

# UNIVERSITEIT TWENTE.

## PRIVACY STATEMENT

[Application Proofpoint]

[Project PASSWORD, Privacy and Security Awareness Training]

# 1 INTRODUCTION

This privacy statement describes how the University of Twente (UT) handles your data within the PASSWORD awareness project. The PASSWORD project provides Privacy and Security Awareness Training and Phishing Simulations using the ProofPoint application.

## 2 PROCESSING OF PERSONAL DATA

Within the PASSWORD project, the following data is processed to conduct further analyses at an aggregated and personal level to make better choices concerning this awareness program.

<b>(Categories) personal data</b>	<b>Those involved</b>	<b>Purpose of the processing</b>	<b>Legal basis</b>	<b>Retention period</b>
<p>The following data is processed in the ProofPoint application:</p> <p>First name Last name E-mail Department</p>	<p>Students Staff</p>	<p>The PASSWORD project aims to increase awareness of safe information handling at UTwente. This is done by offering targeted training and carrying out knowledge measurements (e.g., questionnaires) and behavioural observations (e.g., e-mail phishing simulations). This allows the effect of the training to be calculated, and it can be determined whether awareness has increased within the UT. Risk-based assessments are made based on the results of measurements and observations, and it can be assessed whether the set objective has been achieved.</p> <p>Personal data are necessary for personalising communication on an</p>	<p>Legitimate interest.</p> <p>The UT has a legitimate interest in processing this data. This importance consists of properly securing and protecting UT students, employees, and information (systems). For this to be important, it is necessary to create awareness and maintain knowledge about the safe handling of information (systems) by students and employees. Partly given the ever-increasing digital threat, the UT attaches enormous importance to good security of its information systems and data. This awareness and knowledge are also of personal significance for students and employees.</p> <p>This interest is offset by the rights and freedoms of those involved, the students and employees. The UT is the impact that this processing of personal data has on data subjects is very limited. No unique or sensitive personal data</p>	<p>The personal data will be kept for the duration of the awareness campaign.</p> <p>After the contract period, the data and the project data are deleted from Proofpoint.</p> <p>Participation in training remains in the HR system because of participation evidence in the context of accountability or the responsibility of the UT towards its employees.</p>
<p>The following data is not processed in the ProofPoint application but is used in the PASSWORD project.</p> <p>Date service. Number of Employment. Service unit. Type of contract. Function Manager (email).</p>	<p>Staff</p>	<p>Personal data are necessary for personalising communication on an</p>	<p>This interest is offset by the rights and freedoms of those involved, the students and employees. The UT is the impact that this processing of personal data has on data subjects is very limited. No unique or sensitive personal data</p>	<p>Participation in training remains in the HR system because of participation evidence in the context of accountability or the responsibility of the UT towards its employees.</p>

		<p>individual and aggregated level.</p> <p>In addition, it is recorded which employee has participated in training.</p>	<p>is processed. The data will only be accessible to the project team. This personal data is pseudonymised by replacing the identifying personal data (i.e. e-mail address) with a number. This number and email address are stored separately in a lookup table. The data is stored in a shared folder on the UT ISO 27001 certified data storage facility accessible only to PASSWORD project staff.</p> <p>In addition, the date of participation in the mandatory basic training is recorded at personal level in AFAS-HRM. The Executive Board, deans and service directors periodically receive participation information at an aggregated level, direct managers at personal level. All this to motivate and encourage employees to complete the mandatory training.</p>	
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### 3 OBTAINING PERSONAL DATA

The personal data comes from the Microsoft Active Directory and AFAS. The data from the Microsoft Active Directory is necessary to access the University's IT facilities and to communicate with e-mail. The other data comes from the HR department to implement good personnel management. This is about the way in which the UT deploys, stimulates, and develops its employees to realize its strategy and policy objectives.

### 4 TRANSFER OF PERSONAL DATA

Only the data: first name, last name, email address and faculty/department are synchronized with the ProofPoint platform. This Platform is in Dublin, which is part of the EU. The other data is stored in an ISO27001-certified data storage facility owned and managed by the University of Twente.

### 5 YOUR RIGHTS

The UT processes your personal data, but you, as a data subject, have various rights to maintain control over your personal data. Below, you will find more information about these rights. For more information and the option to submit a request, please visit [this website](#).

#### 5.1 Right of access

You have the right, among other things, to receive a copy of the personal data that is processed about you.

**5.2 Right to erasure**

This is the right to be 'forgotten'. It is not always possible to delete all personal data. Participation data (date of completion of the training) is stored in AFAS in the context of accountability, or the responsibility of the UT to its employees to provide them with sufficient knowledge regarding the careful handling of data and ICT services.

**5.3 Right to rectification and addition**

This concerns the right to have personal data changed.

**5.4 Right to data portability**

This is the right to have personal data transferred to another party.

**5.5 Right to restriction of processing**

This is the right to have less data processed.

**5.6 Rights regarding automated decision-making and profiling**

The data can be used to offer personalized privacy and awareness modules to students and employees.

**5.7 Right to object**

In certain situations, you have the right to object to data processing.

## 6 COMPLAINTS

Do you have a complaint about the processing of your personal data? Then you can file a complaint with the Dutch Data Protection Authority.

## 7 CONTACT DETAILS

For specific questions about the PASSWORD and ProofPoint project, you can contact the project team at [awareness@utwente.nl](mailto:awareness@utwente.nl).

For questions about privacy, please contact the privacy contact person of your faculty or service. See <https://www.utwente.nl/en/cyber-safety/contact/#privacy-contact-persons>.

You can also contact the Data Protection Officer via [fg@utwente.nl](mailto:fg@utwente.nl).