

Privacy Policy of E.S.D.V. Footloose

1. Introduction

Eindhoven Student Dance Association Footloose (Chamber of Commerce number 40239742), hereinafter Footloose, values the privacy of its members. We handle personal data with the utmost care. Using this document we inform members about the state of affairs regarding the registration, use, mutation, protection and storage of data, both online and offline. It also describes what happens if it is (unintentionally) misused. This policy helps Footloose to handle personal data more consciously.

1.1 Parties involved

The data of all members is collected by Footloose. This data may be viewed by board members, the archive committee, the ICT committee, the financial audit committee and the advisory board. For some justified purposes, volunteers are also allowed to view certain data. Some data is also shared with third parties and partners, should this be of (financial) importance to the association. These parties include TU/e, Scala, and CKE. Members are defined as persons who have paid the membership fee to the association for the given association year. Former members include persons who have not paid membership fees since the beginning of the association year.

1.2 General Data Protection Regulation

The rules in this document apply for the entire association and are in accordance with Dutch legislation for personal data, called the General Data Protection Regulation (GDPR). Under this law, Footloose is allowed to process the necessary "ordinary" personal data if it has the proper consent of its members.

The Personal Data Protection Act sets requirements for organizations that manage data files, such as a membership administration. These requirements are:

- the right of access;
- the right to rectification and supplementation;
- the right to be forgotten;
- the right to data portability;
- the right to restriction of processing;
- rights related to automated decision-making and profiling;
- the right to object.

2. Collect data

The register below contains the data that Footloose collects from its members, both upon registration and during membership.

2.1 Registration personal data

Footloose collects personal data through the registration form on the website. This data (grey and white) is shown in the table below, along with other data that is collected (blue).

All data classifies "ordinary" personal data. According to the GDPR, these may only be collected and processed when at least one of a number of conditions is met. Footloose meets this requirement

because certain information is necessary for the performance of vital matters for the association and requests permission for the collection of the other data.

After completing the registration form, the member will receive an overview of the entered data. The member is asked if this is correct and if the member consents to certain optional information and includes a link to this document so that it is clear for what and how the data will be used. All members are obliged to fill in this form.

Information	Mandatory	Optional	Visible by member	Editable by member	Retention period
First name	x		x	x	8 years
Last name	x		x	x	8 years
Address	x		x	x	Until unsubscribing
Email address	x		x	x	8 years
Day of birth	x		x	x	Until unsubscribing
Language	x		x	x	Until unsubscribing
Study body*	x		x	x	Until unsubscribing
Campus card number		x	x	x	Until unsubscribing
Phone number		x	x	x	Until unsubscribing
Gender		x	x	x	Until unsubscribing
Study		x	x	x	Until unsubscribing

*Whether or not to study at the TU/e.

Table 1: Register of personal data of E.S.D.V. Footloose (part 1 website registration).

Information	Retention period
IBAN	8 years
Key authorisation	Until unsubscribing
Dance courses followed + dance partners + roles	8 years
BHV diploma	Until unsubscribing
Photos	Until unsubscribing
Financial transactions between member and Footloose	8 years
Status of payments to Footloose	8 years
Presence (at dance classes, activities, etc)	Until the end of next association year

IP address	8 years
Profile picture	Until unsubscribing

Table 2: Register of personal data of ESDV Footloose (part 2 other media)

2.1.1 Required

The data marked in grey are necessary for the performance of vital tasks of the association. Members who take courses should be carefully informed about formal matters within the association and kept informed through email. If members do not wish to receive this information, they can indicate this to the board. The email address is also used for verification that the member is a TU/e student. A member's address and study will be collected for sponsorship application.

2.1.2 With consent

Some information is not necessary for the performance of vital tasks. Photos taken during events may be published for promotional purposes and posted to the Footloose Photo Gallery. A member's phone number can be used for direct communication by the board.

This permission is requested when registering as a member on the website and is stored in the member database. A checkbox must be ticked when registering. This permission is stored, along with the time and location. For this, the IP address is stored.

If the member wishes to withdraw this permission, this can be indicated to the board.

2.2 Cookies

Cookies are set on the WordPress website for logging in within WordPress and using Google Analytics. The user must give permission for this once through the notification that appears when he visits the website.

2.3 Finance

All the information below is collected and authorized to allow Footloose to perform its vital functions.

2.3.1 Bookkeeping

Footloose's accounts consist of documents that record the names, IBANs and transactions between Footloose and its members. This bookkeeping is stored locally on the computer of the treasurer who is in office at that time. The bookkeeping consists of the general ledger, debtor and creditor administration, membership administration, purchase and sales administration and stock administration. Footloose is legally obliged to keep this information up to date.

2.3.2 Course registrations

Part of the financial administration is a document that keeps track of for which courses each member registered in which semester. This includes the email address of the member, the date of registration, any dance partners of the member, whether the member dances as a leader or follower in case of a partner dance, whether the member was a student at the time of registration, how much the member would have to pay for the courses and how much the member actually paid.

This document also keeps track of whether the member has been deregistered or rejected from the course and whether the member has received a refund and the amount of this possible refund. This document is used to understand how many students a course has, to verify whether a member paid the correct amount of course fees, and to create the checklists for the payment of the course fees. Footloose

does this because collecting course fees is vital for Footloose to function. This document can only be viewed by the board in office.

2.3.3 Door checklists

At least twice per semester, it is checked whether all people who are present at that time are also registered and paid for the given course. This is done with a list per course containing all names of registered members, and how much these members still have to pay. Besides the financial audit committee and the board, this list is also seen by volunteers who carry out the check.

2.3.4 Attendance lists

For an activity organized by Footloose, there is sometimes an attendance list that shows the names of the members who have signed up for the activity, whether the member is actually attending, how much these members have to pay for the activity, how much the members have already paid and which payment method they used. These lists are used to check whether all participants of the activity have also registered and paid. The payment method is kept so that the treasurer can check afterwards whether there is enough money in the cash register in the case of cash payment. This information is viewed by the treasurer and the volunteers who help with the check.

2.3.5 Declaration forms

When a member purchases something for Footloose, this can be declared via a declaration form. This form contains the name of the member, the date of the declaration, the member's IBAN, the member's signature, what has been purchased, the amount to be declared and the receipt(s) of the purchase. These forms are maintained to verify that transactions made by the treasurer to members for declarations are in the best interest of Footloose. This is done to prevent fraud. These forms will only be viewed by the board in office and the financial audit committee.

2.3.6 Invoices

Invoices that Footloose sends to third parties will include the billed person's name, that person's email address, the billed subject and the associated amount and date the invoice was sent. Footloose is required by law to keep and store these. Invoices that are received are also saved. The information contained in this depends on the creator of the invoice.

3. Use of personal data

3.1 Communication

Members' contact details are used to keep them informed about important association matters. For example, newsletters and surveys are sent to members from the board. The Mailchimp service is used for sending emails. This means that members' names and email addresses are shared with Mailchimp. The data is not used for Mailchimps data science projects, but tracking cookies are sent with emails to keep track of who opens the messages. For Mailchimps privacy policy see: <https://mailchimp.com/legal/privacy/>.

3.2 Receivers

Only directly involved parties will have access to the relevant data. This could be the financial audit committee, committees, TU/e, volunteers within the association or third parties. The financial audit committee is obliged to check the bookkeeping and declarations but will not have access to the

bookkeeping itself. When the tax authorities request data for verification, this will also be shared. The board decides whether it is necessary to share member data with the party concerned.

3.2.1 Partners

In order to apply for grants and subsidies, certain information from members must be disclosed to authorities. This differs per year and per institution where the subsidy is requested from. The following data is now disclosed to the CKE for all members: address details, first and last name, association function and length of membership. The privacy policy of the CKE can be found at <https://cke.nl/privacybeleid>. Furthermore, should Footloose obtain more sponsorship partners, Footloose will only share the necessary personal data. This falls under the legitimate interest of the association.

3.2.2 Third parties

Because Footloose is part of Scala and the TU/e, Footloose is required to have a certain ratio of TU/e students. The Fontys student ratio is also registered. No names are included and only the anonymous data about student percentage of the entire association is sent to both the above-mentioned parties.

Furthermore, members' campus card number in combination with their name is used for authorization of the campus card so that the member can gain access to the building and request key access to rooms and halls in the Luna building. This information is shared with the TU/e. Scala and TU/e are aware of members having a BHV certificate that has been applied for via Footloose.

4. Modification of personal data

If certain information has changed, or if it is no longer desired to share, the member can always indicate this to the board and the greatest possible care will be taken to ensure that this information is adjusted or removed everywhere.

4.1 Change by members

The member can send an email to the board or change their details themselves via the website.

4.2 New association year

When the new association year starts, a member must reactivate their membership via the website before being able to register for courses. Members who have not re-enrolled are deregistered as members.

5. Retention of personal data

The data is stored in different locations and has a different retention period.

5.1 Retention period

The retention period differs between data. Some information will be removed once someone is no longer a member of Footloose. Certain information (financial nature, general member data or association documents) will be kept for longer because this is legally laid down in the Dutch General Tax Act (Algemene Wet inzake Rijksbelastingen). Unless stated otherwise by the member, this information will be kept for 8 association years after registration of a member. For each of the categories of personal data, it is noted in the register under section 2.1 how long it is stored.

5.2 Storage location

Paper-based data is only used temporarily (such as attendance lists) but is digitized and discarded as confidential paper waste. Furthermore, the website only stores data of current members. As soon as someone is no longer a member, the data is automatically removed from the website. The databases used are the personal laptops of board members, a locked cabinet in the board garden in the Luna building at the TU/e campus, the archive room in the Luna building at the TU/e campus and a TransIP Stack. For TransIP Stack's privacy policy, see:

<https://www.transip.nl/legal-and-security/privacy-policy/>. Furthermore, backups of the website are made on a regular basis. These are stored on the TransIP Stack account of the ICT committee. Only the ICT committee can access this.

6. Protection of personal data

To ensure that personal data is handled with care, the following guidelines are followed in terms of protection. There is also a duty of confidentiality with committees that work with personal data.

6.1 Databases

The locations mentioned above are each carefully protected. Board members who have data stored locally should regularly change their passwords, make backups, have decent antivirus software on their laptops and use an access code for local files.

The cabinets in the board garden and the archive room in the Luna building are closed by means of a lock. Respectively, only members of the board in office and relevant Scala parties, as well as the building management and security of the TU/e, can access the relevant key.

Furthermore, in online environments (Cloud storage) and in the accounting software, a password change takes place at least yearly, when the board is changed. So only the board in office will have access. Furthermore, only storage on Dutch territory is used.

6.2 Necessity

To ensure that the privacy of the members is guaranteed, only information is collected and stored that is strictly necessary and/or for which permission has been given.

6.3 Website

To ensure that data on the website is sufficiently secured, only the ICT committee and the board in office have access to the data stored via WordPress. All plugins used are regularly updated to ensure security by the ICT committee.

Footloose uses an Instagram Feed plugin to display social media content on the website. As a result, the website makes requests to Instagram's servers in order to get the data to populate the feed(s) and to display images and videos. These requests make members' IP address visible to Instagram, that may use it in accordance with their data privacy policy: <https://help.instagram.com/519522125107875>.

6.4 Confidentiality

Parties that work with personal data (financial audit committee, ICT committee and archive committee) sign a confidentiality statement. These statements are kept with date.

7. Misuse of personal data

If, despite this care, something happens to the personal data of members, it is important that this is investigated and assessed as soon as possible. The severity of the leak determines further actions.

7.1 Data breach

If member data ends up where it doesn't belong, it needs to be investigated and precautions taken for future situations. It must also be investigated whether this must be reported to the relevant members and to the Dutch Data Protection Authority. This shall be done within 72 hours. A plan of action can be found in the Data Breach Protocol.

7.2 Redundant

If data becomes redundant, the board ensures that this information is no longer stored.

7.3 Complaints

If members do not agree with the registration, storage or protection of their data or part of it, they can always notify the board about this. They also have the right to report this to the Dutch Data Protection Authority. Footloose will make every effort to resolve these issues as quickly and effectively as possible.