

WSKOV privacy statement

This privacy statement also serves as a data protection policy and a register of processing activities.

The privacy statement aims to comply with the accountability obligation of the six principles as set out in [Article 5 of the General Data Protection Regulation \(GDPR\)](#).

The Data Protection Policy aims to provide information on how WSKOV complies with the GDPR, as set out in [Article 24 of the GDPR](#).

The purpose of the register of processing activities is to comply with [Article 30 of the GDPR](#). For WSKOV, drawing up a register of processing activities is mandatory, given that the data processing is structural.

This is the English translation of the WSKOV privacy statement. In case of discrepancies in content, the Dutch version is leading.

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A brief introduction

This way, you know whether WSKOV is correctly relying on the GDPR and you are aware of your rights.

The six principles of the GDPR

- **Lawfulness, fairness and transparency;**
 - a. The processing must be based on a legal basis under the GDPR.
 - b. The processing must not be adverse, discriminatory, unexpected, or misleading to the data subjects without a justified cause.
 - c. The reason for processing and the manner of processing must be clear to the data subjects.
- **Purpose limitation;**
 - a. WSKOV may only collect personal data for a legitimate purpose that has been specifically and explicitly described in advance.
- **Data minimization;**
 - a. WSKOV remains critical of the amount of personal data required to continue functioning. The guiding principle here is as little as possible.
- **Accuracy;**
 - a. WSKOV endeavours to keep personal data as up-to-date as possible.
- **Storage limitation;**
 - a. WSKOV deletes personal data that is not necessary for the purpose for which it was originally collected. Personal data may only be retained for a limited period of time.
- **Confidentiality and integrity.**
 - a. WSKOV uses password protection for every form of storage. The passwords are changed at least twice a year.

The six legal bases for processing personal data

WSKOV must rely on one or more of these grounds to be permitted to process your data.

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
2. It is necessary to process data to execute an agreement.
3. It is necessary to process data because there is a legal obligation to do so.
4. It is necessary to process data to protect vital interests.
5. It is necessary to process data to perform a task of public interest or to exercise public authority.
6. It is necessary to process data to pursue the legitimate interest of WSKOV.

Your rights

For all rights, you can reach WSKOV at the email address listed in the contact details. Unless stated otherwise, or not applicable, WSKOV is obliged to respond to your request within one month.

Right to information

Linked to Principles 1 and 2 of the GDPR, you have the right to transparent information before entering into an agreement. WSKOV must make contact details available and inform you of the personal data that

WSKOV processes, why, and which legal basis applies. Furthermore, WSKOV must inform you if it resells data to other organizations and, if so, to which organizations. Finally, WSKOV is obliged to state how long the data will be retained. Exceptions apply. For more information, please visit the website of the [Dutch Data Protection Authority – right to information](#).

Right of access

You always have the right to view which personal data of yours is known to WSKOV. For more information, you can visit the website of the Dutch [Data Protection Authority – right of access](#).

Right to rectification

If your data is incomplete or incorrect, you can request a rectification. For more information, please visit the website of the [Dutch Data Protection Authority – right to rectification](#).

Right to erasure

If there is no valid reason to process your personal data, you can send WSKOV a request for data erasure. For more information, please visit the website of the [Dutch Data Protection Authority – right to erasure](#).

Right to restriction of processing

In certain situations, you can ask WSKOV to temporarily stop the processing of your personal data. For more information, please visit the website of the [Dutch Data Protection Authority – right to restriction of processing](#).

Right to data portability

The right of data portability does not apply to the services provided by WSKOV. It requires an unreasonable effort on the part of WSKOV, and the personal data that WSKOV holds about you is provided directly by you to WSKOV. For more information, please visit the website of the [Dutch Data Protection Authority – right to data portability](#).

Right to object

In specific situations and in the case of direct marketing, you may object to the use of your personal data. At WSKOV, direct marketing does not apply, as we will never use your postal address to send advertising. For more information, please visit the website of the [Dutch Data Protection Authority – right of objection](#).

Right to a human intervention in decision-making processes

You have the right to a human review of automated decisions that have legal consequences or other serious consequences for you. WSKOV does not make automated decisions, so appeals to this right will remain minimal. For more information, please visit the website of the [Dutch Data Protection Authority – right to a human review of decisions](#).

Right to withdraw granted consent

Withdrawing consent must be just as easy as giving consent. You can withdraw consent at any time by contacting WSKOV. For more information, please visit the website of the [Dutch Data Protection Authority – legal basis for consent](#).

General affairs

Security

WSKOV has taken appropriate technical and organizational measures to protect personal data against unlawful processing. An example of the measures:

1. WSKOV uses a username and password on all systems;
2. Where applicable, WSKOV uses pseudonyms and encryption of personal data;
3. WSKOV makes backups of personal data and more to be able to restore it in the event of a technical error;
4. WSKOV regularly tests and evaluates the measures taken to protect personal data;
5. Members of the association are required to process personal data in accordance with this privacy statement and the GDPR.
6. WSKOV makes this privacy statement accessible on the website.

Outside the European Economic Area (EEA)

See [the central government](#) for an overview of the countries belonging to the EEA. As stated in [Provision 101 of the GDPR](#), the GDPR continues to apply to personal data of natural persons established in the EEA, even if the data ends up with third parties established outside the EEA.

For sending digital correspondence and financial administration, WSKOV may use companies established outside the EEA. WSKOV strives to find options within the EEA as much as possible.

Contact and complaints

The Wageningen Student Choir and Orchestra Association is based in Wageningen. The postal address is available upon request. Questions can be directed to the association's secretary, who can be reached at wskov@wur.nl and is by far the most familiar with the processing of personal data.

If you have a complaint about the processing of personal data, you can contact WSKOV. Should you be unable to resolve the matter together with WSKOV, you can file a complaint with the [Dutch Data Protection Authority – submit a tip or complaint to the AP](#).

Data Protection Officer

As stated in [Article 37 of the GDPR](#), a Data Protection Officer must be appointed in specific cases. WSKOV does not process special categories of personal data on a large scale as a core activity, nor does it process criminal personal data. Furthermore, we do not map the activities of natural persons on a large scale, nor do we profile natural persons. Finally, we are not a government agency or public organization. In the Netherlands, no additional situations have been designated in which the appointment of a Data Protection Officer is mandatory¹; therefore, WSKOV is not obliged to appoint a Data Protection Officer.

¹ Source: <https://www.autoriteitpersoonsgegevens.nl/en/the-dpo-in-your-organisation>

Sharing of data with third parties

It is prohibited for anyone to share personal data of parties mentioned in this statement with parties other than the main suppliers of our digital services, unless explicit consent has been obtained from the persons in question prior to sharing. This consent is valid only once.

It is therefore also prohibited to share this data with a generative AI models such as ChatGPT, Claude, Mistral, Gemini, et cetera.

Processing of personal data of association members

Association members are natural persons who hold a valid membership agreement for the current season. Personal data in this category is processed by WSKOV for the following purposes:

- Administration;
- Executing the membership agreement.
The membership agreement cannot be executed if the personal data is not provided. No provision of personal data means termination of the membership.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This consent has been granted by completing and signing a membership agreement.
2. It is necessary to process data to execute an agreement.
 - a. The data is required to make a natural person a member of the association and to carry out the administration.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Address, including city and country;
- Phone number;
- Email address;
- Study status;
- Instrument or voice group;
- A photo in which you are recognizable;
- Signature;
- IBAN or other payment details.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- For the duration of the agreement and thereafter, only first and last name, address, email address, signature, and IBAN or other payment details in the financial records for a maximum of seven years.
- See [Processing of personal data of former members](#) for more information.

Processing of personal data of former members

Former members are natural persons who have in the past held a valid membership agreement. Personal data in this category is processed by WSKOV for the following purposes:

- Administration;
- Contact with former members, in the form of, among other things, a newsletter with invitations to the concerts, tours, and anniversaries of WSKOV.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This permission was granted upon termination of the membership agreement. The secretary of the association asks the departing member whether they wish to be included on the list of former members.
2. It is necessary to process data to execute an agreement.
 - a. The data is needed to get in touch with the former members.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Email address;
- Membership period;
- Instrument or voice group;
- Board or committee position.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- Until withdrawal of consent by the relevant former member, or anyone authorized on their behalf. WSKOV is legally obliged to retain financial data for 7 years after termination, if applicable.

Processing of personal data of potential members

Potential members are natural persons who have shown interest in becoming a member of WSKOV by registration on an interest list or contact list for auditions. Personal data in this category is processed by WSKOV for the following purposes:

- Inform about possibilities to become a member of WSKOV.
- Contact to supplement the WSKOV occupation.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This permission was granted upon registration on an interest list or contact list for auditions.
2. It is necessary to process data to pursue the legitimate interest of WSKOV.
 - a. WSKOV aims to make music. It is in WSKOV's interest to have an appropriate occupation for this.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Phone number;
- Email address;
- Instrument or voice group.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- From the moment of registration on an interest list until potential member is informed about the possibilities of becoming a member.
- From the moment of registration on a contact list for auditions until the audition has taken place.

Processing of personal data of users of the rehearsal rooms

Users of the rehearsal rooms are also known as hall users. They are all natural persons or representatives of a group of natural persons and have an agreement with WSKOV for the use of a rehearsal room with a piano. Personal data in this category is processed by WSKOV for the following purposes:

- Administration;
- Implementing a room user agreement.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. A user of the rehearsal room gives consent for the processing of the data as soon as they register.
2. It is necessary to process data to execute an agreement.
 - a. The data is needed to create a room user pass and to verify that the spaces are not being misused.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Phone number;
- Email address;
- Study status;
- Whether you act alone or as a representative of a group;
- A photo in which you are recognizable;
- Signature;
- IBAN or other payment details.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- For the duration of the agreement. WSKOV is legally obliged to retain financial data for 7 years after termination, if applicable.

Processing of personal data of benefactors

Donors are natural persons or legal entities who make a voluntary (financial) contribution to the association. Personal data in this category is processed by WSKOV for the following purposes:

- Administration;
- Informing.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This consent has been granted by completing and signing a donor form.
2. It is necessary to process data to execute an agreement.
 - a. The data is required to register a donor and reap the benefits of the donor membership.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Address, including city and country;
- Phone number;
- Email address;
- Signature;
- IBAN or other payment details.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- During the term of the agreement and thereafter only in the financial records for a maximum of seven years. The agreement expires automatically if no contribution has been received by WSKOV for more than 365 days.

Processing of personal data of conductors and tutors

Conductors and tutors are natural persons or legal entities who have signed an agreement with WSKOV for the purpose of leading one or more rehearsals. Personal data in this category is processed by WSKOV for the following purposes:

- Administration.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This permission is granted by completing and signing a rehearsal agreement or conductor contract.
2. It is necessary to process data to execute an agreement.
 - a. The data is required to draw up an agreement or contract, to carry out the administration, and to process payments.
3. It is necessary to process data to pursue the legitimate interest of WSKOV.
 - a. WSKOV aims to make music. It is in WSKOV's interest to receive appropriate guidance in doing so.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Address, including city and country;
- Chamber of Commerce number;
- Phone number;
- Email address;
- Previous experience and studies;
- Signature;
- Salary;
- IBAN or other payment details.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- For the duration of the agreement and thereafter only in the financial records for a maximum of seven years.
- If permission has been given to that effect, contact details will be retained longer so that WSKOV can contact the conductor or rehearsal director in the future to lead a rehearsal, concert, or other project.

Processing of personal data of guest players and soloists

Guest players and soloists are natural persons who have an agreement with WSKOV for the purpose of supplementing the occupation of WSKOV. Furthermore, WSKOV maintains a list of natural persons who have fulfilled such a role in the past. Personal data in this category is processed by WSKOV for the following purposes:

- Administration;
- Contact to supplement the WSKOV occupation.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This permission is granted by completing and signing a guest player or soloist agreement.
2. It is necessary to process data to execute an agreement.
 - a. The data is required to draw up an agreement or contract, to carry out the administration, and to process payments.
3. It is necessary to process data to pursue the legitimate interest of WSKOV.
 - a. WSKOV aims to make music. It is in WSKOV's interest to have an appropriate occupation for this.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Address, including city and country;
- Chamber of Commerce number;
- Phone number;
- Email address;
- Previous experience and studies;
- Signature;
- Amount of the compensation for the agreement;
- IBAN or other payment details.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- For the duration of the agreement.
- The data will be retained for up to five years after the termination of the agreement in a summary containing only name, contact details, and instrument or voice group.
- The data will be retained in the financial records for up to seven years after the termination of the agreement.

Processing of personal data from the internal archives

The internal archives are only visible to association members and former members. Examples include meeting minutes and emails. This is important data for gaining insights into the functioning of the association in the past and Section XIII of the Bylaws mandate the use of minutes. Minutes requested by persons outside the board are provided as free of personal data as possible. Personal data in this category is processed by WSKOV for the following purposes:

- Administration.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This consent has been granted by completing and signing a membership agreement.
2. It is necessary to process data to execute an agreement.
 - a. The data is needed to carry out the administration.
3. It is necessary to process data to pursue the legitimate interest of WSKOV.
 - a. WSKOV aims to make music. It is in WSKOV's interest to have context and decision-making from the past at its disposal.

For the above objectives, WSKOV may request the following personal data from you:

- First and last name;
- Expressions.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- Personal data in the internal administrative archives is stored indefinitely.
- Personal data in the internal committee archives is stored for a maximum of seven years.

Processing of visual material

Visual material includes photos and videos. Only a select amount of visual material is publicly available; the vast majority is visible only to (former) association members. Visual material is predominantly created during rehearsals and concerts. For rehearsals, you will be informed of this before the start of the recording. For concerts, you are deemed to agree to the recording upon purchasing or receiving a concert ticket. Personal data in this category is processed by WSKOV for the following purposes:

- Informing;
- Archiving;
- Promotion.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This consent is recorded in the membership agreement or granted with the purchase of a concert ticket. Consent is also granted by signing an agreement with the association in which your attendance at a concert is expected. If you pass on a concert ticket to another person, you must actively inform them of the existence of this privacy statement.
2. It is necessary to process data to pursue the legitimate interest of WSKOV.
 - a. WSKOV aims to make music. It is in WSKOV's interest to recruit new members for the continued existence of the association, among other things by sharing visual material of the concerts.

For the above objectives, WSKOV may request the following personal data from you:

- Visual material in which you may be recognizable.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- Image material is stored indefinitely. You always have the right to withdraw your consent. See also [Right to erasure](#).

Processing of sensitive personal data

This category includes data that reveal a great deal about a person, such as ethnicity, political views, health, or sexual behavior. For more information, see [Dutch Data Protection Authority – Sensitive personal data](#). Personal data in this category is processed by WSKOV for the following purposes:

- Guaranteeing the health of participants in a WSKOV activity.

Think of a rehearsal weekend, a tour, or a reunion.

The basis for processing the personal data is:

1. WSKOV has the consent of the persons concerned. If the persons concerned are under the age of 16, WSKOV requests consent from the parents or guardians of the persons concerned.
 - a. This consent is granted by registering for the activity.
2. It is necessary to process data to protect vital interests.
 - a. Certain data is necessary to guarantee the health of participants in an activity.

For the above objectives, WSKOV may request the following personal data from you:

- Allergies;
- Dietary restrictions;
- Medical information.

Your personal data is stored by WSKOV for the purpose of the above-mentioned processing for the period:

- From the moment of registration for the excursion up to and including the day after the excursion.

Other cases

Any case that is not foreseen by this privacy policy, the respective foundations and objectives are explicated and permission is requested.