



# UvA Circlelytics privacy statement

Date: 21 October 2021

Privacy is a very important issue for the University of Amsterdam (UvA), so the UvA handles your personal data with great care. This Privacy Statement describes how your personal data are processed and protected **when using Circlelytics**.

Circlelytics is an instrument that allows large groups of employees to be involved in the development of UvA policy. They engage in online discussions about questions or propositions concerning a specific theme for the UvA. Circlelytics creates analyses based on the input the employee enters in the application, including answers and employee data. The UvA uses the Circlelytics analyses to develop HR policy. Each dialogue lasts two weeks, after which Circlelytics analyses the input. The results are provided to the UvA on an aggregate level, so they cannot be traced back to individuals. No participant in the dialogue can see or trace anyone else's contribution, evaluation or score. However, all participants can see the answers. It is advisable to keep the visibility of the open text fields into account.

## 1. Who is responsible for processing my personal data?

The UvA is responsible for processing your personal data in accordance with the General Data Protection Regulation. The UvA's address is Spui 21, 1012 WX Amsterdam. The postal address is PO Box 19268, 1000 WX Amsterdam. Any questions you may have about the processing of your personal data can be sent to [avg@uva.nl](mailto:avg@uva.nl). The UvA has appointed a Data Protection Officer who can be contacted at [fg@uva.nl](mailto:fg@uva.nl).

## 2. What personal data of mine will be processed?

Participation in a digital dialogue **through Circlelytics** implies that the email address and IP address are processed by Circlelytics only insofar as is strictly necessary. The UvA provides email addresses linked to some personal data that are relevant for analysis by Circlelytics. Immediately upon receipt, Circlelytics pseudonymises these data so they can no longer be traced to individuals. The following data of UvA employees may be processed:

- Employee input (the employee can modify this during the dialogue)
- Unit
- Job category
- Sex
- Age category
- Years of service

## 3. For what purposes are your personal data processed?

Circlelytics uses these data to distinguish between the responses of different groups of employees when analysing dialogue, thus lending added significance to the responses. The result of the analysis is used to develop and monitor UvA policy.

#### **4. What is the basis for this processing?**

The UvA processes your personal data on the basis of legitimate interest in the context of good employer practices.

#### **5. Will my personal data be shared with third parties?**

The UvA exclusively shares your personal data with Circlelytics for the purposes described under 3. Circlelytics is a research agency that facilitates and analyses digital dialogues on behalf of the UvA. The results of this analysis are provided to the UvA on an aggregate level. Circlelytics is contractually bound to the Processor Agreement with the UvA, on the basis of which the privacy of employees and the security of data are safeguarded in various ways. This agreement also prohibits the distribution of personal data files.

#### **Are my personal data transferred to countries outside the European Union?**

No, your personal data are not transferred to countries outside the European Union.

#### **How are my personal data protected?**

The UvA takes organisational and technical measures to protect your personal data against unauthorised access, loss and any form of unlawful processing. The following privacy measures are applied:

- pseudonymisation of email addresses. When a dialogue is completed, the email addresses are immediately pseudonymised using an SHA256 hash
- encryption of personal characteristics
- an access control layer
- input from the dialogue is sent to the UvA via an anonymised Circlelytics database

#### **For how long will my personal data be stored?**

We do not keep your personal data longer than necessary for the analysis of the dialogue and never longer than one month. Immediately upon receipt, personal data are pseudonymised by Circlelytics so that they cannot be traced back to individual employees.

#### **What are my privacy rights?**

In accordance with the General Data Protection Regulation, you have the right to review the personal data collected by the UvA, to correct personal data containing factual errors, to have your personal data removed, to restrict the processing of your personal data and – under certain conditions – to object to the processing of your personal data and the right to transferability of your personal data.

If you wish to exercise these rights, please write to [avg@uva.nl](mailto:avg@uva.nl).

If you are not satisfied with the way the UvA processes your personal data, you can submit a complaint to the UvA Data Protection Officer at [fg@uva.nl](mailto:fg@uva.nl).

### **Contact details**

If you have any questions about Circlelytics and the way your personal data are processed, please contact the HR Strategy & Policy department at [p.c.boelsma@uva.nl](mailto:p.c.boelsma@uva.nl).