

Privacy policy for the Student ID app

Molde University College

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1) Brief presentation of the Student ID app

The Student ID app is accepted as a valid student ID with, among others, student welfare organizations and public transport companies, and can replace physical ID cards and paper receipts. In order for the student ID to be valid, you must pay the semester fee and complete the semester registration.

2) About this privacy policy

This privacy policy describes how Molde University College manages your personal data in the Student ID app. 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 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 the processing of personal data in the Student ID app

Purpose

The purpose of processing personal data in the Student ID app is to give [you as a student](#) the option of downloading your personal semester receipt in a digital format, so that you can use it in situations where you need to document your student status. The app is accepted as a digital student ID by, among others, student welfare organizations and Norwegian public transportation companies.

Legal basis

For institutional use

The legal basis for the processing of personal data in the Student ID app is [GDPR Article 6 no, 1 litra c, cf. no. 3 litra b, and provisions in the Act Relating to Universities and University Colleges_§ 4-15.](#)

For personal use

Statutory authority for the processing of personal data in the Student ID app is based on consent. Students are asked to give consent when logging on to the app.

5) Which kinds of personal data are processed in the Student ID app, and how long to we store your personal data?

The Student ID app shows your name and place of study, and whether you have paid the semester fee and completed the semester registration in the current semester. The app also shows your picture, which your learning institution took of you for the purpose of issuing you a student card. The personal data presented in the app is retrieved from the study administration system Common Student System (FS), as well as FEIDE (Joint Electronic Identity), which is the Ministry of Education

and Research's preferred solution for secure identification in the education sector. The data is stored locally on your device and you may delete them whenever you want.

Downloading the app and logging on is entirely voluntary, and you control to whom you show your digital student ID. Using the app is voluntary. If you choose not to use the app you may, at most universities and university colleges, request a paper-based semester receipt.

6) Automatic processing

Your personal data will not be made subject to automated processing or profiling.

7) Disclosure of 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
The Student ID app is provided by Unit. Unit staff who need to access your personal data, as well as data about your activity in the Student ID app, as part of their job will be granted such access. They need this access in order to provide user support and, if relevant, correct errors as part of their duties.

2) UNINETT AS

When you log in to the Student ID app, you use the log-in services FEIDE and Dataporten. FEIDE and Dataporten are developed and provided by UNINETT AS. UNINETT AS staff may access your FEIDE user name and IP address, provided they need such access in order to perform their duties. They need this access in order to provide user support and, if relevant, correct errors as part of their duties. Your personal data will be erased from FEIDE after six months.

8) Personal data safety

To protect your personal data in the Student ID app, various security measures have been implemented; all transfers to the app are encrypted. In addition, Unit regularly perform risk and vulnerability analyses and testing of the security in the Student ID app.

9) Your rights

Right to information and access

You have the right to information about how Molde University College 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 10 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.

10) Contact information

Data controller

Molde University College is the data controller of personal data in the Student ID app, 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 Student ID app. This means that Unit develops and maintains Student ID app, and Unit is also responsible for the day-to-day operation of Student ID app. As part of this task, a select few of Unit's staff have access to all personal data registered in Student ID app.

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