ABOUT THE SHARING PERSPECTIVES FOUNDATION
The Sharing Perspectives Foundation (SPF) is the Stichting Sharing Perspectives, with registered office at (1054 AN) Amsterdam, the Netherlands listed at the Trade register of the Dutch Chamber of Commerce under 56446799.
Privacy Policy for Erasmus+ Virtual Exchange
For all activities relating to the Erasmus+ Virtual Exchange project in which the Sharing Perspectives Foundation is involved, we handle personal data according to the Erasmus+ Virtual Exchange Privacy Statement of the European Commission.

Click here to view the Erasmus+ Virtual Exchange Privacy Statement.

Privacy Policy | Sharing Perspectives Foundation
This policy refers to all programmes of the Sharing Perspectives Foundation (SPF) and their associated online services such as the Videologue platform. This privacy policy explains to you the way in which we and our system uses personal data, and the way in which the privacy of this data is being protected.

What is the purpose of the data collection?
There are four main features of SPF’s programming which involve the collection and processing of personal data. These are:

Program Evaluation – Assessing the impact of SPF’s programming through pre- and post-program surveys, including quantitative and qualitative survey questions.

Program Setup and Implementation – Allows SPF staff to organize all programme participants into small groups of 8-20 participants and 1-2 facilitators or trainers and ensure program quality.

Communication – Enables different parties to communicate with one another before, during, and after programme participation.

Videologue platform – Provides a space for participants, facilitators and trainers to share videos with each other.

Users will be asked to login to the Videologue platform and authenticate themselves before being able to use the features of the platform.

The purposes of the data collection are:

Program Evaluation – data collected in the evaluation surveys and session notes provide feedback to SPF on the impact and quality of our programming. Through answers to quantitative and qualitative survey questions, we are able to assess whether our programmes meet their goals, and measure the impact that we have on skills, attitudes and opinions.

Program Setup and Implementation – data collected for programme setup purposes allow SPF’s staff to create programme groups. Schedule data provides the basis for meeting times for each group, and demographic data ensures that the groups of 8-20 participants are diverse and
balanced.

**Communication** – data collected for communication purposes allows the opening of communication channels that are needed before, during, or after programme participation. Specifically:

- Enables facilitators to reach their co-facilitator if applicable, the student participants in their groups, and their facilitation coaches.
- Enables facilitation coaches to reach the facilitators whom they are mentoring.
- Enables programme student participants to reach their groups’ facilitators.
- Enables program trainers to reach the trainees in their groups, and trainees to reach one another and their trainers.
- Enables participating professors to reach other participating professors.
- Enables SPF staff members and (external) tech support to reach programme student participants, facilitators, coaches, and professors, as well as trainees and trainers, as well as alumni of programmes and all other past or future programmes.
- Enables SPF staff members to send end-of-semester participation certificates and badges to student participants, facilitation trainees, facilitators, coaches, and trainers.

**Videologue Platform** – data collected for the Videologue platform purposes enables us to create participant profiles and allows all users of the platform to view basic demographic information about one another and exchange videos with each other.

**What personal data do we collect?**

**Program Evaluation** – For the collection of program evaluation we use email addresses and collect IP addresses. Data collected to allow for more refined analysis is gender, nationality, regional location and university or partner institution. All programme evaluation data is anonymised before it is processed.

**Program Setup and Implementation** – Required data collected: first name, last name, email address, phone number, date of birth, gender, nationality, university (if applicable), region of origin, access to high speed internet at home, and schedule availability for programme durations. Facilitation trainees, facilitators, coaches and trainers are also required to provide their current residence, country of origin, languages spoken and skype account.

**Communication** – Required data collected: username, email address, and phone number. Optional data that you can choose not to provide: alternate email address. Programme facilitators and trainers and trainees are required to provide their Skype usernames, CV, and cover letter.

**Videologue platform** – Required data collected: username, password, first name, last name, e-mail address, nationality, date of birth and gender. Optional data that you can choose not to provide: profile picture.
The platform collects essential cookies for security purposes, including IP address, browser type, device type and location.

**Which technical means do we use for processing your data?**

- Data collected for Evaluation is collected and stored on the ExchangePortal. Before this data is processed, the data is anonymised.
- All data collected for Programme Setup and Implementation and Communication is collected and stored using the Exchange Portal, Google services, including Gsuite, Gmail, Drive, Sheets, Docs, Forms. Additional services are used such as Mailchimp for communication purposes.
- Data collected for the Videologue platform is collected and processed on a dedicated vps server running on Ubuntu. The software consists of the PHP framework Drupal 8 connected to a MySQL database. The data is input and output is visualized using a React frontend. All connections are secured with SSL. The server is located in an Amsterdam based server center.
- Video data is transcoded via the Amazon S3 platform. The data transfer is secured via SSL and data is deleted after being transcoded from the Amazon server.
- Management access and data transfers are done via SSH.
- Backups of data are taken on a daily basis onsite.
- The development environment is separated from production: access to the development environment does not grant access to the production environment or user data.

**Who has access to your information and to whom is it disclosed?**

**Program Evaluation** – Data collected for program evaluation is anonymised before processing and accessible by SPF staff members as well as evaluation partners. Aggregated data by university, country, region, or for the entire program is available to the public.

**Program Setup and Implementation** – Data collected for the program setup is accessible to SPF staff members and external programme tech support as well as fellow participants in the programme.

**Communication** – Contact information is accessed by SPF staff and external tech support team. Names and email addresses of programme participants are also available to facilitators, names and email addresses of facilitators are available to coaches, and names and email addresses of trainees are accessible by trainers.

**Videologue platform** – Data collected for this purpose is accessible to members of your exchange group, including facilitators, trainers and SPF staff who login to the Videologue platform. Online profiles do not include any contact information.

SPF assumes liability for the improper processing of user data by staff and third party agents.
acting on SPF’s behalf, unless the event giving rise to the damage is outside of the organisation’s control.

**How long do we keep your data?**

Data is retained for a 2-year period, after which a request for consent to remain in SPF’s records will be sent to all users. Participants can choose to change or delete your information on the Exchange Portal.

Participants can at any moment request to have your account removed and any or all your personal data deleted. If you wish to have your account removed and/or your personal data deleted, please email dataprotection@sharingperspectivesfoundation.com.

**How can you access your personal data, verify its accuracy and, if necessary, correct it?**

You can view and make modifications to your profile at any time by going to www.videologue.eu, logging in with your username and password, clicking on your profile, and selecting ‘Edit’. You can also email dataprotection@sharingperspectivesfoundation.com to request your personal data is corrected or ask for it to be deleted. If a request to be forgotten is made, the user’s data will be deleted from SPF’s implementation-related contact lists, global contact lists for newsletters, and SPF’s servers where your information is hosted.

**What are the security measures taken to safeguard your information against possible misuse or unauthorized access?**

SPF uses IT industry standards to secure our technology stack, including all our users’ personal data. Our data and services are hosted on Google servers and TransIp servers which is an Amsterdam based server centre. Both servers are GDPR ready.

Data in transit is encrypted via SSL. Management access and data transfers are done via SSH. Backups of data are taken on a daily basis onsite. The development environment is separated from production. Access to the development environment does not grant access to the production environment or user data.

Firewalls and security groups are enabled on all of our instances, and secure management ports are enabled.

All contractors who require access to the technology stack must sign SPF’s NDA.
Whom to contact if you have queries or complaints about data protection?
You should contact dataprotection@sharingperspectivesfoundation.com.

**Recourse:** In case of conflict, complaints can be addressed to the European Data Protection Supervisor (EDPS) http://www.edps.europa.eu.

Under certain conditions, users can invoke binding arbitration to resolve complaints.

SPF commits to cooperate with EU data protection authorities (DPAs) and comply with the advice given by such authorities with regard to data transferred from the EU.