

## **United World College Red Cross Nordic Privacy Policy**

United World College Red Cross Nordic (UWCRCN) is committed to safeguarding your privacy. By studying at UWCRCN you consent to the Processing of your Personal Data as described in this Privacy Statement.

Contact us at [info@uwcrn.no](mailto:info@uwcrn.no) if you have any questions or problems regarding the use of your Personal Data and we will gladly assist you.

### Definitions used in this Statement

- Personal Data – any information relating to an identified or identifiable natural person.
- Processing – any operation or set of operations which is performed on Personal Data or on sets of Personal Data.
- Data subject – a natural person who's Personal Data is being processed. In this statement, a student.
- We/us (either capitalised or not) – UWC Red Cross Nordic

### Data Protection Principles

We promise to follow the following data protection principles:

- Processing is lawful, fair and transparent. Our Processing activities have lawful grounds. We always consider your rights before processing Personal Data. We will provide you information regarding processing upon request.
- Processing is limited to the purpose. Our Processing activities fit the purpose for which Personal Data was gathered.
- Processing is done with minimal data. We only gather and process the minimal amount of Personal Data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

### Data Subject's rights

The Data Subject has the following rights:

- Right to information – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.

- Right to rectification – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- Right to erasure – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- Right to restrict processing – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- Right to object to processing – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- Right to object to automated Processing – meaning you have the right to object to automated Processing, including profiling; and not to be subject to a decision based solely on automated Processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- Right to data portability – you have the right to obtain your Personal Data in a machine- readable format or if it is feasible, as a direct transfer from one Processor to another.
- Right to lodge a complaint – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled, please contact us.
- Right for the help of supervisory authority – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- Right to withdraw consent – you have the right to withdraw any given consent for Processing of your Personal Data.

You may access your data, rectify it, request its erasure, object to processing on legitimate grounds relating to your particular situation and exercise your right to data portability, at any time by emailing your request along with proof of your identity to our Personal Data Protection Officer at: [info@uwcrn.no](mailto:info@uwcrn.no)

However, we are not under any obligation to erase the data we need for the purpose for which it was collected, required to ensure compliance with a statutory obligation and/or to confirm, exercise or defend rights before a court of law.

## Data we gather

If you are a student at UWCRN, we collect the following categories of data:

- Identification data: surname, forename, date of birth, place of birth, nationality, sex, residential, postal and email address, telephone numbers, Identification numbers, pictures, parent/guardian information etc.
- Billing and/or payment data: bank account details, methods of payment, bills, etc.
- Medical and health data: allergies, medical conditions, health record, learning needs.
- Academic data: School reports, letters of recommendation, language assessments, etc.
- Financial data: Family financial records
- User data: communications, documents generated and communicated to/for you.

- Core data: data that is essential for the educational program.

## How we use your Personal Data

We use your Personal Data on legitimate grounds and/or with your Consent.

We use your Personal Data in order to:

- To identify you.
- Ensure the correct operations of the college.
- To provide you/educational program partners with necessary information and service with regards to the completion of the program taking place at UWCRCN.
- To communicate with you and/or your parent/guardian for disciplinary, health and accounting/financing reasons.
- To communicate with you and relevant third parties with regards to your progress at the college and in preparing for your future after you leave the college (Universities, other educational programs).
- To communicate more general information about the College and its activities.
- To comply with the Norwegian legal framework.

We process your Personal Data in order to fulfil obligations rising from law and/or use your Personal Data for options provided by law. We reserve the right to anonymise Personal Data gathered and to use any such data. We will use data outside the scope of this Statement only when it is anonymised. We save your billing information and other information gathered about you for five years for accounting purposes or other obligations deriving from law. We might process your Personal Data for additional purposes that are not mentioned here but are compatible with the original purpose for which the data was gathered. For example, we might use anonymised data to run statistics across the group of UWC Colleges. To do this, we will ensure that:

- The link between purposes, context and nature of Personal Data is suitable for further Processing.
- The further Processing would not harm your interests, there would be appropriate safeguarding for Processing.

We will inform you of any further Processing and purposes.

## Who else can access your Personal Data

We do not share your Personal Data without your permission/consent. Personal Data about you is in some cases provided to our trusted partners in order to either make providing the service to you possible or to enhance your customer experience. We share your data with:

Our affiliated partners:

- UWC International – the organisation at the centre of the UWC movement. UWC International Privacy Statement is available [here](#).  
Address: UWC International, 2nd Floor, 17-21 Emerald Street, London WC1N 3QN,  
UK email: [dataprotectionofficer@uwcio.uwc.org](mailto:dataprotectionofficer@uwcio.uwc.org)

- IBO – The International Baccalaureate Organization (IBO) is the provider of our academic program framework.  
[IBO's Privacy Statement is available here](#)  
Address: Route des Morillons 15, 1218 Le Grand-Saconnex, Geneva, Switzerland  
Email: [privacy@ibo.org](mailto:privacy@ibo.org)
- UWC National Committees and selection organisations – the organisations that nominate students for UWCRCN. More information and contact details for National Committees can be found [here](#).

Connected third parties:

- Mailchimp – our newsletter service. Mailchimp's privacy policy is available [here](#).  
Address: 675 Ponce de Leon Ave NE, Suite 5000, Atlanta, GA 30308 USA  
Email: [privacy@mailchimp.com](mailto:privacy@mailchimp.com)
- MS Soft – manages our W4 student database system. MS Soft's Privacy Notice is available by making contact with the college.
- Safeguarding 24 – our safeguarding concern reporting system. Safeguarding 24 Privacy Statement is available [here](#).
- Google Workspace for Education – cloud-based education tools including RCN's email and calendar systems. Google Workspace for Education's privacy statement is available [here](#).
- OpenApply – our admissions and enrolment platform. OpenApply's Privacy Policy is available [here](#).
- EverSign – our Student Contract processing service. EverSign's Privacy Policy is available [here](#).
- Managebac – our student education management system. Managebac Privacy Notice is available [here](#).
- CGM Journal – electronic health record system used by our campus clinic. The CGM Journal Privacy Notice is available [here](#).
- iteam – server service for college IT systems. iteam's Privacy Statement is available [here](#).
- Accountor HAFS (Visma Business) – our college accounting company. Accountor HAFS's privacy policy is available [here](#).

We only work with processing partners who are able to ensure adequate level of protection to your Personal Data. We disclose your Personal Data to third parties or public officials when we are legally obliged to do so. We might disclose your Personal Data to third parties if you have consented to it or if there are other legal grounds for it.

## Contact Information Data Protection Officer

If you have any questions regarding Processing your Personal Data, your rights regarding your Personal Data or this Privacy Statement, contact:

**Ola Hovland**, Data Protection Officer via email at [info@uwcrn.no](mailto:info@uwcrn.no)

Datatilsynet (Norwegian Data Protection Authority)  
P.O. Box 458 Sentrum

NO-0105 Oslo  
[www.datatilsynet.no](http://www.datatilsynet.no)

**Changes to this Privacy Statement**

We reserve the right to make changes to this Privacy Statement.

Haugland/ OH / 10/03/2023