collects information from members who volunteer to be a mentor during the INKOM.



#### Secretary

The secretary is in charge of the member administration. To keep this up-to-date, all data listed in the matrix as needed for member administration is processed through Conscribo and in a securely stored Excel file. For the monthly newsletter, only the email addresses of members are put in an Excel file and processed through LaPosta. Furthermore, the email addresses are used for general communication with the members via email.

#### Treasurer

The treasurer processes (financial) personal data stored in Conscribo, which is required for sending invoices for the direct debit. Costs for contribution will be charged this way, as well as (where applicable) costs for activities, competitions and purchased merchandise.

#### Activity Coordinator

The activity coordinator handles personal data (first and last name, phone number, email address) when organising activities, among others to create group chats and make attendance lists.

#### Swimming Coordinator

The swimming coordinator is in charge of the registration of members for (swimming) competitions. This requires the swimming coordinator to process a member's first and last name, date of birth, email address and (if applicable) the KNZB start number. This data is processed through Sportlink and SPLASH.

#### *2.4. Confidentiality*

Only board members of the current board of M.S.Z.V. Tiburón have access to personal data and are allowed to process it. They are under an obligation of confidentiality unless there is a legal or reasonable necessity to provide the data.

### **3. Registration Procedure**

To become a member of M.S.Z.V. Tiburón, the potential member needs to have a UM Sports card. More information on who is eligible for a UM Sports card can be found on the UM Sports Webshop and/or the HR of M.S.Z.V. Tiburón. A list of members is sent to Sports Council MUSST to verify whether the person has a valid UM Sports card. This list contains the first and last name, the date of birth, and the student number of the member.



#### 4. Deregistration Procedure

A member can cancel their membership by sending an email to [mszvtiburon@maastrichtuniversity.nl](mailto:mszvtiburon@maastrichtuniversity.nl), in which the member states their desire to cancel their membership for the upcoming academic year. At this point in time, the association is still in possession of all personal details of the member. As soon as the secretary has finished the deregistration procedure, a confirmation will be sent to the email address of the person. This email address is the one they provided us with in the sign-up form upon registering as a member. After cancellation of the membership, the personal data of the former member will be kept for up to one year after the membership has been terminated.

#### 5. Exchange and Amendment of Personal Data

##### 5.1 Internal

Upon registering as a member of M.S.Z.V. Tiburón, an account is created for this person in Conscribo using the information provided by said person in the sign-up form. If a person wishes to amend their personal data, such as their address or bank account information, they can send an email to [mszvtiburon@maastrichtuniversity.nl](mailto:mszvtiburon@maastrichtuniversity.nl) or send a text to the secretary or the treasurer.

Within M.S.Z.V. Tiburón, members have the opportunity to become an 'active member'. Being an active member means the member becomes part of a committee and in this way contributes to the association. This can be through helping with the organisation of activities, helping with the creation of the club magazine, promoting the association on social media, et cetera. In general, the committees do not have access to personal data. However, two committees do use pictures on which members may be shown. These committees are the following:

##### PR Committee

The PR Committee promotes the association on social media, which is done by posting pictures and videos of members attending events. Upon registration, the member consents to pictures being taken of them at events they attend as member of M.S.Z.V. Tiburón. Moreover, consent is asked during the sign-up of each specific event the member signs up for. In any case, additional consent may be asked before posting if the member is very clearly visible in the image, and the member has the right to request a picture to be taken down after publication.

##### HAAI Committee

The HAAI Committee is in charge of publishing the club magazine at least 3 times per year. The club magazine contains, among other things, stories from members about the activities and events they attended with M.S.Z.V. Tiburón. Pictures are posted along with these stories for an impression of the atmosphere. Members may be shown in these pictures. As mentioned



before, upon registration, the member consents to pictures being taken of them at events they attend as member of M.S.Z.V. Tiburón. Moreover, consent is asked during the sign-up of each specific event the member signs up for. In any case, additional consent may be asked before posting if the member is very clearly visible in the image. Often, the member who writes the story provides the pictures to be added to the photos from their private collection.

## *5.2 External*

M.S.Z.V. Tiburón has close contact with several external parties which are important to mention: Stichting NSZ, MUSST, and the KNZB. The Stichting NSZ makes it possible for M.S.Z.V. Tiburón to participate in the Nationale Studenten Zwem Kompetitie (NSZK; National Student Swimming Competition). To avoid fraud, Stichting NSZ regularly conducts checks of the lists of participants.

MUSST is the Sports Council of Maastricht University. Members of M.S.Z.V. Tiburón need to be in possession of a valid UM Sports card with the basic membership and the sports add-on. By exchanging personal data of the members (first name, last name, date of birth and student number) with the MUSST, the validity of the membership can be verified.

We exchange personal data with the KNZB for the purpose of participating in competitions or for the request of start numbers.

## **6. Digital Media**

Various online platforms are used for the promotion of activities and for the spreading of information. M.S.Z.V. Tiburón strives to provide information as correctly, complete and up-to-date as possible.

### *6.1 Website*

The website of M.S.Z.V. Tiburón ([www.msztiburon.nl](http://www.msztiburon.nl)) is built in Wordpress, in cooperation with hosting provider SiteGround. The board of M.S.Z.V. Tiburón manages and updates the website. Interested persons can find basic information of the association on the website. Aside from that, one can find contact details and links to our own external digital platforms, sponsors and other external parties.

M.S.Z.V. Tiburón retains the right to amend, add to or remove any information mentioned on the website. Moreover, M.S.Z.V. Tiburón is not liable for any possible direct or indirect damage resulting from the website and/or the information published on the website. The use of external links on the website may result in one leaving the M.S.Z.V. Tiburón website. M.S.Z.V. Tiburón is not responsible for and has no influence over the content of websites of external parties linked on our website.





### *6.2 Association's Email*

The standard way of spreading information from M.S.Z.V. Tiburón is the association's email [mszvtiburon@maastrichtuniversity.nl](mailto:mszvtiburon@maastrichtuniversity.nl). Through the association email, (potential) members receive information from M.S.Z.V. Tiburón about try-outs, competitions, activities, any special comments regarding practice and other general information. Moreover, the association email serves as main mode of communication between the board and MUSST, Stichting NSZ, KNZB, fellow student sports associations and other external parties.

### *6.3 Social Media*

Next to the website and email, M.S.Z.V. Tiburón uses and can be contacted via two social media platforms, which will be explained in more detail in the following section.

#### Facebook

On Facebook, M.S.Z.V. Tiburón makes use of two pages: the open/public page (visible to anyone) and the closed group (only visible for members who are part of this group). The public page provides people with an interest in the association with contact details, practice times, but also highlights of the association (such as the placement of the association in the competition rankings). The closed group is only accessible when a member's request to be added to the group has been approved by the admins (current board). The admins ensure only (former) members are part of this group. The closed group provides (former) members information on upcoming events, both internal and external, results of competitions, pictures, polls for participation in technique practices, et cetera. Members are also free to share events, pictures and news.

#### Instagram

M.S.Z.V. Tiburón can be found on Instagram under the username 'mszvtiburon'. Through the use of pictures and videos with an additional message, members and other interested parties stay updated on what is going on within the association. For example, pictures of the association at activities, parties and competitions are posted to the 'Story' or the page of the association. The website can be accessed via the link in the bio.

M.S.Z.V. Tiburón is not liable for any direct or indirect consequential damage resulting from the use of the social media platforms and/or the information published thereon. The use of external links on the various platforms can result in leaving the concerned platform. M.S.Z.V. Tiburón is not responsible for and has no control over the content of the websites of third parties to which our social media platforms are connected.



## 7. Misuse of Personal Data

M.S.Z.V. Tiburón does everything in its power to ensure the personal data discussed in this document do not come into the hands of third parties without authorised access to these details. Nevertheless, should this for whatever reason occur, this will constitute a so-called data breach. As soon as the existence of a data breach is established, this should first be notified to the current board (in case the breach occurred outside the board) and next to that, it has to be notified within 72 hours to the watchdog, the 'Autoriteit Persoonsgegevens' (AP). The latter will be done by the current board. The notification of a data breach is done through <https://datalekken.autoriteitpersoonsgegevens.nl/actionpage?0>. Notifications of data breaches should at all times be documented by the association. This way, the AP can ascertain whether the association acted conform the duty to notify. The notification of the data breach should contain the following information:

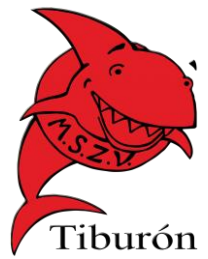
- The nature of the breach
- The name of the authority/authorities which can provide more information on the breach
- A brief description of the presumed or ascertained consequences of the breach
- A brief description of the measures proposed or taken by the association to limit the results of the breach

Aside from the aforementioned notification, the persons concerned (i.e. whose personal data were leaked) should be informed where necessary. This should only happen when it is likely the breach will have unfavourable consequences for the person in question. This notification should contain the following information:

- The nature of the breach
- The name of the authority/authorities which can provide more information on the breach
- A brief description of the measures proposed or taken by the association to limit the results of the breach

Another form of misuse of personal data is the unauthorised use of personal data. This refers to the use of the data in another way or for a purpose other than permitted pursuant to this policy. Unauthorised use of personal data can occur both on purpose or by accident. Accidentally unauthorised use of personal data can occur when the users are not aware of the rules concerning the protection and use of personal data. Purposely unauthorised use can occur when the users are aware of the rules concerning protection and use of personal data but they deliberately or purposely violate these rules. Misuse occurs when an unauthorised person obtains and uses personal data, an authorised person uses personal data for another purpose than allowed, and/or when there is a use of personal data which were not allowed to be used or registered pursuant to the policy.

Misuse of personal data shall, depending on the severity, lead to (one of the) following measures: warning, deprivation of access to personal data, termination of a function and/or task, and lastly to termination of registration. Moreover, a thorough examination will take place to ascertain how this misuse can be prevented in the future and how any possible damage can be compensated.



## 8. Questions and Complaints

For questions and/or complaints regarding the privacy policy of M.S.Z.V. Tiburón, one can contact the current board via [mszvtiburon@maastrichtuniversity.nl](mailto:mszvtiburon@maastrichtuniversity.nl). Every question and/or complaint will be registered to facilitate its handling. M.S.Z.V. Tiburón retains the right to change and amend this policy where necessary.