THE STUDENT ASSOCIATION

GDPR for Dummies

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What is GDPR?

General Data Protection Regulation (GDPR) is the European Union privacy law that took effect in Europe on May 25th, 2018. GDPR regulates how personal data is processed, used, stored, and exchanged within all organizations in Europe – including SASSE. All active members in SASSE need to be careful and consistent when collecting, handling, and storing personal data and this guide will briefly introduce what data is considered personal data and how we process, use, store, and exchange that data within SASSE.

What is Personal Data?

Personal data is any information about a specific person that <u>easily can be tied to the person it concerns</u>. The most common types of personal data within SASSE include but is not limited to:

- Names

- Photos

- Student IDs

- Email addresses

- Telephone numbers

- Allergies

Generally, lists of names, phone numbers etc. is considered personal data. A rule of thumb is that the following type of documents should be treated as personal data documents:

- Spreadsheets of recruitments

- Spreadsheets of member contact information

- Spreadsheets of event attendance

Most documents do not contain personal data. If you are not certain if a document is considered to contain personal data, ask the IT Committee president.

A document containing data does not have to be considered personal data if it is not possible to tie the data to a specific person. For example, a document containing the quantity of people attending an event that are allergic to nuts is not considered to be personal data as there is no way of identifying who is allergic; However, a spreadsheet containing the names of all attendants to an event and a column stating if they are allergic to nuts or not is considered to be personal data.

Sensitive Personal Data

Furthermore, there is a more serious form of personal data called **sensitive personal data**. Sensitive personal data refers to personal data regarding racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, and biometric data. Fortunately, we do not handle sensitive data within SASSE apart from one exception: allergies. Allergies are considered sensitive personal data which means that it is extra important that any documents containing information of specific people's allergies is treated as personal data.

Storing Personal Data in SASSE

All personal data documents need to be easily accessible for the IT Committee president.

All personal data is to be saved in the folder named "Personal Data" in the Team Drive of the committee board or project that it concerns. It is not allowed to save personal data anywhere else. Especially not locally on your personal computer.

To ensure that personal data documents does not have to be downloaded to be edited, only save personal data documents in Google's online document types (Google Documents, Spreadsheets, and Presentations).

It is each committee president's and project leader's responsibility to make sure that personal data that is no longer needed is removed from the committee board's or project's personal data folder.

Team Drives

All committee boards and projects within SASSE have their own Team Drive in Google Drive. This Team Drive is tied to the email accounts that are involved in the committee or project. To access the Team Drive, simply log into your SASSE email account, navigate to Google Drive, and select Team Drives in the menu to the left. Some accounts are connected to multiple Team Drives.

The Team Drive is the platform where all committee boards and projects should save and share their files with one another. How the Team Drive is structured is up to each committee board or project, except for the Personal Data folder. In every Team Drive, there must be a folder named "Personal Data". All documents with personal data should be saved in this folder and nowhere else. It is not allowed to move the folder into another folder, create more personal data folders, or remove the folder.

Deletion of Personal Data

Apart from actively removing members' personal data on their request, we are obligated to remove personal data after a reasonable amount of time. For example, when an event is finished, the document containing the members attending the event should be removed.

It is the committee president's or project leader's responsibility to make sure that personal data documents are deleted.

Generally, the following timelines apply to personal data stored in SASSE:

- General member data stored in the member register on sasse.se is stored as long as a person is a member of SASSE. People that have not paid their membership fee during the year will be deleted in the summer.

- Contact information to members of committee boards and project groups must be deleted within one month after their job has ended.

- Lists of attendants at a SASSE event should be deleted within a month after the event has taken place.

- If there is no reason for SASSE to store the personal data, it should be deleted within a month of when it was used.

If you have any special reasons as to why certain personal data should not be removed according to the guidelines above, contact the IT Committee president.

Sharing Personal Data in SASSE

Personal data documents should only be shared within SASSE through access to the personal data folder in each committee board's or project's Team Drive. Do not email personal data documents to one another or share them in any other way.

If you need to share a personal data document to a SASSE member that does not have access to the personal data folder, contact the IT Committee president.

External Sharing of Personal Data

All third parties must have signed a Personal Data Assistant Agreement to be allowed to receive personal data documents from SASSE. If you are uncertain whether a company or organization have signed such a document, contact the IT Committee president.

If you need to share a personal data document with a third party that has not signed a Personal Data Assistant Agreement, contact the IT Committee president to receive a copy for the third party to sign. When the agreement is signed, hand the original copy back to the IT Committee president.

If you need to share a personal data document with a third party that has signed a Personal Data Assistant Agreement, it is allowed to email the document to the third party. In order to not have the personal data document saved in your email outbox, make sure to delete the email with the attached file afterwards.