

The Student Satisfaction Survey and your personal data

The University of Luxembourg invites you to participate to its Student Satisfaction Survey. Performing this survey requires the processing of your personal data i.e. information pertaining to you.

This Privacy Notice explains who we are, the personal data we collect, how we use it, who we share it with, and what your legal rights are.

Who is involved in processing your personal data?

The University of Luxembourg is the controller for the personal data concerned by this study. The University of Luxembourg is a public higher education and research establishment operating under the supervision of the Ministry of Higher Education:

Université du Luxembourg
2, avenue de l'Université
L-4365 Esch-sur-Alzette

The University's Data Protection Officer can be contacted at dpo@uni.lu.

University of Luxembourg's data protection policy can be viewed here:
https://www.en.uni.lu/university/data_protection/data_protection_policy_and_faq

The University of Luxembourg has engaged the company Ilres S.A. (hereafter "Ilres"), – whose registered office is located at L-8070 Bertrange, 41, rue du Puits Romain – to undertake the necessary interviews. Ilres processes the personal data required for this study in accordance with the instructions of the University of Luxembourg; thus, Ilres is the processor.

Ilres will process your personal data and responses for the following purposes determined by the University:

- To conduct satisfaction surveys;
- For entry into the prize draw for students and doctoral students who participate in the survey. Prize draw terms and conditions can be found here:
https://www.en.uni.lu/university/data_protection/satisfaction_survey

Ilres is a leading provider of marketing and opinion research.. With the help of proven methodologies and innovative technologies, Ilres has been providing quality data to its clients in a timely and securely manner. For more information about Ilres, visit www.ilres.com/accueil/

Ilres will process your personal data and responses in strict confidence in accordance with this Privacy Policy.

What personal data is processed, and for what purpose?

a) Information communicated by University of Luxembourg to Ilres :

The University of Luxembourg has shared with Ilres the following information to carry out a satisfaction survey on their behalf in a confidential way, meaning that University of Luxembourg will not be able to know who answered what. Ilres will carry out a process of anonymization and anonymous survey data will be communicated to the University of Luxembourg. This way, University of Luxembourg can warrant that people can answer honestly, without fear of giving their real opinion about their academic authority:

- Your e-mail address, with the purpose of inviting you to participate in the survey. If you complete the survey questionnaire, you will be eligible to participate to the prize draw conducted by the University of Luxembourg. Ilres will draw at random the e-mail addresses and use them to come back to the winners about the delivery of the prize.

b) Information collected by Ilres :

- Ilres will collect the data needed to manage the survey, i.e., if you have completed the survey questionnaire or not, and when you finished it. These information are necessary to send reminders to those who didn't answered yet.
- Ilres will collect the data asked in the questionnaire: On the one hand, this includes the information needed to perform segmented analyses based on demographic profiles (e.g., sex, age, , type of studies). On the other hand, it includes your opinion about the services offered by the University of Luxembourg. Ilres will communicate this data to the University of Luxembourg in an anonymous form. These information are necessary to help the University of Luxembourg to improve its services.
- The University of Luxembourg would like to better understand experiences of inclusion of its students and improve these experiences if needed. It therefore needs to know the main sources of dissatisfaction among its students in order to assess what measures might be put in place to improve inclusion. These reasons could be sensitive personal information, for which we need your specific consent. You are not obliged to communicate the reasons of your dissatisfaction concerning inclusion at the University of Luxembourg, and you can skip the question by ticking "prefer not to say". Should you choose to answer, please be assured that the information will be used for the sole purpose of obtaining statistical data on inclusion. This information, like that from all other answers given in this survey, will be treated confidentially by Ilres, without the University of Luxembourg knowing that it is from you rather than from another respondent.

The University of Luxembourg may organize a reflection forum on future directions of teaching. Ilres will provide to the University of Luxembourg a separate file with the e-mail address of the participants who indicate into the questionnaire that they are interested to such initiative and

accept to be contacted into the future by the University on that topic. This separate file will contain only the e-mail address of the participants, not their other answers to the questionnaire. The University of Luxembourg can assure you that you will NOT be identifiable in any published results.

What is the legal basis for processing this personal data?

The personal data processing described above is lawful insofar as it is necessary for the performance of the legitimate interest which the University of Luxembourg has in having at its disposal the information required to improve its services and be able to adapt them to the needs of its students (article 6.1. f) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data hereafter “GDPR”).

Furthermore, although the legal basis for the processing is not consent as defined by the applicable data-protection legislation, please note that participation in the study is not mandatory and will only occur if you accept to provide the information requested in the questionnaire.

In addition, the personal data processed to better understand experiences of inclusion of its students and improve these experiences if needed might involve processing of sensitive data. Your explicit consent will be the legal basis of this processing of sensitive data (article 9.2 a) GDPR). As mentioned, you are totally free to decide to answer to this question and to provide sensitive data if you consider necessary.

Who will have access to the personal data processed?

The data and information processed by Ilres will be stored via a private cloud-based system on servers located in the European Union. The provider of the cloud service through which the information is recorded is not permitted to use this data; the provider is only allowed to access it for the purpose of server maintenance.

Ilres uses a data collection software made available by the company NIPO Software BV, established at Amsteldijk 166, 1079 LH Amsterdam. This company will only process pseudonymised data on the sole purpose to give access to its data collection software, without access to e-mail address of the respondents.

Ilres will send the information collected via the survey questionnaires to the company Dataexpert Services Kft., established at 4026 Debrecen, Hungary, Vendég street 84, 1/7. This company will help Ilres to compile the data in the required format. This company will only process pseudonymised data, without access to e-mail address of the respondents.

Ilres will send the processed data to the University of Luxembourg on an anonymous format, i.e. the answers to questionnaire without possibility of linking them to a respondent.

How will Ilres ensure your personal information are secure?

Ilres will implement security measures to protect the personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of or access to personal data transmitted, stored or otherwise processed on behalf of the University of Luxembourg. These measures are notably the following:

- The pseudonymisation and encryption of personal data.
- Means allowing to guarantee the constant confidentiality, integrity, availability and resilience of systems and services used for the processing.
- Means allowing to restore availability and access to the data in appropriate delays, in case of physical or technical incident.
- Regular tests, assessments and evaluation of the security measures effectiveness against data destruction, loss, alteration, disclosure or unauthorized access risks, and generally any unlawful processing.
- Use of providers who are ISO 27001:2013 certified.

For how long will the personal data be processed?

Ilres will only retain your data in a way that can identify you for as long as is necessary to support the research project and findings. In practice, this means that once Ilres has satisfactorily reported the anonymous research findings to the University of Luxembourg, and conducted the prize draw, it will securely remove your personal, identifying data from its systems, by the 31st of May 2023 at the latest.

Will the personal data be sent outside the European Union?

The personal data processed will not leave the European Union.

What are your rights?

Every person whose personal data is processed as part of the study can exercise the following rights:

- a) Right of access: The right to request information pertaining to their processed personal data.
- b) Right to rectification and erasure: The right to have their personal data rectified if it is inaccurate, and the right to request that their personal data be deleted.
- c) Right to restriction of processing: The right to request that processing be restricted, either for the duration required to verify the accuracy of certain data or because

the processing is unlawful or no longer necessary; or for the time necessary to verify that the legitimate interests of the data controller prevail over the interests of the person who has objected to the processing.

- d) **Right to object:** The right to object to the processing of their personal data. For example, if you don't want that the University of Luxembourg uses your e-mail address for satisfaction survey purpose.
- e) **Right to lodge a complaint with the supervisory authority:** If a person concerned feels that the University of Luxembourg is not respecting the former's rights with regard to the processing of their personal data, they may lodge a complaint with a supervisory authority. For Luxembourg, this supervisory authority is the National Data Protection Commission (<https://cnpd.public.lu/en.html>).

<https://cnpd.public.lu/fr/support/contact.html>

or by post to 15, Boulevard du Jazz

Service des réclamations L-4370 Belvaux

How can you exercise these rights?

You can submit a request regarding any of the rights detailed above by contacting the Data Protection Officer of the University of Luxembourg by post or by e-mail:

Email: dpo@uni.lu

Post: Employee and Student Satisfaction Survey
Data Protection Officer
2, avenue de l'Université
L-4365
Esch-Belval

Please note that the data collected will be anonymised as soon as possible, most likely before the 31st of May 2023. Therefore, it is possible that this data will have already been anonymised when you submit your request, in which case the request will not be applicable.

Finally, please be aware that the University of Luxembourg will store your request and the responses thereto as part of its legitimate interest in retaining proof that your request has been handled; this proof is necessary should it need to establish, exercise or defend its rights.

In all events, you will receive a response as soon as possible, and in all cases within one month of your request being received, unless there are specific circumstances making this impossible, in which case you will be informed.