

General privacy statement of the VUB Report It Helpline for transgressive behaviour

The Report It Helpline for transgressive behaviour is there for everyone on VUB campuses: all students, staff and visitors to the campus can get in touch with the Helpline with their stories, experiences or questions about transgressive behaviour within the VUB context. A VUB staff member bound by professional secrecy and with a mandate as an independent counsellor will provide you with support and information on possible further steps.

As soon as you contact the Helpline for transgressive behaviour, we receive information about you. We always handle that information with care. The Helpline attaches great importance to the privacy and protection of personal data of those who report to it and other interested parties. All personal data handled by the staff of the Report It Helpline for transgressive behaviour, regardless of the support provided, complies with Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation - GDPR) as well as with the Belgian Law of 30 July 2018 on the protection of natural persons with regard to the processing of personal data.

We want to be transparent about why we collect personal data, what is done with it and what the rights of these data subjects are with regard to the processing of their personal data. If you have any questions about this, please contact us.

Who is the data controller?

Legally, Vrije Universiteit Brussel, Pleinlaan 2, 1050 Ixelles, CBE 0449.012.406, represented by its rector, is responsible for the processing of personal data. VUB has appointed a Data Protection Officer (DPO) to assist it in keeping an eye on the many personal data processing operations that take place at VUB. Our data protection officer is registered with the Data Protection Authority ('DPA') and ensures that any processing of personal data by VUB takes place in accordance with VUB's privacy policy and the applicable privacy legislation. More information on VUB's privacy policy can be found at [Privacy Policy VUB | Vrije Universiteit Brussel](#).

In practice, personal data collected within the context of the Report It Helpline for transgressive behaviour is only processed by staff of the Helpline, who guarantee confidentiality.

The personal data processed by the VUB Report It Helpline

According to the General Data Protection Regulation (GDPR), 'personal data' means 'any information relating to an identified or identifiable natural person'. This could be a name, age or address, but also, where appropriate, a (combination of) email address, IP address, installed cookies, data on lifestyle habits, religious beliefs, etc. By 'processing' of this type of data, this Regulation means virtually any act relating to it, such as storing, consulting or using it.

The Helpline is responsible for processing the data of those who contact it. When a report is made, the helpline processes personal data of the following categories of natural persons:

- The persons reporting;
- The persons about whom a report is made;
- The persons identified in connection with the report;
- The persons handling the report.

In doing so, the following personal data may be processed:

- Identification data;

- Contact details;
- Personal characteristics;
- Information about education and training, occupation and job;
- Other necessary data required to realize the objective of the helpline such as:
 - o Nature of the report;
 - o Subject of the report;
 - o Description of the report and circumstantial facts and opinions;
 - o The actions taken (e.g. contact with third parties, referral, ...)
 - o The final action taken on the report.

Why does the VUB Report It Helpline process this personal data?

The Decree on Transgressive Behavior in Higher Education of December 8, 2023, states that a central register will be maintained for each institution in which all reports of transgressive behavior made to the institution's helpline, the confidential counsellor for students and the confidential counsellor for staff as referred to in the Act of August 4, 1996 on the welfare of employees in the performance of their work will be registered. The purpose of this central register is to collect all reports made within the institution in one digital place. This should enable the institution to gain a better overview of reports with common characteristics, to follow up these reports better and more accurately, and to devise and implement appropriate measures in respect of the individuals concerned more quickly and effectively. It also allows institutions to organize quality control and follow-up on what happens to the reports.

The processing is also necessary to pursue a legitimate interest (Article 6.1 GDPR), both of VUB as an organisation, of the VUB community and of yourself as someone who contacts the Helpline. The legitimate interest of VUB and its community lies in ensuring a safe and pleasant university campus environment. Of course, you yourself also have an interest in being able to come forward with reports and in our being able to take action accordingly. The processing of personal data is used to follow up on the report as effectively as possible. The handling of this data or that of other persons linked to the report allows us to identify transgressive behaviour and perform a signalling function with regard to policy. Anonymous statistics are also compiled and published annually for this purpose. Data is not shared with third parties and is stored securely.

The Helpline also processes data of individuals who are the subject of the report. This processing also takes place on the basis of legitimate interest.

Retention period

The Helpline ensures that data is stored securely and that it is not kept longer than necessary to achieve its purposes. The helpline, in accordance with the Decree on Transgressive Behavior in Higher Education of December 8, 2023, retains the statements of facts entered in the register for five years if the parties involved are all students, 10 years if a staff member is a party involved, 30 years if the report concerns criminal offences, in each case from the day on which the staff member or student had these statements recorded. If a new report is made concerning a data subject previously listed in the register, the retention period of the original statement is brought into line with the new retention period. If you want the Helpline to stop storing your personal data or if you would like more information about the retention periods used by the Helpline, you can contact the Helpline for this purpose.

Transfer of data

Your (personal) data is considered highly sensitive and confidential. Under no circumstances will it be passed on to third parties.

VUB ensures that your data can only be accessed by staff of the Helpline itself. Care will also be taken to keep reports from current or future Helpline staff in the event that a report relates to any of those staff members themselves. When a member of the Helpline staff quits, appropriate measures are taken to shield any reports relating to future staff before a handover occurs.

However, if VUB becomes the subject of an acquisition or merger, your data may be transferred to the resulting entity.

Data subjects' rights in relation to their personal data

On 25 May 2018, the General Data Protection Regulation ('GDPR') came into force – a European regulation that gives individuals far-reaching rights regarding personal data and data protection. For example, individuals have the following rights, where applicable:

- Right to information,
- Right to inspection,
- Right to correction,
- Right to object,
- Right to data portability,
- Right to limitation,
- Right to be forgotten,
- Right to file a complaint.

The Report It Helpline specifies that certain rights are restricted, such as the right to inspection, restriction, objection and deletion, especially for individuals who are the subject of a report. These restrictions are necessary to safeguard the rights of third parties and maintain professional secrecy.

For further questions or complaints about the various privacy rights and obligations, please contact VUB's Data Protection Officer at dpo@vub.be.

You can also file a complaint at any time with the Data Protection Authority, the authority that monitors compliance with all privacy legislation:

Data protection authority (DPA)

Drukpersstraat 35, 1000 Brussels

Tel.: +32 2 274 48 00

Email: contact@apd-gba.be

Website: www.gegevensbeschermingsautoriteit.be / www.dataprotectionauthority.be