

02-05-2022

Privacy statement

We are glad that you're reading the privacy statement of Delft University of Technology for the service Edubadges! We have paid a lot of attention to the protection of your personal data, and you can read all about it in this privacy statement. If you have any questions, comments or concerns after reading this privacy statement, please contact privacy-tud@tudelft.nl.

1 Introduction

An Edubadge is a digital badge (image) which shows that the holder has certain knowledge or skills. The recipient of an Edubadge can share it with others, for example on social media, on a digital CV, or with an educational institution or (potential) employer.

A technical infrastructure is required in order to create and award Edubadges. SURF has developed the infrastructure for issuing Edubadges and the Edubadges are stored securely and can be validated within SURF's systems. More information about Edubadges can be found on [SURF's website](#).

2 Purpose and processing

TU Delft uses Edubadges to issue Microcredentials. Microcredentials add a quality mark to small sized educational units. This enables professionals and other participants to visualize achieved results and the level of education, which supports further flexibilization of the education.

The Edubadges service is divided into two parts:

- * Account/backpack (1):
 - * Creating and maintaining an account
 - * Storing Edubadges in the backpack
 - * Validating Edubadges
- * Issuing an Edubadges (2):

- * Registering for Edubadges
- * Creating an Edubadge
- * Issuing an Edubadge

For the account/backpack (1), SURF is the controller. See the [privacy statement of Edubadges.nl](#) for more information. You can contact support@edubadges.nl with questions. For issuing Edubadges (2), Delft University of Technology is the controller and SURF is the processor. This privacy statement relates primarily to the processing by Delft University of Technology.

3 Personal data

For issuing Edubadges, there are three forms of processing:

1. Registering for an Edubadge
2. Creating the Edubadge
3. Sending the Edubadge

In the table below are the personal data (with purpose and basis) that are processed when registering for an Edubadge, when the Edubadge is created and when the Edubadge is send to the recipient. This person al data is obtained by linking to the user his/her EduID account.

Personal data	Purpose	Basis
eduID	Pseudonym identifier in edubadge	Public interest
Given name(s)	User identification	Public interest
Surname	User identification	Public interest
Email address	User Notification	Public interest
Educational institution	Demarcation of available edubadges	Public interest
Unique identifier	Make it possible to award edubadges directly to the student	Public interest
Privacy interaction	Whether the privacy statement has been read	Public interest

Delft University of Technology has access to your first name, last name and email address. SURF and its management partner has access to all personal data. The personal data are not provided to other parties.

4 Security

Security measures, including the following, have been taken to protect personal data:

- * Only the personal data associated with the EduID is stored in the Edubadge.
- * Communication between systems is encrypted in accordance with the state of the art and best practices.
- * An extensive independent security audit (code review and penetration testing) took place before the systems went live.
- * The Edubadges service will be audited regularly.
- * Access to servers is secured in accordance with the state of the art in security technology, standards and best practices.
- * All physical and virtual servers and data are located in SURF's data centres in the Netherlands. The Edubadges service is hosted redundantly at SURF's Nikhef and InterXion locations.
- * All operating systems and software are kept up-to-date.
- * Access to the administration side of the Edubadges service is shielded by VPN and a hardened configuration for the access itself.
- * Backups of the production environment are made daily.
- * Servers, operating systems and applications are protected by a restrictive firewall.
- * Actions in the operating system and actions taken to issue Edubadges are all logged.
- * The web server uses a hardened configuration and security headers in accordance with best practices.
- * Employee account roles access in Edubadges is limited to only the personal data that is relevant to them.

5 Your personal data rights

You have the following rights with regard to your own personal data:

- * You may submit a request to modify, supplement or delete your data if it is incorrect or no longer relevant.
- * You may submit a request to access the data about you that we process.
- * You may object to the processing of your data if we process your data on the legal basis of a legitimate interest or the performance of a task in the public interest.
- * You may submit a request to limit the processing of your data in relation to the processing of data which you have objected to, which you consider to be unlawful, whose accuracy you have disputed, or where we no longer need the personal data, but you need it in the context of legal action.
- * You may request an export of the data we process on you, in a structured and common format, and you have the right to portability of this data to another service provider.

* If you believe that we have not handled your personal data properly, you may submit a complaint.

However, if you and Delft University of Technology disagree and the response to your complaint does not lead to an acceptable outcome, you have the right to submit a complaint to the Dutch Data Protection Authority. More information on the Dutch Data Protection Authority and the procedure for submitting complaints can be found on the [website of the Dutch Data Protection Authority](#).

To exercise these rights, please contact privacy-tud@tudelft.nl.

6 Amendments to the privacy statement

We may amend this privacy statement from time to time. We therefore advise you to consult our privacy statement regularly.