

Description

Dataprocessing

Electrotechnical Study Association Scintilla

Processing member administration

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Introduction

This document describes how one should handle the personal details that are used and recorded within the member register of Elektrotechnische Studievereniging Scintilla.

Dataprocessing Description

Process Description

When a new member wishes to join Elektrotechnische Studievereniging Scintilla, based in Enschede and connected to the University of Twente, data is collected for provision of services to the member. This document describes which data is collected and what it is used for, as well as how concerned parties can access, modify or remove this data.

Goal

Scintilla collects data from its members for the purpose of achieving the goals as defined in the Articles of Association as drawn up on February 13th 2015. These goals are:

- a. to expand the practical and theoretical knowledge of its members about electrotechnical science;
- b. to promote the study related interests and issues of the electrotechnical students at the University of Twente;
- c. to further the correct course of education in the electrotechnical field;
- d. to solidify the mutual bonds between members.

The main goal of data processing is the maintenance of a legal membership administration. Specific cases of data processing that are deemed necessary to achieve the goals above are:

- a. Administration necessary to execute agreements made with the member;
- b. Administration of information about and participation in activities of Scintilla;
- c. Administration on behalf of the internal organisation structure of Scintilla;
- d. Administration on behalf of the exploitation of STORES;
- e. Administration for long term commitment; and
- f. Archiving of activities on behalf of the preservation of (historical) knowledge within the association.

Fundamentals

The member registration is legally based on Article 6 of the GDPR. Specifically for the membership administration as described in the previous paragraph, a legality based on permission applies; article 6.1.a. Furthermore, the data that is collected in administration (e) are legal based on permission. A clarification regarding the specific legality will be presented in the next paragraph.

For the mentioned administrations (a), (b) and (c) as described in the previous paragraph, it applies that the processing is legally based on Article 6.1.b of the GDPR. For administration (d), as described in the previous paragraph, legality applies based on Article 6.1.c. The archiving (f) as mentioned in the previous paragraph is based on Article 6.1.f. Clarification based on these

fundamentals is presented in the paragraphs “Clarification Fundamentals 6.1.b”, “Clarification Fundamentals 6.1.c” and “Clarification Fundamentals 6.1.f”.

Clarification Fundamentals 6.1.a – On the basis of permission

Permission is gathered for the collecting of data on behalf of membership administration. People who wish to become member of the association are requested to provide data during registration. When becoming a member, providing basic data is compulsory, as stated in the paragraph ‘Use of Personal Data’. Furthermore, people are given the option to supply other data voluntarily. The person has to agree with the By-laws and Articles of Association of E.T.S.V. Scintilla. To confirm, the member has to check a checkbox before confirming their membership.

In a few cases the membership is terminated, as described in Article 9 of the Articles of Association. Concerning the continuation of member data storage, no distinction is made regarding the manner of membership termination. In the case of membership termination, the collection of new data from the member in question is stopped.

Information about the time limit for storing previously collected data can be found in the paragraph “Storage Time Limit”.

Further information is collected by the association on behalf of long term involvement. This refers to being put into a variety of mailing lists for the purpose of long term involvement. Members give their explicit permission by adding themselves to this mailing list.

Permission for the preservation of the e-mail address and name can be revoked by de-enrollment from the mailing lists.

Clarification Fundamentals 6.1.b – On the basis of the necessity to execute agreements

To execute agreements with the member, the association generates and collects personal data. To send company e-mails, activity e-mails and/or education e-mails, the association stores the preferences of their members of receiving those e-mails.

Members that partake in activities or make use of Scintilla’s purchasing system, are in agreement that the associated costs will be settled on a later date. For this, the member’s bank account number, BIC and preference for preauthorized debit are collected. In addition, the association stores the history of contribution payments and the history of payments via the purchasing system. The purpose for this is to maintain the balance of a member’s debts to the association. A member can also log in to the purchasing system with an RFID-chip after the chip has been registered by the member. This data is collected for authentication purposes. The registration for activities is also stored by the association (including possible optional field), so that the treasurer can make a balance of the costs and distribute discounts for people who helped with the activity (barkeeper, ERO, etc.).

According to Article 17.2 of the Articles of Association, the association is obligated to make minutes during general meetings. The name of the present members will be written down. Furthermore, an audio recording will be made during the meeting to make it possible for the secretary to complete their minutes.

Active members can make use of the printer at Scintilla. The title of each document and the amount of pages is collected to monitor how many pages each member has printed.

In addition, data about which active members are part of which committees is collected. This is done so that other members can approach those committee members if they have any questions. The history of committee memberships of active members will likewise be stored to allow current committee members to ask questions to ex-committee members.

Clarification Fundamentals 6.1.c – On the basis of legal requirements for the keeper of data

The association is legally required to draft accurate invoices on which contact information of the customer is listed. These invoices should be stored for 7 years. This means that possibly provided contact information on invoices is stored by the association for 7 years.

Clarification Fundamentals 6.1.f – On the basis of looking after justified interests

Scintilla takes pictures during activities as a way to capture their atmosphere. These are meant to give a general impression of the atmosphere in publications, in information services and/or journalistic expressions of Scintilla. These pictures are not bound to one person and are available for review by the members of Scintilla.

The spaces of the STORES and Scintilla are equipped with security camera's. These camera's only record the interior of these spaces. The camera's purpose is to protect the interior and possessions of both the STORES and Scintilla.

Use of personal data

To achieve the earlier mentioned goals, data is (whether voluntary or not) collected, stored and processed, according to the table below:

Purpose of Data Processing	Data collected to achieve this purpose
Membership administration	<ul style="list-style-type: none"> • Student number (to verify studentship status) • Title (Salutation) • Titel (Degree) • First names • Nickname • Initials • Family name preposition • Last name • Date of birth • E-mail address • Phone number (to contact members) • Primary field of study (to determine membership's fee) • Postal address (to send association's magazine) • UT-address (to send association's magazine) • Vir Prudens (yes/no) • Type of membership (to determine membership's fee)

	<ul style="list-style-type: none"> • Starting year of study (to provide tailored information based on year of study) • Membership number • Permission to publish photos for the purpose of atmosphere impressions (yes/no)
The execution of agreements with the member	<ul style="list-style-type: none"> • Preferences regarding receiving messages via e-mail or text message • Mobile phone number (for the previously mentioned text message service) • Bank authorisation preferences in regards to <ul style="list-style-type: none"> ○ Membership Contribution ○ Activities and purchasing system • Bank account number (IBAN) • BIC • RFID-tags of cards registered by the member • Payment history of membership contributions • Printing history • Payment history of purchasing system • IP-address • Auditing logs
Administration of information about and participation in activities of Scintilla	<ul style="list-style-type: none"> • Enrollment lists of activities, including payment authorisation and possible fields filled in by the member during enrollment in the activity. • Data submitted in the enrollment lists that is stored after a member de-enrolls in the activity.
Administration for the internal organisational structure of Scintilla.	<ul style="list-style-type: none"> • Accounts of active members • Committee memberships • Committee history of active members, including function and start and end date.
Administration for the purpose of exploitation of STORES	<ul style="list-style-type: none"> • Contact information printed on invoices
Administration for long term involvement	<ul style="list-style-type: none"> • Name • E-mail address • Mailing list memberships
Archiving of activities for the purpose of the maintenance of (historical) knowledge within the association	<ul style="list-style-type: none"> • Photos for atmospherical impressions

Involved data

Data from an external source

In appendix A, the data stored by Scintilla is subdivided in different categories. The table below describes the relation of data to the source and the method of acquisition of this data.

Personal Data	Source	Method of Acquisition
Category 1	The member in question	Compulsory to be provided by the member during start of membership. Can subsequently be modified on the association's website.
Category 2	The member in question	One of the following: <ul style="list-style-type: none"> Optional personal data submitted at the start of the membership. Can (mostly) subsequently be modified on the association's website. Non-binding use of association facilities, such as the purchasing system or the websites. Non-binding participation in association activities.
Category 3	Within the association	Data that can be assigned to members by the board of the association.
Category 4	Within the association	Data that is automatically generated and assigned to members.

Data provided by the member will not be changed by the association.

Member registration data

Scintilla does not change data gained from external sources. An overview of all external sources can be found in the previous paragraph.

Special Personal Data

Scintilla does not collect data from which race or ethnic origin, political views, religious or ideological convictions, or membership of trade unions can be gleaned.

In addition, the association does not process any genetical data, biometrical data regarding the unique identification of a person, data about health, or data regarding sexual behaviour or sexual orientation.

Provision of data

Some personal data that is kept by Scintilla can be provided internally or externally. The provision of data only occurs when it is deemed imperative to the achievement of statutory goals of the association.

Internal

The personal data below can be made available by the association to its members:

- *Minutes of Scintilla's general meetings*
After the minutes of the general meetings of Scintilla have been processed, written versions are distributed to the members of Scintilla. The minutes contain the presence of members during the relating general meeting, as well as the statements made during the general meeting.
- *Enrollment lists for activities of Scintilla*
After logging into the association's website, members have access to the enrollment lists of activities, including payment authorization and possible other fields filled in by other members for the enrollment to the activity.
- *Data of participants of Scintilla activities for the organizing committee*
To benefit the course and execution of Scintilla activities, all active committee members that play an organisational role during the concerning activity have access to the phone number and e-mail address of participating members; as well as the data mentioned in the previous point.
- *Data in accounting program*
To allow the treasurers of committees of Scintilla to do accurate accountancy, they are allowed access to the data available in the accounting program. This includes:
 - First and last name;
 - Membership number.
- *Information about current active members of the association*
Data about active members is available to other active members after logging in on the website. This includes:
 - First and last name;
 - E-mail address;
 - Username of the active member's active member account;
 - Phone number(s);
 - Postal Address.

External

The data below is published in public places by the association:

- *Date of birth (day and month) in combination with first and last name*
The website-element 'Scintilla congratulates' publishes an overview of birthdays in the near future (of at most 7 days) in combination with a first and last name on the association's website.
- *Committee membership of a current active member*
The active member overview on the association's website publishes the current committee memberships and associated functions in combination with a first and last name. With the exception of the association's board membership history, this information is removed from the website at the end of a committee membership.
- *Atmosphere impression photos of Scintilla activities*
For Scintilla's provision of information and journalistic purposes, photos are published to give a general atmosphere impression for Scintilla's activities. Permission for the publication of atmosphere impression images is given at the start of a membership (and can be changed via SOCS). Written permission can be given for individual photo's. For

pictures used for Scintilla's journalistic purposes, permission is not retractable. To retract permission, a written statement should be handed in containing information regarding for which specific images permission is retracted.

Scintilla does not store photos for the purpose of identifying individuals (details in paragraph "data protection effect assessment"). Consequently, it is possible that a picture is published without permission. In a case of unwanted publication, a written statement can be made so that the correct steps can be taken to remove the publication in question.

- *(Nick)name of barkeepers and their attendance to activities*

To coordinate the use of spaces at the University of Twente, the name and nickname of the barkeepers that will be attending in the name of Scintilla will be provided on the online management portal Alexia. The Alexia system is not managed by Scintilla and publically available.

The data below is deliberately provided to external parties by the association:

- *Transfer to university departments*

To acquire subsidies from the University of Twente, the student numbers and names of the members are provided to the relevant departments within the University of Twente.

- *Executing/submitting direct debit*

From members who have given permission, debts to Scintilla are collected by sending a last name, collection identification, IBAN, BIC and a date of signature to the Rabobank, to which Scintilla is associated.

- *Transfer of data regarding access pass for UT-buildings*

To request an access pass, an e-mail address, name, student number and initials are sent to the University of Twente.

- *Transfer of names of participants in the Batavierenrace*

For the purpose of verification of the studentship of the participating party to the Batavierenrace, the names of five participants will be provided to the organisation of the Batavierenrace. The names of the remaining members are provided to be able to interpret the results.

- *Transfer of address to send the associative magazine 'de Vonk'*

The printing, packaging and sending of associative magazine 'de Vonk' has been outsourced by Scintilla to Gildeprint. To allow this party to present the printed magazines to the postal service, a list of address is provided.

- *Transfer of lists of names to companies for the purpose of career-orientation activities*

When a member enrolls in an activity at a company for career orientation, in some cases, their name will be provided to the company.

- *Transfer of data known at Scintilla to Congressus for the purpose of the member administration*

Congressus takes care of the member administration for Scintilla. Therefore data of members will be shared with Congressus, causing regular exchange of data between Scintilla and Congressus. With Congressus there is an agreement which describes what data is saved where.

Outside EU/ EEA

The association does not provide data to parties outside the EEA.

Organisation of processing

Security measures

The personal data is stored on servers of CloudVPS commissioned by Congressus. Congressus' security measures are described in the Verwerkersovereenkomst Congressus which the board has agreed upon with Congressus. Only board members and members of DIGI have a manager account with Congressus and can thus access this data.

Next to the member administration on Congressus Scintilla has a few more systems which need personal data. This includes two MySQL-servers and a PostgreSQL-server whose purpose was to store the member administration, and will now be used as a back-up. The other two servers are LDAP-servers which serve to authenticate active members and contain the full name, e-mail address and committee membership(s) of these members. Digital access to these databases is limited to members of the board and DIGI and is only possible from predetermined IP addresses. Physical access to the servers is limited to members of DIGI and those who were granted access by the UT.

The data from the Congressus-database can be accessed and changed by the member themselves, this excludes the membership status, payment history, committee memberships, Vir Prudent status and the comments field.

Additionally, (personal) data is cached in the database of Scintilla's website. This includes the following data:

- Membership number;
- First and last name;
- Student number;
- Login name of active members;
- Type of membership.

Active members at Scintilla can make use of the RDSH-server environment to connect from an external location to the systems of Scintilla. To allow for the correct operation of the RDSH-server environment of Scintilla, the following (personal) data is stored on this system:

- First and last name;
- Committee membership(s).

Next to this data, logs are kept to warrant the correct operation of the digital systems. These logs contain the following (personal) data:

Log	Personal data
-----	---------------

Website	IP-address and visited URL.
All systems where it is possible to login	Login attempts including username, timestamp and where applicable an IP-address.
Auditing	Suspicious actions including username, timestamp and nature of the action. Suspicious actions include: executing programs in prohibited locations.

Data protection impact assessment

The board of the association has considered not to perform a data protection impact assessment. The following arguments contributed to this assessment:

- There is no systematic or comprehensive assessment of personal aspects of natural persons with legal consequences for the natural person.
- There is no large-scale processing of special categories of personal data as described in the "Special Personal Data" section.
- There is no systematic and large-scale monitoring of publicly accessible spaces.
- There are only logical links to databases of external parties. An example of this is the link with the student database of the university for verifying the student status of members.

Rights of the involved

Articles 15 until 22 of the GDPR describe the rights of the involved. The next paragraphs describe how the association provides for each of these articles.

Right of access

A data subject can gain access to information known to Scintilla by submitting a written request to the board of the association. A limited amount of data can be viewed by the member without the intervention of the board by logging in to SOCS.

The processing purposes of personal data as laid down in this document can be requested from the board by submitting a written request to the board to view the description of data processing.

Personal data is not shared with third countries or international organizations; notification of such data provision is therefore not necessary.

Right to rectification

If a data subject cannot directly change his or her own data, a request for rectification of incorrect data can be submitted in writing to the board of the association.

Right to erasure

If a data subject wants to have his or her data deleted, a request can be submitted in writing to the board of the association.

Right to restriction of processing

If a data subject wishes to restrict the processing of their data on the basis of one of the following cases, a written request can be submitted to the board of the association.

- a. The accuracy of the data is disputed by the data subject for a period that allows the controller to check the accuracy of the personal data;
- b. the processing is unlawful and the data subject opposes the deletion of the personal data and instead requests a restriction of its use;
- c. the controller no longer needs the personal data for the purposes of processing, but the data subject needs it for the establishment, exercise or support of a legal claim;
- d. the data subject has objected to the processing in accordance with Article 21, section 1, pending the answer to the question if the justified grounds of the controller outweigh those of the data subject.

Notification obligation

If rectification, erasure or restriction of processing has been applied, the data subject will be informed of this in writing by the board of the association.

Right to data portability

The data subject can request a digital extract of their data in writing from the board of the association. This extract will be supplied in a form that is customary and legible for the data subject.

Right to object

Data subjects have the right to object to data processing by the association at all times. This can be made known in writing to the board of the association by the data subject.

Automated individual decision-making

Scintilla does not apply automated processing to personal data that could lead to legal consequences for the data subject, such as profiling. The association recognizes this right for those involved, but has not taken specific measures for this reason.

Retention period

For retention periods, a distinction is made between non-active members and active members. All details of the non-active members are manually deleted by DIGI within 3 months after the date on which the membership of the member in question is terminated. Active members are contacted 1 year after the last log-in to the e-mail system of the corresponding active member account, asking whether the account should be retained. In the absence of a response within 4 weeks, or upon receipt of a negative response, the member's details will be deleted within 6 weeks.

The logs and backups of the digital systems that contain digital data are stored for a maximum of 12 months.

Data breach

If a data breach is found, the board of the association must be informed. Depending on the gravity and size of the data breach, the board will take further steps. These can consist of informing those involved and/or submitting a request to DIGI to find a solution to the leak.

Contact details

The Elektrotechnische Studievereniging Scintilla is the holder of the data administration to which this document applies. The board of the association can be approached in writing via the address below:

E.T.S.V. Scintilla
Postbus 217
7500 AE, Enschede

The board is responsible for decision-making regarding data processing and for supervising the implementation of formed policies. Day-to-day management in both functional and technical terms has been transferred to DIGI; the committees responsible for Scintilla's digital systems.

Abbreviations

BIC	Bank Identifier Code
DIGI	Committee responsible for the digital systems of Scintilla
EEA	European Economic Area
ERO	Emergency Response Officer
GDPR	General Data Protection Regulation
IBAN	International Bank Account Number
IP	Internet Protocol
LDAP	Lightweight Directory Access Protocol
RDSH	Remote Desktop Session Host
RFID	Radio-frequency identification
SMART	Scintilla's Member Administration and Registration Tool
SOCS	Scintilla's Online Controle Systeem
STORES	Scintilla's Trading Organization for Reduced-Priced Electronics and Study-needs
URL	Uniform Resource Locator
UT	University of Twente

Appendix

A: Data categories

To simplify this document, all data is categorized, this appendix contains an overview of these categories.

Category 1	Category 2	Category 3	Category 4
<ul style="list-style-type: none"> • First names • Nickname • Initials • Last name • Date of birth • E-mail address 	<ul style="list-style-type: none"> • Student number • Titel (Salutation) • Titel (Degree) • Family name preposition • Primary field of study • Phone number • Postal address • UT-address • Starting year of study • Preferences regarding receiving messages via e-mail or text message • Permission to publish photos for the purpose of atmosphere impressions (yes/no) • Photos for atmospherical impressions • Bank authorisation preferences in regards to <ul style="list-style-type: none"> ◦ Membership Contribution ◦ Activities and purchasing system • Bank account number (IBAN) • BIC • Enrollment lists of activities, including payment authorisation and possible fields filled in by the member during enrollment in the activity • Payment history of purchasing system • IP-address • RFID-tags of cards registered by the member • Mailinglists for long-term involvement 	<ul style="list-style-type: none"> • Vir Prudens (yes/no) • Member of merit (yes/no) • Accounts of active members • Committee membership(s) 	<ul style="list-style-type: none"> • Membership number • Printing history • Committee history of active members, including function and start and end date • Auditing logs