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# To the study boards

Processing of personal data

21. January 2022

## Processing of personal data

Applications for exemptions always contain personally identifiable data and often contain data of a more or less sensitive nature. Students must state the reasons for their application and attach necessary documentation. The University is obliged to process these data with the respect and security that would naturally be expected by applicants submitting data of this type.

Course evaluations often contain personally identifiable data. Course evaluations may contain data that the individual lecturer may find personal. Data about the individual lecturer must be processed with due care and confidentiality by the study board.

### Confidentiality

You have a duty of confidentiality concerning all staff matters relating to individual cases dealt with by the study board or by the administration.

In practice, this means that:

- You are not allowed to discuss individual cases with parties other than study board members and the administrative staff members responsible for preparing the case.
- You are not allowed to disclose data about individual cases to parties other than study board members and the administrative staff members responsible for preparing the case.
- The above also applies to any 'hinterland' in the form of student organisations or departmental managements.

### Processing of (physical or electronic) documents containing personal data

The documents must not be posted in a UCPH group room, but must be sent to the study board members via their UCPH email.

In connection with case preparation and at study board meetings, the members may open and save documents via UCPH webmail on the local drive of their personal computers. The documents must always be permanently deleted from the computer immediately after use.

Printed case documents must be stored and transported securely and without any risk of unauthorised persons acquiring access to them.

If printed documents are stored in an office/room to which unauthorised persons may have access, they must be stored in a locked cabinet or the like.

If printed documents are transported to and from meetings, the documents must not be left unattended at any time.

### Communication in connection with administrative procedures

Study board communication about cases involving personally identifiable data can go through the following channels:

- UCPH email (must not be forwarded to private email addresses)
- Personal conversations (meetings or telephone)

The following must not be used for processing of cases involving personally identifiable data:

- Private email accounts
- Facebook Messenger or similar message services
- UCPH group rooms
- Dropbox
- Absalon
- Text messages

When processing personally identifiable data, you must not import emails to mobile devices, such as your mobile phone, tablet or to your personal computer via an email client (i.e. if you have set up your UCPH email on these devices, you are not allowed to open emails containing personally identifiable data on such a device). Instead, you must use webmail with encrypted data.

Please remember to lock, for example, your computer, mobile phone or tablet with a screen lock to prevent external parties from gaining access to confidential material.

### **Deletion of documents after completed administrative procedure**

You must not keep documents containing personal data once the case has been processed. Therefore, you must delete all documents as soon as possible and no later than 30 days after the case processing has been completed.

- Printouts must be shredded. If you do not have access to a shredder, you can hand your printouts to the student administration.
- All emails related to the case must be permanently deleted. Please note that in many email programs you must empty the deleted emails folder.
- Any documents on local drives must be permanently deleted. Please note that most computer operating systems require you to empty the 'recycle bin'.

### **Best practices when working with cases containing personally identifiable data**

- Never disclose more personal data than absolutely necessary. If a case can be processed without documentation being forwarded, such documentation should be omitted.
- Always use the UCPH student number to identify students. Civil registration numbers should not be used.
- As a study board member, you must not contact or talk to applicants about their case or to teaching staff about the evaluation of their courses unless the study board has specifically appointed you to contact them.
- If, in your day-to-day work, you encounter a student whose application has been or is being processed by the study board, you must not mention, ask about or comment on the case.

### **Further information**

Should doubts arise on the study board about the established practice for the processing of cases, the study board can contact its secretary responsible for handling applications for exemptions.

<https://intranet.ku.dk/medarbejderguide/it/it-sikkerhed/Sider/default.aspx>