

## **EuNC General Data Protection and Privacy Policy**

We are very delighted that you have shown interest in European Nazarene College! Data protection is important to the administration of the European Nazarene College e.V..

The processing of personal data will be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to the European Nazarene College e.V.. By means of this data protection declaration, our enterprise would like to inform the general public of the nature, scope, and purpose of the personal data we collect, use and process. Furthermore, data subjects are informed, by means of this data protection declaration, of the rights to which they are entitled.

As the controller, the European Nazarene College e.V. has implemented numerous technical and organizational measures to ensure the most complete protection of personal data processed.

### **I. Name and Address of the controller**

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

European Nazarene College e.V.  
Represented by chairman Piet Boekhoud  
Lagerhausstrasse 7-9  
63589 Linsengericht  
Germany  
Phone: (49) 06051 5387 330  
Email: [office@eunc.edu](mailto:office@eunc.edu)  
Website: <https://www.eunc.edu>

### **II. Name and Address of the Data Protection Officer**

The Data Protection Officer of the controller is:

Mrs. Tanja Baum  
Data Protection Officer, Financial Assistant  
European Nazarene College e.V.  
Lagerhausstrasse 7-9  
63589 Linsengericht  
Germany  
Phone: (49) 06051 5387 330  
Email: [dpo@eunc.edu](mailto:dpo@eunc.edu)  
Website: <https://www.eunc.edu>

Any data subject may, at any time, contact our Data Protection Officer directly with all questions and suggestions concerning data protection.

### **III. Scope**

This general data protection and privacy policy is valid for European Nazarene College e.V., all EuNC Learning Centers in and outside the European Union and EuNC Processors in and outside the European Union. It serves as policy and information for the general public.

### **IV. Principles**

Our principles for data processing are the following:

- ***Proportionality, fairness and transparency***: We only process personal data that we need for the fulfillment of our educational and statutory mandate as well as for the fulfillment of legal obligations. We respect the rights of the persons whose data we process.
- ***Data minimization***: We take care not to collect more data than is actually needed.
- ***Storage limitation***: Data that we no longer need will be restricted or deleted.
- ***Accuracy***: We keep our data up to date.
- ***Purpose limitation***: We process personal data only as it is necessary for the performance of our duties and according to the purpose for which the personal data are intended.
- ***Lawfulness***: We use personal data only as permitted by the GDPR or by the person.
- ***Confidentiality***: We do not share personal data without permission through the GDPR, the person or our contractual agreements. We maintain confidentiality for any sensitive or private information that we receive.
- ***Integrity***: We ensure the security of all personal data given to EuNC.
- ***Accountability***: EuNC takes responsibility for adhering to our principles.

### **V. Definitions**

The data protection and privacy policy of the European Nazarene College e.V. is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). Our data protection and privacy policy should be legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

In this data protection declaration, we use, inter alia, the following terms:

#### ***a) Personal data***

Personal data means any information relating to an identified or identifiable natural person (“data subject”). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

#### ***b) Special Data***

“Special data” is a shorter term for “Special categories of personal data”. These special categories include racial and ethnic origin, political opinions, religious and philosophical beliefs, genetic data, biometric data, health data and data concerning a natural person's sex life or sexual orientation.

***c) Data subject***

Data subject is any identified or identifiable natural person, whose personal data is processed by the controller responsible for the processing.

***d) Processing***

Processing is any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

***e) Restriction of processing***

Restriction of processing is the marking of stored personal data with the aim of limiting their processing in the future.

***f) Profiling***

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

***g) Pseudonymisation***

Pseudonymisation is the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

***h) Filing system***

Any structured collection of personal information that is accessible by specific criteria is a file system. It can be an electronic system as well as a physical file system (e.g. file cabinet).

***i) Controller***

The controller is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; unless the purposes and means of such processing are determined by Union or Member State law.

***j) Processor***

A processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

***k) Recipient***

A recipient is a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

***l) Third party***

A third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

***m) Consent***

Consent of the data subject is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

***n) Enterprise***

For the purpose of this document, it refers to European Nazarene College e.V.. European Nazarene College is an international organization.

## **VI. Purpose of processing: Website and applications**

The use of the main website of European Nazarene College e.V. (<https://www.eunc.edu>) is possible without any indication of personal data; however, if a data subject wants to use special enterprise services, processing of personal data could become necessary. If the processing of personal data is necessary and there is no statutory basis for such processing, we generally obtain consent from the data subject.

However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed. For this reason, every data subject is free to transfer personal data to us via alternative means, e.g. by telephone.

### ***1. Cookies***

The various web-based systems of European Nazarene College e.V. use cookies. Cookies are text files that are stored in a computer system via an Internet browser.

Many Internet sites and servers use cookies. Many cookies contain a so-called cookie ID. A cookie ID is a unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.

Through the use of cookies, European Nazarene College e.V. can provide the users of our web-based services with more user-friendly services that would not be possible without the cookie setting.

By means of a cookie, the information and offers on our websites can be optimized with the user in mind. Cookies allow us, as previously mentioned, to recognize our website users. The purpose of this recognition is to make it easier for users to utilize our websites. The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system.

The data subject may, at any time, prevent the setting of cookies through our websites by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

## ***2. Collection of general data and information***

The various websites and web services of European Nazarene College e.V. collect a series of general data and information when a data subject or automated system calls up the website. This general data and information are stored in the server log files. Collected may be (1) the browser types and versions used, (2) the operating system used by the accessing system, (3) the website from which an accessing system reaches our website (so-called referrers), (4) the sub-websites, (5) the date and time of access to the Internet site, (6) an Internet protocol address (IP address), (7) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the European Nazarene College e.V. does not draw any conclusions about the data subject. Rather, this information is needed to (1) deliver the content of our website correctly, (2) optimize the content of our website as well as its advertisement, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack. Therefore, the European Nazarene College e.V. analyzes anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our enterprise, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

## ***3. Subscription to the EuNC newsletter***

On the main website of European Nazarene College e.V. (<https://www.eunc.edu>), users are given the opportunity to subscribe to our college's newsletter. This service is provided by Rocket Science Group LLC, 675 Ponce De Leon Ave NE, Suite 5000, Atlanta, GA 30308, USA.

MailChimp is a service which allows for organizations to create email lists that individuals can subscribe to or unsubscribe from in order to receive the information provided in that email distribution list. If you provide data (e.g. your name and email address) to subscribe to our newsletter, it will be stored on MailChimp servers in the US.

EuNC has a data processing agreement signed with MailChimp and they are certified under the EU-US Privacy Shield. The Privacy Shield is an agreement between the European Union (EU) and the US to ensure compliance with European privacy standards in the United States.

We use MailChimp to analyze our newsletter usage. When you open an email sent by MailChimp, a file included in the email (called a web beacon) connects to MailChimp's servers in the United States. This allows us to determine if a newsletter message has been opened and which links you click on. In addition, technical information is collected (e.g. time of retrieval, IP address, browser type, and operating system). This information cannot be assigned to a specific recipient. It is used exclusively for the statistical analysis of our newsletter. The results of these analyses can be used to better tailor future newsletters to your interests.

If you do not want your usage of the newsletter to be analyzed by MailChimp, you will have to unsubscribe from the newsletter. For this purpose, we provide a link in every newsletter we send. You can also unsubscribe from the newsletter directly on the website.

For the newsletter data processing is based on Art. 6 subs. 1 lit. a GDPR. You may revoke your consent at any time by unsubscribing to the newsletter. The data processed before we receive your request may still be legally processed.

The data provided when registering for the newsletter will be used to distribute the newsletter until you cancel your subscription when said data will be deleted from our servers and those of MailChimp. Data we have stored for other purposes (e.g. email addresses for the members area) remains unaffected.

For details, see the MailChimp privacy policy at <https://mailchimp.com/legal/terms/>.

#### **4. Contact possibility via the website**

The main website of European Nazarene College e.V. (<https://www.eunc.edu>) contains various contact forms or feedback forms that enables a quick electronic contact to our enterprise, as well as direct communication with us, which may include various personal information such as name and email address. If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Forms submitted on the website are sent via email to specific offices of European Nazarene College e.V. for further processing. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

#### **5. Data protection provisions about the application and use of Google Analytics (with anonymization function)**

On the main website of European Nazarene College e.V. (<https://www.eunc.edu>), the controller has integrated the component of Google Analytics (with the anonymizer function). Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. Web analytics are mainly used for the optimization of a website and in order to carry out a cost-benefit analysis of Internet advertising.

The operator of the Google Analytics component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

For the web analytics through Google Analytics the controller uses the application "\_gat.\_anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is

abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

The purpose of the Google Analytics component is to analyze the traffic on our website. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our website for us.

Google Analytics places a cookie on the information technology system of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by the controller and into which a Google Analytics component was integrated, the Internet browser on the information technology system of the data subject will automatically submit data through the Google Analytics component for the purpose of online advertising and the settlement of commissions to Google. During the course of this technical procedure, the enterprise Google gains knowledge of personal information, such as the IP address of the data subject, which serves Google, inter alia, to understand the origin of visitors and clicks, and subsequently create commission settlements.

The cookie is used to store personal information, such as the access time, the location from which the access was made, and the frequency of visits of our website by the data subject. With each visit to our Internet site, such personal data, including the IP address of the Internet access used by the data subject, will be transmitted to Google in the United States of America. These personal data are stored by Google in the United States of America. Google may pass these personal data collected through the technical procedure to third parties.

The data subject may, as stated above, prevent the setting of cookies through our website(s) at any time by means of a corresponding adjustment of the web browser used and thus permanently deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the information technology system of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of the website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link <https://tools.google.com/dlpage/gaoptout> and install it. This browser add-on tells Google Analytics through a JavaScript, that any data and information about the visits of Internet pages may not be transmitted to Google Analytics. The installation of the browser add-ons is considered an objection by Google. If the information technology system of the data subject is later deleted, formatted, or newly installed, then the data subject must reinstall the browser add-ons to disable Google Analytics. If the browser add-on was uninstalled by the data subject or any other person who is attributable to their sphere of competence, or is disabled, it is possible to execute the reinstallation or reactivation of the browser add-ons.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/> and under <http://www.google.com/analytics/terms/us.html>. Google Analytics is further explained under the following Link <https://www.google.com/analytics/>.

#### **6. Data protection provisions about the application and use of YouTube**

On the main website of European Nazarene College e.V. (<https://www.eunc.edu>), the controller has integrated components of YouTube. YouTube is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. YouTube allows you to publish all kinds of videos, so you can access both full movies and TV broadcasts, as well as music videos, trailers, and videos made by users via the Internet portal.

The operating company of YouTube is YouTube, LLC, 901 Cherry Ave., San Bruno, CA 94066, UNITED STATES. The YouTube, LLC is a subsidiary of Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a YouTube component (YouTube video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding YouTube component. Further information about YouTube may be obtained under <https://www.youtube.com/yt/about/en/>. During the course of this technical procedure, YouTube and Google gain knowledge of what specific sub-page of our website was visited by the data subject.

If the data subject is logged in on YouTube, YouTube recognizes with each call-up to a sub-page that contains a YouTube video, which specific sub-page of our Internet site was visited by the data subject. This information is collected by YouTube and Google and assigned to the respective YouTube account of the data subject.

YouTube and Google will receive information through the YouTube component that the data subject has visited our website, if the data subject at the time of the call to our website is logged in on YouTube; this occurs regardless of whether the person clicks on a YouTube video or not. If such a transmission of this information to YouTube and Google is not desirable for the data subject, the delivery may be prevented if the data subject logs off from their own YouTube account before a call-up to our website is made.

YouTube's data protection provisions, available at <https://www.google.com/intl/en/policies/privacy/>, provide information about the collection, processing and use of personal data by YouTube and Google.

#### **7. Data protection provisions about the application and use of Vimeo**

On the main website of European Nazarene College e.V. (<https://www.eunc.edu>), the controller has integrated components of Vimeo. Vimeo is an Internet video portal that enables video publishers to set video clips and other users free of charge, which also provides free viewing, review and commenting on them. Vimeo allows you to publish all kinds of videos, so you can access both full movies, music videos, trailers, and videos made by users via the Internet portal.

The operating company of Vimeo is Vimeo, Inc., 555 West 19th Street, New York, New York 10011, UNITED STATES.

With each call-up to one of the individual pages of this Internet site, which is operated by the controller and on which a Vimeo component (Vimeo video) was integrated, the Internet browser on the information technology system of the data subject is automatically prompted to download a display of the corresponding Vimeo component. Further information about Vimeo may be obtained under <https://vimeo.com/about>. During the course of this technical procedure, Vimeo gains knowledge of what specific sub-page of our website was visited by the data subject.

Vimeo's data protection provisions, available at <https://vimeo.com/privacy>, provide information about the collection, processing and use of personal data by Vimeo.

### ***8. Data protection provisions about the application and use of Facebook***

On the main website of European Nazarene College e.V. (<https://www.eunc.edu>), the controller has integrated components of the enterprise Facebook. Facebook is a social network.

A social network is a place for social meetings on the Internet, an online community, which usually allows users to communicate with each other and interact in a virtual space. A social network may serve as a platform for the exchange of opinions and experiences, or enable the Internet community to provide personal or business-related information. Facebook allows social network users to include the creation of private profiles, upload photos, and network through friend requests.

The operating company of Facebook is Facebook, Inc., 1 Hacker Way, Menlo Park, CA 94025, United States. If a person lives outside of the United States or Canada, the controller is the Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland.

With each call-up to one of the individual pages of this Internet website, which is operated by the controller and into which a Facebook component (Facebook plug-ins) was integrated, the web browser on the information technology system of the data subject is automatically prompted to download display of the corresponding Facebook component from Facebook through the Facebook component. An overview of all the Facebook Plug-ins may be accessed under <https://developers.facebook.com/docs/plugins/>. During the course of this technical procedure, Facebook is made aware of what specific sub-site of our website was visited by the data subject.

If the data subject is logged in at the same time on Facebook, Facebook detects with every call-up to our website by the data subject—and for the entire duration of their stay on our Internet site—which specific sub-site of our Internet page was visited by the data subject. This information is collected through the Facebook component and associated with the respective Facebook account of the data subject. If the data subject clicks on one of the Facebook buttons integrated into our website, e.g. the "Like" button, or if the data subject submits a comment, then Facebook matches this information with the personal Facebook user account of the data subject and stores the personal data.

Facebook always receives, through the Facebook component, information about a visit to our website by the data subject, whenever the data subject is logged in at the same time on Facebook during the time of the call-up to our website. This occurs regardless of whether the data subject clicks on the Facebook component or not. If such a transmission of information to Facebook is not desirable

for the data subject, then he or she may prevent this by logging off from their Facebook account before a call-up to our website is made.

The data protection guideline published by Facebook, which is available at <https://facebook.com/about/privacy/>, provides information about the collection, processing and use of personal data by Facebook. In addition, it is explained there what setting options Facebook offers to protect the privacy of the data subject. In addition, different configuration options are made available to allow the elimination of data transmission to Facebook. These applications may be used by the data subject to eliminate a data transmission to Facebook.

### ***9. Data protection provisions about the application and use of the Google Maps API***

The main website of European Nazarene College e.V. (<https://www.eunc.edu>), uses Google Maps APIs. Google Maps allows the finding of locations within the world by address along with an ability to create custom clickable maps to be used on a website that include tags to relevant information for an organization. This use, allows EuNC to have the map of our locations provided to you in a clickable way.

The operator of the Google Maps API component is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, United States.

You may find the Google Maps APIs Terms of Service at <https://developers.google.com/maps/terms>. Google's Privacy policy can be found at <https://policies.google.com/privacy>.

By using our Maps API Implementation, you agree to be bound by Google's Terms of Service. By using our implementation of the Google Maps APIs, you agree to allow us to gain access to information about you including personally identifiable information (such as usernames) and non-personally identifiable information (such as location). We will be collecting the following information:

The Maps APIs that we use store and access cookies and other information on your devices.

### ***10. Third-Party Websites***

EuNC's websites may have links to other sites that are not covered by this privacy policy and are not under the control of European Nazarene College e.V. We suggest you look at the privacy policy of these individual sites, in particular, before providing any personal information to them.

## **VII. Purpose of processing: Finances and accounting**

### ***1. Accounting***

Names and bank details are recorded in our bookkeeping files. EuNC as an entity is registered in Germany. The German law states that accounting documents must be kept for 10 years.

### ***2. Donations***

For donations we process the following personal data: Name, address, bank details. Since handling donations is a part of accounting, the storage period for accounting documents applies.

### ***3. Payments: Banking institutions***

European Nazarene College works with different banking institutions. All the banking institutions underlie banking secrecy.

#### **4. Payments: PayPal**

On the EuNC main website, the controller has integrated components of PayPal. PayPal is an online payment service provider. Payments are processed via so-called PayPal accounts, which represent virtual private or business accounts. PayPal is also able to process virtual payments through credit cards when a user does not have a PayPal account. A PayPal account is managed via an e-mail address, which is why there are no classic account numbers. PayPal makes it possible to trigger online payments to third parties or to receive payments. PayPal also accepts trustee functions and offers buyer protection services.

The European operating company of PayPal is PayPal (Europe) S.à.r.l. & Cie. S.C.A., 22-24 Boulevard Royal, 2449 Luxembourg, Luxembourg.

If the data subject chooses "PayPal" as the payment option for paying for transcripts, course or other fees, or submitting donations, we automatically transmit the data of the data subject to PayPal that is provided. By selecting this payment option, the data subject agrees to the transfer of personal data required for payment processing.

The personal data transmitted to PayPal by our site is generally the amount, a description of the transaction, and for transcripts the name of the individual that needs the transcript. This is then passed on to PayPal where the additional personal information is provided for payment.

The transmission of the data is aimed at payment processing and fraud prevention. The controller will transfer personal data to PayPal, in particular, if a legitimate interest in the transmission is given. The personal data exchanged between PayPal and the controller for the processing of the data will be transmitted by PayPal to economic credit agencies. This transmission is intended for identity and creditworthiness checks.

PayPal will, if necessary, pass on personal data to affiliates and service providers or subcontractors to the extent that this is necessary to fulfill contractual obligations or for data to be processed in the order.

The data subject has the possibility to revoke consent for the handling of personal data at any time from PayPal. A revocation shall not have any effect on personal data which must be processed, used or transmitted in accordance with (contractual) payment processing.

The applicable data protection provisions of PayPal may be retrieved under <https://www.paypal.com/us/webapps/mpp/ua/privacy-full>.

### **VIII. Purpose of processing: Applicants, students and alumni**

By completing the application form, students enter into a contract with EuNC. The agreement includes theological education in various programs as well as several offers beyond the training. From applicants, students, and alumni European Nazarene College collects the following data:

Address, Admissions Recommendation/Denial Document, Application Form, Birth country, Mobile Phone number, Children, Christian background information, Church membership, Correspondence with administration, Country of citizenship, Course information (including grades, submitted work and online tests), Courses taken, Date of birth, Denomination, Education, Email address, Emergency contact information, Family Name, Financial information (Tuition, payments, debts with EuNC), First

Name, Gender, General notes, GPA for programs, Grades, Graduation information, Home Phone, Preferred Language, Leave status, Lists of completed courses, Library circulation information, Login data, Maiden name, Marital Status, Mentoring notes, Middle Name, Nickname, Original Language name, Pastor/DS reference, Personal reference, Photo, Preferred language, Preferred name, Profile (by student), Programs taken, Relationships, Sonis password, Sonis username, Student Biographic Profile, Student Relationships, Training, Transcripts (EuNC), Transcripts/Diplomas (previous schools). We use this personal data to fulfill our educational mandate.

In detail the data is used for processing the student's application, creating records, creating transcripts, course registration, mentoring, library circulation, reports, billing, cooperation with offices in the Church of the Nazarene, accreditation, class forums, course administration, and communication. The data is stored in the applicant's, student's and alumni's record.

For further processing, data is transferred internally to learning centers, staff and teachers. Since European Nazarene College e.V. is an international organization, these are located inside and outside the European Union, in so-called third countries.

For our classes and course administration we use two main systems: Moodle and Sonis. For library administration we use Koha. For archiving, electronic filing and collaboration we use Google Drive, HTTP Commander, and NextCloud. The data is not transferred to the provider but stored on our servers. For electronic book lending, we use the service OverDrive.com.

It is part of our mandate to be able at anytime to create transcripts and give information about taken courses and programs. For this reason student and alumni data is not deleted. It will be restricted after the student finished his studies.

## **IX. Legal basis for the processing**

The processing of data by European Nazarene College e.V. is based on several legal foundations. The legal bases on which data are processed on a regular basis as well as some legal foundations that apply in special cases are listed below:

**Contract performance:** Article 6 subs. 1 lit. b) GDPR gives contract performance as a legal basis for processing of data. When students apply for a programme at EuNC they also enter into a contract with EuNC. Most of our processing activities serve to fulfill our educational mandate and to fulfill the contracts with our students.

**Consent:** Natural persons can give consent for processing personal data according to article 6 subs. 1 lit. a and special categories of personal data according to article 9 subs. 2 lit. a. In case of minors, consent must be given by the parents. The consent is always purpose-limited. For processing activities that are not covered by Article 6 subs. 1 lit. b) GDPR (contract performance) we ask for consent.

**Legal obligation:** There may be legal obligations that the controller has to fulfill by legal obligations. In this case lawfulness is based on Article 6 subs. 1 lit. c) GDPR. This also applies to special categories of personal data, when we deal with obligations and rights regarding employment and social security according to Art. 9 subs. 2 lit. b) GDPR.

**Legitimate interests of the controller or processor:** There is a possibility that the controller has a legitimate interest in processing data. Lawfulness is based on Article 6 subs. 1 lit. f) GDPR.

**Vital interest:** In a case of emergency we are ready to process personal data and special data according to Art. 6 subs. 1 lit. d) and Art. 9 subs. 2 lit. d) GDPR.

**Publication by the data subject:** Art. 9 is understood as a permission to process data that a person manifestly made public.

**Public interest:** In rare cases, public interest may serve as a basis for data processing according to Art. 6 subs. 1 lit. e GDPR.

## **X. The legitimate interests pursued by the controller or by a third party**

Where the processing of personal data is based on Article 6 subs. 1 lit. f GDPR our legitimate interest is to carry out our business in favor of the well-being of all our employees and our denomination.

## **XI. Recipients**

All recipients of personal data collected by European Nazarene College are either employed by EuNC or are in other contractual relationship with EuNC. Through this contractual relationship they become processors of personal data for EuNC in the sense of Article 28 GDPR.

## **XII. Third country transfers**

As an international organization European Nazarene College transfers personal data to third countries. Most of our data is stored on data servers in Germany and can be viewed and retrieved. Some is actually transferred. The persons and organizations we transfer data to are processors to European Nazarene College e.V. by signing a data processing contract according to Art. 28 subs. 3 GDPR or EU standard data protection clauses according to Art. 46 subs. 2 lit. c and d GDPR. The legal basis for the transfer of personal data and special data is contract performance according to Art. 49 subs. 1 lit. b GDPR.

## **XIII. Storage**

The criteria used to determine the period of storage of personal data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

## **XIV. Rights of the data subject**

### **a) Right of access**

Each data subject shall have the right granted by the European legislator to obtain from the controller the confirmation as to whether or not personal data concerning him or her are being processed.

Each data subject shall have the right granted by the European legislator to obtain from the controller free information about his or her personal data stored at any time and a copy of this information. The information has to be given in the scope described in Art. 15 GDPR.

If a data subject wishes to avail himself of this right of access, he or she may, at any time, contact the controller or the data protection officer.

#### **b) Right to rectification**

Each data subject shall have the right granted by the European legislator to obtain from the controller without undue delay the rectification of inaccurate personal data concerning him or her. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

If a data subject wishes to exercise this right to rectification, he or she may, at any time, contact the controller or the data protection officer.

#### **c) Right to erasure (Right to be forgotten)**

Each data subject shall have the right granted by the European legislator to obtain from the controller the erasure of personal data concerning him or her without undue delay, and the controller shall have the obligation to erase personal data without undue delay where one of the following grounds listed in Art. 17 GDPR applies.

If one of the reasons listed in Art. 17 GDPR applies, and a data subject wishes to request the erasure of personal data stored by the European Nazarene College e.V., he or she may, at any time, contact the controller or the data protection officer. European Nazarene College e.V. ensures that the erasure request is complied with immediately.

Where the controller has made personal data public and is obliged pursuant to Article 17 subs. 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested erasure by such controllers of any links to, or copy or replication of, those personal data, as far as processing is not required. An employees of the European Nazarene College e.V. will arrange the necessary measures in individual cases.

#### **d) Right of restriction of processing**

Each data subject shall have the right granted by the European legislator to obtain from the controller restriction of processing where one reasons listed in Article 18 GDPR applies.

If one of the aforementioned conditions is met, and a data subject wishes to request the restriction of the processing of personal data stored by the European Nazarene College e.V., he or she may at any time contact the controller or the data protection officer. European Nazarene College e.V. will arrange the restriction of the processing.

#### **e) Right to data portability**

Each data subject shall have the right granted by the European legislator, to receive the personal data concerning him or her, which was provided to a controller, in a structured, commonly used and machine-readable format. He or she shall have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided, as long as the

processing is based on consent pursuant to point (a) of Article 6 subs. 1 of the GDPR or point (a) of Article 9 subs. 2 of the GDPR, or on a contract pursuant to point (b) of Article 6 subs. 1 of the GDPR, and the processing is carried out by automated means, as long as the processing is not necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Furthermore, in exercising his or her right to data portability pursuant to Article 20 subs. 1 of the GDPR, the data subject shall have the right to have personal data transmitted directly from one controller to another, where technically feasible and when doing so does not adversely affect the rights and freedoms of others.

In order to assert the right to data portability, the data subject may at any time contact the controller or the data protection officer of European Nazarene College e.V..

#### **f) Right to object**

Each data subject shall have the right granted by the European legislator to object, on grounds relating to his or her particular situation, at any time, to processing of personal data concerning him or her, which is based on point (e) or (f) of Article 6 subs. 1 of the GDPR. This also applies to profiling based on these provisions.

The European Nazarene College e.V. shall no longer process the personal data in the event of the objection, unless we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defense of legal claims.

If the European Nazarene College e.V. processes personal data for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing. This applies to profiling to the extent that it is related to such direct marketing. If the data subject objects to the European Nazarene College e.V. to the processing for direct marketing purposes, the European Nazarene College e.V. will no longer process the personal data for these purposes.

In addition, the data subject has the right, on grounds relating to his or her particular situation, to object to processing of personal data concerning him or her by the European Nazarene College e.V. for scientific or historical research purposes, or for statistical purposes pursuant to Article 89(1) of the GDPR, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

In order to exercise the right to object, the data subject may contact any employee of the European Nazarene College e.V.. In addition, the data subject is free in the context of the use of information society services, and notwithstanding Directive 2002/58/EC, to use his or her right to object by automated means using technical specifications.

#### **g) Right to withdraw data protection consent**

According to Article 7 GDPR each data subject shall have the right granted by the European legislator to withdraw his or her consent to processing of his or her personal data at any time.

If the data subject wishes to exercise the right to withdraw the consent, he or she may, at any time, contact the controller or the data protection officer of European Nazarene College e.V..

## **XV. Provision of personal data as statutory or contractual requirement; Requirement necessary to enter into a contract; Obligation of the data subject to provide the personal data; possible consequences of failure to provide such data**

We clarify that the provision of personal data is partly required by law (e.g. tax regulations) or can also result from contractual provisions (e.g. information on the contractual partner). Sometimes it may be necessary to conclude a contract that the data subject provides us with personal data, which must subsequently be processed by us. The data subject is, for example, obliged to provide us with personal data when our company signs a contract with him or her. The non-provision of the personal data would have the consequence that the contract with the data subject could not be concluded. Before personal data is provided by the data subject, the data subject must contact any employee. The employee clarifies to the data subject whether the provision of the personal data is required by law or contract or is necessary for the conclusion of the contract, whether there is an obligation to provide the personal data and the consequences of non-provision of the personal data.

## **XVI. Source of data**

We only use personal data that is given to us by a data subject.

## **XVII. Existence of automated decision-making**

As a responsible company, we do not use automatic decision-making or profiling.

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This Privacy Policy has been generated by the Privacy Policy Generator of the [German Association for Data Protection](#) that was developed in cooperation with [Privacy Lawyers](#) from WILDE BEUGER SOLMECKE, Cologne. It has been modified to handle the different technologies and services used by European Nazarene College e.V.