

Privacy notice on education in the context of lifelong learning

Disclaimer: the English version of this privacy notice is a translation of the original in Dutch and for information purposes only. In case of a discrepancy, the Dutch original will prevail.

This privacy notice is specifically intended for those interested in, and participants in, lifelong learning programmes at Leiden University or the Leiden University Medical Centre (LUMC).

Leiden University and the LUMC consider it important to handle your personal data with care. The General Data Protection Regulation (GDPR) is the legislation that forms the basis for how Leiden University and the LUMC handle your personal data.

In this privacy statement, we provide you with information about the personal data we process, the purposes for which we do so, the parties with whom we share your data, and the rights you have.

For what purposes does Leiden University/the LUMC process your personal data?

The personal data we collect from you is processed by Leiden University or the LUMC for the following purposes:

- Enrolment (including the waiting list) and participation in a course;
- Sitting an (entry) test;
- Gaining access to the course portal and the digital learning environment;
- Enabling participants to download and use study materials;
- Communicating with participants regarding practical matters, for example when a change to the programme occurs due to unforeseen circumstances;
- Processing payments;
- Awarding and issuing certificates and certificates of attendance;
- An overview of the events you have attended with us as a participant for the purposes of accrediting bodies (5-year retention period in the event of checks by the professional body) as well as internal audits (10-year retention period in the context of the completeness of financial records and audit checks).
- Conducting evaluations to improve the quality of the courses;
- Providing proof of enrolment;
- Crediting accreditation points earned;
- Sharing exam results for the purpose of registration with a professional register;
- Sending newsletters to interested parties about our course offerings.

What personal data do Leiden University and the LUMC process?

When you sign up for a course newsletter:

- Name;
- E-mail address.

When you join a course waiting list:

- Name;

- E-mail address.

When you enrol for a course:

- Name;
- Date of birth;
- Home address details;
- Address details of the company you work for;
- Personal and/or work email address;
- Telephone number;
- Gender;
- Payment details.

For certain courses, you may also be asked to provide:

- Academic results (course details and (exam) results);
- Year of study;
- Student card / student number;
- Specialisation and/or preferred areas of interest;
- Occupation and/or job title;
- BIG number;
- LUF membership (Leiden University alumnus);
- Contact preferences (your consent to receive our course notifications based on your areas of interest).

Recording of video and audio material

In the context of online teaching, hybrid courses or other educational activities, Leiden University or the LUMC may record audio and video material, for example by recording lecture sessions so that they can be viewed at a later date.

Participants will be informed in advance when recordings are being made. Recordings are made solely for educational purposes that are known in advance and will not be retained for longer than is necessary for that purpose.

Why are Leiden University and the LUMC permitted to process your personal data?

Leiden University and the LUMC may only process your personal data on the basis of one of the legal grounds (reasons) set out in the GDPR. Leiden University and the LUMC process your personal data on the basis of the following legal ground(s):

1. Executing and agreement

Leiden University and the LUMC process personal data to the extent necessary for carrying out the agreement we have entered into or will enter into with participants. The processing is necessary to enable participation in the course.

2. Legal obligations

In addition, Leiden University and the LUMC process personal data in order to comply with legal obligations. This includes, amongst other things, data required for financial administration, the issuing of certificates, and the conducting and recording of

examinations.

3. Legitimate interest

In some cases, Leiden University and the LUMC process personal data on the basis of a legitimate interest. This may be the case, for example, when carrying out evaluations or recording video and audio material during online or hybrid courses, insofar as this is necessary for the provision of education. In doing so, a careful balancing of interests is always carried out and appropriate safeguards are put in place to protect participants' privacy.

4. Consent

Finally, Leiden University and the LUMC may process personal data on the basis of your consent, for example to enable you to receive newsletters. You can withdraw your consent at any time via the unsubscribe link in the email or via privacy@bb.leidenuniv.nl or privacy@lumc.nl.

Who do Leiden University and LUMC share your personal data with?

Within Leiden University and the LUMC, your personal data will only be shared with staff who require this information to carry out their duties. This includes, for example, staff involved in the organisation and delivery of the course, participant administration or financial administration. Your personal data will be shared with external educational institutions and/or external lecturers if the course(s) in question are taught by external educational institutions and/or external lecturers in collaboration with Leiden University or the LUMC.

In addition, Leiden University and the LUMC make use of external parties to provide their services. When these parties process personal data on behalf of Leiden University and the LUMC, they act as data processors within the meaning of the GDPR. This includes, for example, AFAS, D2L (Brightspace) and Surf (eduID and SURFconext). Leiden University and the LUMC enter into agreements with these data processors to ensure that your personal data is handled confidentially and with due care. These agreements are set out in writing in so-called data processing agreements.

Leiden University and LUMC do not sell your data to third parties. Leiden University and LUMC may only disclose your personal data to third parties if, for example, you have given your consent or if this is necessary to fulfil an agreement between you and the University. In exceptional cases, Leiden University and LUMC may be legally obliged to disclose personal data to competent authorities. This may, for example, involve the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) in the context of supervision, or the police where they are authorised by law to request personal data, for example through a summons or a court order.

Parties involved in the processing of your personal data may also be based outside the European Economic Area (EEA). Specific rules apply to the transfer of personal data to countries outside the EEA. Data may only be transferred to third countries that offer an adequate level of protection. This may be on the basis of an adequacy decision by the European Commission, appropriate safeguards and/or specific exceptions. If you would like further information on this matter, please contact us via privacy@bb.leidenuniv.nl.

How long will your data be used and stored?

Leiden University and the LUMC do not retain your personal data for longer than is necessary for the purposes for which it was collected. The following retention periods apply:

- Participants' personal data is retained for up to 11 years after completion of the course;
- Course details and (exam) results are retained for up to 11 years after completion of the course
- Financial data is retained for up to 8 years after the last payment, in accordance with the statutory tax retention obligation;

Once these time limits have expired, personal data will be deleted.

Your privacy rights and how to exercise them

As a data subject, you have a number of rights regarding your personal data. Through this privacy notice, we provide you with timely, clear and comprehensive information about the processing of your personal data. In doing so, we are fulfilling your right to information. Set out below are the other rights you have under the GDPR, along with details of when and how you can exercise these rights.

Right of access: Upon request, you may access the personal data we process about you.

Right to object: You have the right to object to the processing of your personal data carried out based on the legal ground applied.

Right to rectification: Upon request, you may have any personal data we process about you that is out of date, incomplete or inaccurate amended.

Right to erasure: You may request that your data be erased.

Right to restriction of processing: You may request that the processing of your data be restricted. Your data will then be temporarily stored only and will not be used. This right is important if, for example, you have requested that certain data be rectified.

Right to withdraw your consent: You always have the right to withdraw the consent you have given. You do not need to provide a reason for this. Your data will no longer be processed after withdrawal of consent. If your data has been anonymised, the withdrawal of consent will no longer have any effect. After all, the data can no longer be traced back to you.

Right to data portability: You may request to receive your personal data in a structured, commonly used and readable format.

If you wish to exercise any of your rights, please address your request to the Privacy Office at Leiden University via privacy@bb.leidenuniv.nl, or the LUMC via privacy@lumc.nl and fg@lumc.nl.

Questions and complaints

If you have any questions about the processing of your personal data, please contact your contact person in the first instance. You can also contact the Privacy Office at Leiden University via privacy@bb.leidenuniv.nl, or with the LUMC Privacy Team via



privacy@lumc.nl .

Leiden University and the LUMC have appointed a Data Protection Officer (DPO). The DPO is responsible for overseeing compliance with the GDPR and ensuring the protection of personal data during processing. You can contact the DPO if you have any questions about the processing of personal data or if you wish to lodge a complaint via dpo@leidenuniv.nl or fg@lumc.nl.

You also have the right to lodge a complaint with the supervisory authority, the Dutch Data Protection Authority (autoriteit persoonsgegevens), via <https://autoriteitpersoonsgegevens.nl>.

Version

The privacy notice was last amended on 16 July 2026.