### Privacy Notice for the Common Student System (FS)

This Privacy Notice describes how Kristiania processes your personal data in the student administrative system, the Common Student System (FS) if you are a current or former student at Kristiania. This also applies to course participants and PhD candidates.

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### 1) Brief information about the Common Student System (FS)

The Common Student System (Felles studentsystem, FS) is a study administration system developed for universities, scientific colleges, and national university colleges. FS is developed by Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research. The system is also available to private university colleges. When you study at Kristiania, your personal data will be registered, processed, and stored in FS.

A number of applications are associated with the student administrative system FS. That means that data entered into these applications is also stored in FS. Data in FS is reported in various contexts to a number of parties/enterprises.

### 2) What is a privacy notice?

This privacy notice describes how Kristiania processes your personal data using the FS data system. The purpose of this privacy notice is to inform you of which personal data we process, how the data is processed, who is responsible for the processing, your rights, as well as who you can get in contact with.

### 3) What is considered personal data?

Personal data refers to all forms of data, information, details and assessments that can be linked to you as an individual. The crucial factor in determining whether data is considered personal data is whether the data can identify a specific individual.

Data that alone cannot be linked to an individual may, in cases where the data occurs together with other data, constitute personal data.

### 4) The purpose 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, course participant or PhD candidate and to fulfil Kristiania's duties and obligations under the University and University Colleges Act/Tertiary Vocational Education Act.

The processing of personal data in FS is, for example, necessary in order for Kristiania to

- perform the necessary administrative duties associated with your studies and you as a student
- document the results and qualifications from your studies

### Legal basis

The legal basis for processing is Section 4-15 of the University and University Colleges Act (Sections 9 and 15 of the Tertiary Vocational Education Act for the Professional College) and the GDPR, Article 6, no. 1 c and no. 3 b. The processing is necessary to comply with the provisions set down in the University and University Colleges Act. The processing also takes place to enable Kristiania to safeguard your interests as a student in the best possible manner. In certain cases, Kristiania has also elected to supplement the legal basis using declarations of consent for the processing of certain types of data.

### 5) What personal data is processed in FS?

No sensitive personal data relating to you is currently stored or processed in FS.

The following personal data may be processed in FS: profile information (such as your name, personal identification number/D number/S number (11 digits), gender, contact details, information about your background, native language, photo), application details, consents you have provided, status (such as residence permits and police certificates where relevant), semester registration details, invoice details and information about study programmes and courses.

Your personal data may be obtained from:

- Yourself via the Kristiania application portal.
- Yourself via EVUweb
- Yourself via Studentweb
- The National Diploma Registry (NVB)
- Other universities/university colleges
- The common contact register (KORR)
- Other people who register details about you in EVUweb
- Other people who register details about you in Nomination
- Case managers at Kristiania
- The Norwegian State Educational Loan Fund
- Digital examination systems
- Fagpersonweb
- User administration systems
- The institution's finance system

### **Voluntary registrations**

- Yourself via the Kristiania application portal
- Yourself via EVUweb
- Yourself via Studentweb

Registering your personal data in the Kristiania application portal, EVUweb and Studentweb is voluntary, but we may not be able to process your applications without your personal data. In the Kristiania application portal and EVUweb, you can register your data in connection with applications for study programmes/course registrations. In Studentweb, you can register information about yourself in connection with applications for study programmes, register information about your background, register for teaching and examinations, as well uploading applications and documents.

Such data may be necessary to enable us to process your applications and for you to study at Kristiania.

## • The National Diploma Registry (NVB)

If you apply for admission to Kristiania via the Kristiania application portal, you can also consent to us obtaining your personal data from the National Diploma Registry. The National Diploma Registry includes most electronic diplomas from upper secondary schools issued from the year 2000 onwards. If you consent, we will obtain your name, personal identification number (11 digits), the name of the school, as well as your subjects and grades.

• Other universities/university colleges

If you apply for admission to Kristiania and you have achieved qualifications at another university/university college that also uses FS, you can consent to the exchange of results. If you provide consent, one of our case managers may obtain all your results from all Norwegian institutions that use FS. In practice, this means most universities and university colleges in Norway, with the exception of the Norwegian Business School, BI. We will refer to the institution's privacy notice for further information about the processing of your personal data.

• RUST - the National Student Exclusion Register

If a Norwegian educational institution has decided to sanction you and such sanction(s) also affect your applicant/student relationship with other Norwegian educational institutions (subject to legal basis in Sections 3-7(8), 4-8(1) to (3) or 4-10(3) of the University and University Colleges Act), Kristiania will receive personal data relating to you from RUST. Only a small number of people at Kristiania will have access to such personal data. Please feel free to read the <u>RUST privacy policy</u>.

## Registrations that are made without your express consent

• Other people who register details about you in EVUweb

In some cases, your data may be registered in EVUweb by employers and others. This normally takes place if you will be studying/participating in further and/or continued education at Kristiania through your employer. Such information may be necessary for us to process an application/registration for admission to study programmes/courses.

• Other people who register details about you in Nomination

Nomination is a web application in which external institutions can nominate exchange students for Norwegian educational institutions. If you have been nominated via Nomination, you will already have been notified via e-mail. The following personal data is added to Nomination and is subsequently transferred to FS: first and last name, gender, e-mail address, date of birth, citizenship and what you have been nominated for. The person who submits the nomination may also upload documents together with the nomination. People who have been nominated can view their personal data and any documents via the application portal.

• Case managers at Kristiania

In some cases, case managers at Kristiania need to register your data in connection with your studies. Examples include justifications and complaints relating to marking and registrations linked to the completion of study programmes.

## • The common contact register (KORR)

In order to ensure that your name and address are correct, we obtain the contact details of active and former students at Kristiania (personal e-mail address and personal mobile number) from the common contact register (KORR).

• The Norwegian State Educational Loan Fund

The Norwegian State Educational Loan Fund sends a list of all its customers to Kristiania. This is done so that we know whose data to submit to the Norwegian State Educational Loan Fund in connection with the disbursement of loans. Please see section 8.3 below.

# • Digital examination systems

An increasing number of examinations are organised via digital examination systems. The assessments and explanations of the assessments that are registered in the examination systems by teachers and examiners, are submitted to FS.

# Fagpersonweb

In the same way as for digital examination systems, assessments and explanations of the assessments may also be registered about you in Fagpersonweb. Fagpersonweb is a web application that is used by teachers and examiners. In addition to assessments and explanations of the assessments, attendance registration may also be done via Fagpersonweb. The personal data relating to you that is registered in Fagpersonweb is sent to FS.

• User administration systems

In order to provide you with an IT account at Kristiania and access to our IT systems, your personal data will be registered in a user administration system such as Microsoft Dynamics 365 Business Central (BC)/Microsoft Active Directory. We will register your name and personal identification number (11 digits), as well as where you are studying (faculty/department).

## • Finance system

The payment of semester fees, course fees and other fees related to study programmes at Kristiania are processed using Microsoft Dynamics 365 Business Central (BC). This means that the following data relating to you will be sent from FS to the supplier: student number, name, customer group, all telephone numbers, all addresses, e-mail addresses and URL (web links) if you are registered with such details.

# 6) Automatic processing may take place in some cases

When you apply for admission to Kristiania, a number of processes in the processing of your application may be performed fully or semi-automatically. This applies in the following situations:

- assessing whether you qualify for admission
- point calculations for admissions
- allocating a study place
- calculating who may register for which modules (via Studentweb)
- registering for teaching and examinations and allocating spaces for teaching that has limited capacity
- verifying the education plan
- creating invoices
- when you complete a study programme: calculating the qualification achieved
- suspending the right to study due to inadequate progress
- calculating the overall grade for modules that include examination elements

## 7) How long do we retain your personal data for?

Generally, all your personal data is stored in the Common Student System (FS) forever. There are some exceptions:

Documents for applicants who do not get a study place are deleted when the admission process is completed.

Personal data relating to sanctions, cf. Sections 3-7(8), 4-8(1) to (3) or 4-10(3) of the University and University Colleges Act, is automatically deleted from FS six months after the expiration of the sanction.

If Kristiania receives information that you are dead, we will delete your contact data. Any applications for admission, registration for teaching, courses, and examinations, etc. will be withdrawn.

### 8) We disclose your personal data to others

Disclosure or export of data is defined as any disclosure of data other than to our own system/processing, to the data subject themselves or anyone who receives data on their behalf. Kristiania may disclose or export data that contains personal data to other systems, i.e., external data processors in cases where this is deemed necessary.

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

## 1. Student welfare organisations

If you have paid the semester fee for the current semester or been granted a right to study in the last two months, the Student Welfare Organisation can access personal data about you from Kristiania. This is so that they know that you are a student and that you are entitled to student discounts on the student welfare services. The Student Welfare Organisation can access your national identity number (11 digits), your name, when you last paid the semester fee and the ID of your student card. The legal basis is the GDPR Article 6, no. 1c (our legal obligations) with a supplementary legal basis in Sections 4 and 5 of the Student Welfare Organisation Act.

## 2. Norwegian Directorate of Immigration (UDI)

If you are not registered with a permanent residence permit in Norway, Kristiania will prepare a report about you regarding study progression and part-time work permits. You will receive the report in paper format from the college, and then you yourself give it to the Norwegian Directorate of Immigration (UDI). <u>Read more about UDI's regulations.</u>

## 3. The Norwegian State Educational Loan Fund (Lånekassa)

If you are a customer of the Norwegian State Educational Loan Fund, information relating to you will be submitted to the Norwegian State Educational Loan Fund as soon as you have been registered as a student. The following personal data is transferred to the Norwegian State Educational Loan Fund once per day: personal identification number/D number (11 digits) and the details of the university/university college you have been admitted as a student at.

If you have taken an examination and/or received prior approval of foreign education or studies abroad, information relating to you will also be submitted to the Norwegian State Educational Loan Fund. The following personal data is transferred to Lånekassen once per day: national identification number/D number (11 digits), the university/university college you took your examination at, the result of the examination (pass/fail/not marked, if passed: also, the grade).

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

The legal basis is the GDPR Article 6, no. 1c (our legal obligations) with a supplementary legal basis in Section 21 of the Student Financial Aid Act.

# 4. Nordic Institute for Studies in Innovation, Research and Education (NIFU).

In some cases, Kristiania will transfer personal data about you to NIFU for research purposes. This is personal data related to your education with us (bachelor's and master's degree). The data transfer goes via DBH.

# 5. The Norwegian Diploma Registry (Vitnemålsportalen)

The Diploma Registry retrieves the students' national identity number (11 digits, possibly D-number or S-number), connection to the college, and exams the student has taken and passed, directly from the college's databases. The Diploma Registry ensures that the results shared are correct. <u>Read more about the National Diploma Registry</u>.

# 6. RUST - the National Student Exclusion Register

Excluded students are registered in RUST – the National Student Exclusion Register. The data is transferred to RUST pursuant to cf. §3(7)(8), § (4)(8) (1-3), §4(10)(3) and §4(12) (1-3) of the Universities and University Colleges Act. When the sanction period has expired, personal data and data about the decision are automatically deleted from the register.

# 7. Unit – the Norwegian Directorate for ICT and Joint Services in Higher Education and Research - supplier and developer of FS

Employees at Unit who need it for their work, have access to your personal data in order to perform support and error corrections in FS.

## 8. UNINETT AS

It is possible to log in to the application portal and Studentweb with the login solution Feide, which is developed and delivered by UNINETT AS. Employees at UNINETT AS, who need it for their work, have access to your FEIDE name and IP address. This is in order to perform support and fix bugs in the service.

## 9. WiseFlow (digital examination system) and URKUND (plagiarism system)

In order for you to complete a digital exam, we send personal data about you to UNIwise, which develops and operates the Wiseflow system, and Ouriginal, which supplies URKUND. You can read more about these systems in Part 11.2 and 11.5 of the Privacy Notice.

# **10.** Time Edit (supplier of the timetable system) and Kong Arthur (integration of the timetable system).

The data that is transferred is: name, student number, mobile number, username, class, and study program.

## 11. Instructure (supplier of Canvas and Canvas integration services).

Read more about Canvas in Part 11.1 of the Privacy Notice.

# 12. Semester fee payments at Kristiania are processed in Microsoft Dynamics 365 Business Central.

This means that Oseberg Solutions AS (supplier of our finance system) has access to the data relating to you that is stored in FS.

## 13. Kristiania's access control system

Your details will be registered in Kristiania's access control system so that you can use your student card to access our premises and rooms during your studies. The photo used for active student cards is stored in FS and will be the same photo that is transferred to the mobile Student ID app for students that choose to use the app.

# 14. Other universities and university colleges

• Applying for admission

When you apply for admission to Kristiania, your application will in most cases be processed by Kristiania. If you have applied for admission to one or more other universities/university colleges, they may process your application on behalf of all universities/university colleges you have applied to. In such cases, they will process and store your personal data in connection with your application(s). Your application will contain personal data that you register yourself via the application portal.

• Consenting to the exchange of results

If you have achieved results from assessments and degrees from a university/university college and wish to use such results in connection with the application for admission at another Norwegian university/university college, you can consent to the exchange of results. As soon as the consent has been provided, our case managers may obtain all of your results from all Norwegian institutions that use FS. In practice, this means most universities and university colleges in Norway, except for the Norwegian Business School, BI. We will refer to the institution's privacy notice for further information about the processing of your personal data.

• Recognition of foreign education

If you have applied for recognition of foreign education, the case details relating to the application, including your personal data, may be transferred to GAUS - a search service for the recognition of foreign education. Other universities/university colleges in Norway have access to look up and view your personal data in GAUS. Please feel free to read the <u>GAUS privacy policy</u>.

• Sanction decisions in connection with conduct

In cases where it has been recorded that Kristiania has decided to sanction you, such sanction decisions will often be sent to RUST (the National Student Exclusion Register). Decisions regarding sanctions are linked to one or more of the following: use of a false degree certificate or diploma, disruptive/unacceptable conduct, dangerous conduct, gross breach of confidentiality, gross indecency during supervised professional training or clinical teaching, cheating, attempted cheating, complicity in cheating or exclusion following a suitability assessment. If, during the sanction period, you have applied for admission to another Norwegian university/university college, your personal details will be sent to this university/university college. A few select individuals at this institution will then have access to your personal data. In some cases, this will also apply if you are registered for examination. Please feel free to read the <u>RUST privacy policy</u>.

# **15.** NOKUT - Norwegian Agency for Quality Assurance in Education (recognition of foreign education).

If you have applied for recognition of foreign education, the case details relating to the application, including your personal data, may be transferred to GAUS - a search service for the recognition of foreign education. NOKUT has access to look up and view your personal data in GAUS.

## 16. Alma Library System

At Kristiania, the library system Alma is used, a service that <u>Unit</u> provides to the <u>Bibsys consortium</u>. In order for you to be registered as a borrower at the school, and use library services, we send personal information about you to Unit, department BIBSYS. This happens as soon as you are admitted as a student. Your personal information will be deleted from the library system if you have not registered for the semester before the deadline for this expires. <u>Here you will find more</u> <u>information about the processing of personal data in Alma</u>.

## 17. NSD Norwegian Centre for Research Data and the Database for Higher Education (DBH).

In some cases, Kristiania will transfer your personal data to NSD and DBH for research purposes and statistics. Such data will be personal data relating to

- your application for admission to study programmes
- your semester registration, paid semester fees and registration(s) for course(s)
- the examinations you have taken
- your qualification(s) achieved
- your exchange visit(s)
- whether you have achieved credits in accordance with your individual education plan
- you and your PhD programme

### **18. Statistics Norway**

In some cases, Kristiania transfers your personal data to Statistics Norway for statistical purposes. The data transfer goes via DBH. Such data will be personal data relating to

- your semester registration
- your examination result(s)
- your completed study program
- your achieved qualification(s) that will lead to a degree certificate or diploma
- you and your right to study in a PhD programme

## 19. Norwegian Institute for Studies in Innovation, Research and Education (NIFU).

In some cases, Kristiania will transfer personal data relating to you to NIFU for research purposes. This will be personal data relating to your master's degree (in some cases your bachelor's degree) and your PhD. The data transfer goes via DBH.

### 20. User administration systems

In order to provide you with an IT account at Kristiania and access to our IT systems, your personal data will be registered in a user administration system called Microsoft Dynamics 365 Business Central (BC)/Microsoft Active Directory. In this connection, we will transmit personal data such as address details, photo, group affiliations and information about registrations for teaching and examinations from FS to Microsoft Dynamics 365 Business Central (BC)/Microsoft Active Directory.

### 21. The Norwegian Directorate of Health

If you have completed a study programme that may lead to authorisation or license under the Norwegian Health Personnel Act, Kristiania will transfer your personal data to the Norwegian

Directorate of Health/the Health Personnel Register (HPR). Such data includes your name, personal identification number (11 digits), information about the study programme and the qualifications you have achieved. This means that you do not have to apply for authorisation when you complete such a study programme.

### 9) The security of your personal data

Kristiania regularly conducts risk and vulnerability analyses to keep your personal data secure in FS. Security measures, such as access controls, have also been implemented to ensure that only the necessary employees have access to your personal data. All actions are logged.

### 10) Your rights

### **Right to information and access**

You are entitled to information about how Kristiania processes your personal data. This privacy policy is intended to contain the information you are entitled to receive.

You also have the right to see/gain access to all personal data registered about you at Kristiania. You also have the right to obtain a copy of personal data about you if you wish.

#### **Right to correction**

You have the right to have incorrect personal data corrected. You also have the right to have incomplete personal data about you supplemented. If you believe that we have registered incorrect or inadequate personal data relating to you, please get in touch. It is important that you justify and possibly document why you think your personal data is incorrect or inadequate.

### **Right to restrict processing**

In certain cases, you may have the right to request that we restrict the processing of your personal data. Restricting the processing of personal data means that we will continue to store the personal data but that the possibilities for further processing are restricted.

If you believe that your personal data is incorrect or inadequate, or you have objected to processing (see further information about objecting below), you have the right to request that the processing of your personal data is temporarily restricted. This means that the processing will be restricted until we have corrected your personal data or until we have considered whether your objection is justified.

In other cases, you may also have the right to request more permanent restriction of the processing of your personal data. In order to have the right to request the restriction of the processing of your personal data, the terms set out in Article 18 of the GDPR must be met. If we receive a request from you to restrict the processing of your personal data, we will consider whether the terms of the act have been met.

#### **Right to erasure**

In some cases, you have the right to require us to erase personal data about you. The right to erasure is not an unconditional right and whether you are entitled to erasure must be considered in light of the applicable laws relating to data protection, i.e., the Data Protection Act and the GDPR. If you wish to request the erasure of your personal data, please contact us. It is important that you justify why you want your personal data erased and if possible, also state which personal data you wish to have erased. We will then consider whether the terms to request erasure under the act have been met. Note that in some cases the law allows us to make exceptions to the right to erasure. For example, this will be the case when we need to store the personal data in order to fulfil a task we

are required to perform by the Universities and University Colleges Act, or to safeguard important societal interests such as archiving, research and statistics.

### The right to object

You may have the right to object to the processing if you have a special need to stop the processing of your personal data. The right to object is not an unconditional right and depends on the legal basis for the processing and whether you have a special need. The terms can be found in Article 21 of the GDPR. If you object to processing, we will consider whether the conditions for objecting have been met. If we find that you have the right to object to the processing and that the objection is justified, we will stop the processing and you will also be able to demand deletion of the data. Note that in some cases, we may nevertheless make exceptions to deletion, for example if we need to store the personal data in order to fulfil a task, we are required to perform pursuant to the Universities and University Colleges Act, or to safeguard important public interests.

### Right to complain about the processing

If you believe that we have not processed your personal data in a correct and lawful manner, or if you believe that we have not been able to fulfil your rights, you have the option to complain about the processing. You can find details of how to contact us in Item 11.

If we do not comply with your complaint, you can lodge an appeal with the Norwegian Data Protection Authority. The Norwegian Data Protection Authority is responsible for ensuring that Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR when processing personal data.

### 11) Contact

### **Data Controller**

**Kristiania University College or Kristiania Professional College** is the data controller for personal data in the Common Student System, cf. GDPR, Article 4, no. 7. Who the data controller is depends on where you are studying.

If you want to exercise your rights as addressed in section 10 above, please contact <u>behandlingsansvarlig@kristiania.no</u>. We will process your request without undue delay and no later than within 30 days.

### **Data Protection Officer**

Kristiania has a Data Protection Officer who safeguards the privacy rights of students and employees at Kristiania. The Data Protection Officer for the administrative processing of personal data at Kristiania can be reached via e-mail at: <a href="mailto:personvernombud@kristiania.no">personal data</a> at Kristiania can be reached via e-mail at: <a href="mailto:personvernombud@kristiania.no">personvernombud@kristiania.no</a>