

Privacy Policy for the Common Student System (*Felles studentsystem*, FS) Molde University College.

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1) Brief presentation of the Common Student System (FS)

The Common Student System (FS) is a study administration system, developed for universities, scientific colleges and public university colleges. The system has now also been made available to private colleges. When you apply for admission to and study at Molde University College, your personal data will be registered, processed and stored in FS.

A number of different applications are connected to the study administration system FS. Consequently, data registered in these applications will also be stored in FS. In various contexts, data stored in FS is shared with a number of different parties/institutions.

2) What is a privacy policy?

This privacy policy describes how Molde University College manages your personal data in the FS system. The purpose of this privacy policy is to inform you of the types of personal data processed, how it is processed, who is responsible for the processing, your rights and whom to contact.

3) What is considered personal data?

The term personal data includes any data, information and assessment that can be linked to you as an individual, cf. **GDPR Article 4 no. 1**. The determining factor in whether data is considered personal information, is whether it is fit to identify a specific person.

In some cases, data which, on its own, cannot be linked to an individual person, may constitute personal data if it is used in combination with other data.

4) The purpose of and legal basis for the processing of personal data in FS

Purpose

The purpose of processing personal data in FS is to protect your rights as an applicant, student, course participant or doctoral candidate, and to fulfil the institution's obligations and duties pursuant to the Act Relating to Universities and University Colleges.

Among other things, the processing of personal data in FS is necessary for Molde University College to

- process your application for admission to programmes of study/courses and registration for examinations
- perform necessary administration of your studies and you as a student
- document your results

Legal basis

This processing is authorized under Section 4-15 of the Act Relating to Universities and University Colleges and Article 6, no. 1, litra e), and no. 3, litra b), of the GDPR. Processing is necessary for the performance of a task carried out in the exercise of official authority and to comply with provisions established by the Act Relating to Universities and University Colleges. Processing is also carried out to enable the institution to protect your interests as a student in the best possible way. In certain contexts, the institution has furthermore chosen to supplement this legal basis by seeking consent for the processing of certain types of data.

5) Which types of personal data are processed in FS?

Currently, no sensitive personal data about you is stored or processed in FS.

The following personal data may be processed in FS: profile information (including your name, national identity number/D-number/S-number (11 digits), sex, contact information, information about your background, native language, photograph), application information, consent given by you, status (including legal residence and criminal records certificate, where relevant), semester registration data, billing information and information about programmes and courses of study.

Your personal data may come from:

1. You, submitted via the application portal on the Norwegian Universities and Colleges Admission Service website
2. You, submitted via *Søknadsweb*
3. You, submitted via *EVUweb*
4. You, submitted via *Studentweb*
- 5/8 National database of upper secondary school leaving certificates of education (*Nasjonal vitnemålsdatabase*, NVB)
6. Other universities/university colleges
7. Contact and Reservation Register
9. Others registering you in *EVUweb*
10. Others registering you in Nomination
11. Administrative officers at Molde University College
12. The National Population Register
13. The Norwegian State Educational Loan Fund
14. Digital examination systems
15. *Fagpersonweb*
16. User administration systems
17. The institution's accounting system

Voluntary registration

1. You, submitted via the application portal on the Norwegian Universities and Colleges Admission Service website
2. You, submitted via *Søknadsweb*
3. You, submitted via *EVUweb*
4. You, submitted via *Studentweb*

Registration of personal data via the application portal on the Norwegian Universities and Colleges Admission Service website, *Søknadsweb*, *EVUweb* and *Studentweb* is voluntary, but without your

personal data, we may not be able to process your applications. In the application portals on Søknaadsweb, EVUweb and the Norwegian Universities and Colleges Admission Service website, you can register information about yourself and link it to your application to a programme of study or enrolment in courses. On Studentweb you can register information about yourself and link it to your application to a programme of study, information about your background, enrolment in classes and registration for exams, applications and documents you upload. This information may be necessary for us to process your applications and for you to study at Molde University College.

5. The national diploma database (NVB)

If you apply for admission to Molde University College via Søknaadsweb, you can choose to give your consent for us to retrieve personal data about you from the National Diploma Database. The National Diploma Database includes most electronic diplomas issued by upper secondary schools from the year 2000 forward. If you consent, we will retrieve your name, national identity number (11 digits), the name of your school, subjects and results.

6. Other universities/university colleges

If you apply for admission to Molde University College have earned credits from another university/university college which also uses FS, you may consent to the institutions sharing your results with each other. With your consent, an administrative officer may retrieve all of your results from any institution in Norway that uses FS. In practice, that includes most universities and university colleges in Norway, with the exception of the Norwegian Business School (BI). We refer to the privacy policy of each respective institution for more information on how your personal data is processed.

If you have earned credits from a university or college outside of Norway, and the institution is part of the EMREX network, you may transfer your results to Molde University College. You can do this via Søknaadsweb and Studentweb.

If a Norwegian learning institution has imposed one or more sanctions on you that may also affect your application to/enrolment in other Norwegian learning institutions (pursuant to Sections 3-7 (8), 4-8 (1) to (3) or 4-10 (3) of the Act Relating to Universities and University Colleges), < Molde University College will receive personal data about you from the Register for Banned Students (*Register for utestengte studenter*, RUST). Only a select few individuals Molde University College will have access to this personal data. Please cf. the privacy policy for RUST.

7. Contact and Reservation Register (KORR).

FS may retrieve your e-mail address and mobile phone number from the Contact and Reservation Register (KORR). If you do not want anyone to access this contact information from KORR, you may reserve against this in KORR. Please see the website of the Agency for Public Management and eGovernment for more information.

Information registered without your consent

8. The national diploma database (NVB)

If you apply for admission to Molde University College via the Norwegian Universities and Colleges Admission Service, we will retrieve personal data about you from the National Diploma Database. The National Diploma Database includes most electronic diplomas issued by upper secondary schools from the year 2000 forward. We will retrieve your name, national identity number (11 digits), the name of your school, subjects and results.

9. Others registering you in EVUweb

In some cases, employers and others may register information about you in EVUweb. This normally happens when your employer is arranging for your studies or further and/or continuing education at

Molde University College. This data may be necessary for us to process the application/registration for enrolment in studies/courses.

10. Others registering you in Nomination

Nomination is a web application where external institutions can nominate exchange students for programmes at Norwegian institutions. If you have been nominated in Nomination you will have already been notified via e-mail. The following personal data may be registered in Nomination and transferred to FS: first and last names, sex, e-mail address, date of birth, nationality, and what you have been nominated for. The person nominating you may also upload documents to go along with the nomination. Anyone who has been nominated can access the personal data, as well as any uploaded documents, linked to them in Søknadsweb.

11. Administrative officers at Molde University College

In certain circumstances, it is necessary for administrative staff at Molde University College to register information about you in connection with your studies. Examples of this includes assessments linked to applications for admission, explanations for grades and appeals against grading, registrations linked to study completion.

12. The National Population Register

In order for your name and address to stay current in FS, we retrieve your name and address from the National Population Register.

13. The Norwegian State Educational Loan Fund

The Norwegian State Educational Loan Fund sends Molde University College lists of every individual who is a client of the loan fund. They do this so that we can know whose data to return to the loan fund for loan repayment purposes. See also item 8.6 below.

14. Digital examination systems

More and more examinations are administered in digital examination systems. Grades and explanations for grades, which are registered to you in these examination systems by lecturers and examiners, are forwarded to FS.

15. Fagpersonweb

Just like in digital examination systems, grades and explanations for grades may be linked to you in Fagpersonweb. Fagpersonweb is a web application used by lecturers and examiners. In addition to grading and explanations for grades, Fagpersonweb is also used for attendance registration. All personal data registered about you in Fagpersonweb will be forwarded to FS.

16. User administration systems

In order for Molde University College to create an account for you so that you can access our ICT services, your personal data is registered in a user administration system called Molde University College. We register your name and national identity number (11 digits), as well as where your faculty/department affiliation.

17. Accounting systems

At Molde University College, we use Molde University College to process payments of semester fees, course fees and other fees paid by students. This means that the following information about you is shared by FS with Molde University College: student number, name, customer group, any and all phone numbers, any and all addresses, e-mail addresses and URLs (weblinks), if such information has been registered about you.

6) In some cases, we process cases automatically

When you apply to Molde University College, a number of steps in the processing of your application will be performed automatically, either entirely or in part. Automatic processing is used in the following circumstances:

- assessment of whether you qualify for admission
- calculation of scores for admission
- allocation of places on programmes of study
- calculation of eligibility for various courses (via Studentweb)
- registration for lectures and examination and allocation of places in restricted courses
- monitoring of individual education plan
- creation of invoices
- calculation of qualifications when you complete a programme of study
- termination of admission in the event of insufficient progression
- calculation of final grade in courses with several assessments throughout the course

7) How long do we store your personal data?

In principle, all of your personal data is stored in the Common Student System (FS) permanently. There are, however, some exceptions:

Documents linked to applicants who apply via the Norwegian Universities and Colleges Admission Service, and who do not get admitted, are deleted when the admissions process is completed.

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

If Molde University College receives notice that you are dead, we will delete your contact information. Any applications for admission, registrations for lectures, courses, examinations, etc. will be removed.

8) We disclose your personal data to third parties

Disclosure or export of data is defined as any transfer of data save for use in the controller's own systems/processing or to the data subject itself or any other party receiving data on the data subject's behalf.

Molde University College may disclose or export data including personal data to other systems, i.e. external data processors, whenever it is deemed necessary.

Your personal data will not be disclosed to countries outside of the EU/EEA, or to any international organizations.

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

- 1) Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research (Provider of FS)
- 2) University Center for Information Technology (USIT) at the University of Oslo (operator of FS)
- 3) Student Welfare Organization of Molde University College
- 4) National Population Register
- 5) Norwegian State Educational Loan Fund
- 6) Altran Norway AS (provider of UAS/user administration systems)
- 7) Instructure (provider of LMS)
- 8) Inspera Assessment (provider of digital examination system)
- 9) TimeEdit AB (provider of scheduling system)
- 10) Kong Arthur AS (provider of integration services to LMS, scheduling system)

- 11) Unit4 (provider of accounting system)
- 12) Other universities/university colleges
- 13) Norwegian Agency for Quality Assurance in Education (NOKUT)
- 14) BIBSYS/other provider of library systems
- 15) Statistics Norway (SSB)
- 16) Norwegian Centre for Research Data (NSD) and Database for Statistics on Higher Education (DBH)
- 17) Nordic Institute for Studies in Innovation, Research and Education (NIFU)
- 18) Norwegian Directorate of Health
- 19) Other parties with the right to access your personal data

1) Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research FS is developed by Unit. Unit staff who need to access your personal data as part of their job will be granted such access.

2) University Center for Information Technology (USIT) at the University of Oslo (UiO) FS is operated by USIT at UiO. USIT staff who need to access your personal data as part of their job will be granted such access.

3) Student Welfare Organization of Molde University College
If you have paid the semester fee for the current semester or if you have received an offer for admission to a study programme in the last two months, the various student welfare organizations across Norway may access personal data about you from Molde University College. They do this so they can know that you're a student and that you are entitled to a student discount when you use their services. The student welfare organization may retrieve your national identity number (11 digits), your name, when you last paid the semester fee and your student ID.

4) National Population Register
Molde University College will send the following personal data about you to the National Population Register: name, national identity number (11 digits) and address. We do this 2 times a year to make sure your personal data is up to date.

5) Norwegian State Educational Loan Fund
If you are a client of the Norwegian State Educational Loan Fund, data about you will be sent to the loan fund as soon as your status as a student has been registered. The following personal data is transferred to the Norwegian State Educational Loan Fund once a day: national identity number/D-number (11 digits) and the university/college you are enrolled at.

If you have completed an examination and/or have had education completed abroad or stays abroad pre-approved, data about you will be sent to the loan fund. The following personal data is transferred to the Norwegian State Educational Loan Fund once a day: national identity number/D-number (11 digits), which university/college you have completed your examination at, the results from the examination (pass/fail/not graded, if pass: also the grade).

We transfer your personal data to the Norwegian State Educational Loan Fund so that you don't have to document your student status and completed education.

6) User administration systems
In order for Molde University College to create an account for you so that you can access our ICT services, your personal data needs to be registered in a user administration system called Microsoft Identity Manager (MIM). For this purpose, the provider Altran Norway AS accesses personal data,

including address data, photo, group affiliations and information about registrations for courses and examinations from FS to Molde University College .

7) Instructure (provider of Canvas)

Molde University College uses Canvas for teaching purposes, and sometimes also in connection with examinations. As a result, Instructure, who develops and operates Canvas will have access to your personal data, such as name, Feide-ID, email-address and course information. In addition, lecturers at the college will provide feedback to the student.

8) Inspira Assessment (provider of digital examination system)

Molde University College uses Inspira Assessment examination system for a number of its examinations. In order for you to take a digital examination, we send personal data about you to Inspira Assessment .As a result, Inspira AS, who develops and operates Inspira Assessment, will have access to your personal data, such as name, Feide-ID, email-address. In addition, lecturers at the college will provide feedback and evaluate the examination answers.

9) TimeEdit (provider of scheduling system)

Molde University College uses the TimeEdit scheduling system to schedule lectures and examinations. As a result, TimeEdit AB, who develops and operates TimeEdit, will have access to your personal data, including name, Feide-ID, email-address, phone number, occupation and registration for courses.

10) Kong Arthur AS (provider of integration services to LMS, scheduling system)

In order for you to access and use systems TimeEdit og Canvas , FS transfers personal data to these systems. As a results, Kong Arthur AS, who develops and operates integration services that transfer data between systems, will have access to your personal data: name, email-adress, student-ID, FS-ID and registrations for courses.

11) Unit4 (provider of accounting system)

At Molde University College we use Agresso to process payments of semester fees. As a result, Unit4 will have access to the following data about you: student-id, name, customer group, phone numbers, email-adresses and URLs.

12) Other universities/university colleges

- Application for admission through the Norwegian Universities and Colleges Admission Service
When you apply for admission to Molde University College through the Norwegian Universities and Colleges Admission Service, your application will in most cases be processed by Molde University College. If you have applied for admission to one or several other universities/colleges, they may process your application on behalf of all of the universities/colleges to whom you have applied. In these cases, they will process and store personal data about you in connection with your application(s). Your application will primarily include personal data you have registered yourself, through the application portal on the admission service website.

- Consent to exchange of results

If you have earned assessments and grades from another university/college and wish to use these results in connection with an application for admission to another Norwegian university/college, you may consent to an exchange of results. When you have given your consent, an administrative officer may retrieve all of your results from any institution in Norway that uses FS. In practice, that includes most universities and university colleges in Norway, with the exception of the Norwegian Business School (BI). We refer to the privacy policy of each respective institution for more information on how your personal data is processed.

- Recognition of education completed abroad

If you have applied for recognition of education completed abroad, case-specific data related to your application, including personal data about you, will be transferred to GAUS, which is a search service for recognition of education completed abroad. Other Norwegian universities/colleges may search for and access personal data about you in GAUS. Please cf. the privacy policy for GAUS.

- Sanctions imposed as a result of student conduct

In cases where a sanction issued against you by Molde University College is registered, the administrative decision to order the sanction will normally be forwarded to the Register for Banned Students (RUST). Sanctions are issued as a result of one or more of the following: use of a false diploma, disruptive/harassing conduct, dangerous conduct, aggravated breach of confidentiality, gross negligence during internship or clinical instruction, cheating, attempted cheating, aiding in cheating or expulsion based on a suitability assessment. If you, during the sanction period, have applied for admission to another Norwegian university/college, your personal data will be transferred to this university/college. A few select staff at this information will be able to access your personal data. In some circumstances, this also applies if you have registered for an examination. Please cf. the privacy policy for RUST.

13) Norwegian Agency for Quality Assurance in Education (NOKUT)

- Recognition of education completed abroad

If you have applied for recognition of education completed abroad, case-specific data related to your application, including personal data about you, will be transferred to GAUS, which is a search service for recognition of education completed abroad. NOKUT may search for and access personal data about you in GAUS.

14) BIBSYS/other provider of library systems

In order for you to be registered as a borrower at Molde University College and use the library's services, we transfer personal data about you to BIBSYS/other library system. This only applies to students who are registered as students in the current semester and who have paid their semester fee.

15) Statistics Norway (SSB)

In various contexts, Molde University College will transfer personal data about you to Statistics Norway for statistical purposes. This includes personal data related to

- semester registration
- your examination result(s)
- your completed programme(s) of study
- your earned qualification(s) for which a diploma will be issued
- you and your eligibility for admission to a doctoral programme

16) Norwegian Centre for Research Data (NSD) and Database for Statistics on Higher Education (DBH)

In various contexts, Molde University College will transfer personal data about you to NSD and DBH for research and statistical purposes. This includes personal data related to

- your application for admission to programmes of study
- your semester registration, payment of semester fees and registration(s) for courses
- your completed examinations
- your earned qualifications
- your exchange period(s)
- whether your study progression is on par with your individual education plan
- you and your doctoral programme

17) Nordic Institute for Studies in Innovation, Research and Education (NIFU)

In various contexts, Molde University College will transfer personal data about you to NIFU for research purposes. This includes personal data related to your master's degree (in some cases your bachelor's degree) and your doctoral degree.

18) Norwegian Directorate of Health

If you have completed a programme of study qualifying you for authorization or a licence pursuant to the Health Personnel Act or the Act Relating to Veterinarians or Other Animal Health Personnel, Molde University College will transfer personal data about you to the Norwegian Directorate of Health/Health Personnel Register (HPR). This data includes your name, national identity number (11 digits), information about your programme of study and of the qualifications you have earned. That way, you don't have to personally apply for authorization when you complete eligible programmes of study.

19) Disclosure of personal data pursuant to the Freedom of Information Act

When Molde University College receives petitions for access pursuant to the provisions of the Freedom of Information Act, the provisions of the Personal Data Act can not be used to limit this right of access whenever the petition includes personal data. Therefore, Molde University College may transfer personal data about you to other parties beyond those mentioned in this privacy policy.

9) Personal data safety

Molde University College regularly perform risk and vulnerability analyses to protect your personal data in FS. In addition, various security measures have been implemented, such as access control, to keep the number of people who have access to your personal data as low as possible. All registrations are logged.

10) Your rights

Right to information and access

You have the right to information about how <Navn på utdanningsinstitusjon> processes your personal data. The purpose of this privacy policy is to provide you with any and all information you have the right to get.

You also have the right to view/access any and all personal data registered about you at Molde University College. You also have the right to request a copy of the personal data registered about you if you so wish.

Right to correction

You have the right to have corrected any and all incorrect personal data about you. You also have the right to supplement any and all incomplete data registered about you. Please contact us if you believe we have registered incorrect or incomplete personal data about you. It is important that you justify and, if relevant, document why you believe the personal data registered is incorrect or incomplete.

Right to limit processing

In certain circumstances, you have the right to demand limited processing of your personal data. Limiting the processing of personal data means that your personal data will still be registered, but the opportunities for further processing are limited.

If you believe that personal data about you is incorrect or incomplete, or you have filed a complaint against the processing of your data (read more about this below), you have the right to demand to

demand that the processing of your personal data be limited temporarily. This means that processing will be limited until, if relevant, we have rectified your personal data, or until we have been able to assess whether your complaint is justified.

In other circumstances you may also demand a more permanent limitation on the processing of your personal data. In order to qualify for the right to limit processing of your personal data, the conditions established by the Personal Data Act and Article 18 of the GDPR must be met. If we receive a request from you to limit processing of your personal data, we will assess whether the statutory conditions have been met.

Right to erasure

In certain circumstances you have the right to demand that we erase your personal data. The right to erasure is not unconditional, and whether this applies to your situation must be assessed in light of relevant privacy legislation, i.e. the Personal Data Act and GDPR. Please contact us if you want to have your personal data erased. It is important that you justify why you want the personal data erased, and, if possible, that you also specify which personal data you want erased. We will then consider whether the conditions for erasure, as established by law, have been met. Please be advised that the law allows for us to make exceptions to your right to erasure. For example, we may need to store personal data for the purpose of performing a task in compliance of the Act Relating to Universities and University Colleges, or for reasons of public interest, such as archiving, research and statistics.

Right to object

You may have the right to file an objection against the processing, i.e. object to the processing, on grounds that you have a specific need to stop the processing, e.g. if you have a need for protection, have a secret address, etc. The right to object is not unconditional, and it is contingent upon the legal basis for the processing, and on your particular circumstances. The conditions are established by Article 21 of the GDPR. If you object to processing of your personal data, we will consider whether the conditions for filing an objection have been met. If we find that you have the right to object to the processing and that your objection is justified, we will discontinue processing, and you will have the right to demand erasure of the data. Please be advised that we, under certain circumstances, may make exceptions from erasure, e.g. if we have to store your personal data for the purpose of performing a task in compliance with the Act Relating to Universities and University Colleges, or for reasons of public interest.

Right to file complaint against processing

If you believe we processed your personal data incorrectly or unlawfully, or if you believe we failed to protect your rights, you have the right to file a complaint against processing. Please see item 11 below for how to contact us.

If we dismiss your complaint, you may file your complaint with the Norwegian Data Protection Authority (DPA). The DPA is responsible for making sure Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

11) Contact information

Data controller

Molde University College is the data controller of personal data in the Common Student System, cf. **GDPR Article 4 no. 7.**

If you wish to exercise your rights as established in item 9 above, please contact us at behandlingsansvarlig@himolde.no. We will process your request as soon as possible and within 30 days at the latest..

Data protection officer

Molde University College has appointed a data protection officer whose responsibility it is to protect the personal data interests of both students and staff at Molde University College. You may contact the data protection officer about the administrative processing of personal data at Molde University College via e-mail: personvernombud@himolde.no

Service provider

Unit – The Norwegian Directorate for ICT and Joint Services in Higher Education and Research is the provider of FS. This means that Unit develops and maintains FS, and Unit is also responsible for the day-to-day operation of FS. As part of this task, a select few of Unit's staff have access to all personal data registered in FS, including personal data sent to and from FS.

Contact information for Unit: fs-sekretariat@fsat.no