

Privacy policy

Definitions

1. Xenia: owner of the domain www.saxenia.nl
2. User: those who visit www.saxenia.nl and members of Student Association Xenia.
3. Policy: the privacy policy which describes how the personally identifiable information, products and services provided on the website domain www.saxenia.nl are collected, protected and used. Additionally, the Policy describes the choices available to the user regarding Xenia's use of Personal Information and how one can access and update this information.
4. Personal information: personal identifiable information.
5. Website: www.saxenia.nl
6. Services: products and services provided on www.saxenia.nl

This Policy is a legally binding agreement between the website user and Xenia. By accessing and using the Website and Services, one acknowledges that one has read, understood, and agreed to be bound to the terms of this agreement. This Policy does not apply to the practices of companies that Xenia does not own or control, or to individuals that Xenia does not employ or manage.

Automatic collection of information

Xenia's top priority is user data security and, as such, it exercises the no logs policy. Xenia may process only minimal user data, only as much as it is absolutely necessary to maintain the Website and Services. Information collected automatically is used only to identify potential cases of abuse and establish statistical information regarding the usage and traffic of the Website and Services. This statistical information is not otherwise aggregated in such a way that would identify any particular user of the system.

Collection of personal information

Users can access and use the Website and Services without revealing any information that makes the identifiable. If, however, one wishes to use some of the features on the Website, one may be asked to provide certain Personal Information. Xenia receives and stores all information users knowingly provide to us when they create an account, or fill out online forms on the Website. If required, this information may include the following:

- Personal details such as name, country of residence, etc.
- Contact information such as email address, address, etc.
- Account details such as user name, unique user ID, password, etc.
- Payment information such as credit card details, bank details, etc.

Some of the information Xenia collects is directly derived from the user, via the Website and Services. Xenia may also collect Personal Information of the user from other sources such as public databases and our joint marketing partners. One can choose not to provide us with Personal Information, but then one may not be able to use all features on the Website. Users who are uncertain about what information is mandatory are welcome to contact Xenia.

Using and processing of collected information

In order to make the Website and Services available to users and to meet a legal obligation Xenia needs to collect and use Personal Information. If one does not provide the information Xenia requests, Xenia may not be able to provide the user with the requested products or services. Any of the information Xenia collects from its users may be used for the following purposes:

- To create and manage user accounts
- To send administrative information
- To respond to inquiries and offer support
- To improve user experience
- To enforce terms and conditions and policies
- To respond to legal requests and prevent harm
- To run and operate the Website and Services

Processing Personal Information depends on how the user interacts with the Website and Services, the geographical location of the user and if one of the following applies:

- (i) One has given consent for one or more specific purposes; this, however, does not apply, whenever the processing of Personal Information is subject to California Consumer Privacy Act or European data protection law;
- (ii) Provision of information is necessary for the performance of an agreement of the user and/or for any pre-contractual obligations thereof;
- (iii) processing is necessary for compliance with a legal obligation to which the user is subject;
- (iv) processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in Xenia;
- (v) processing is necessary for the purposes of the legitimate interests pursued by Xenia or by a third party.

Note that under some legislations Xenia may be allowed to process information until the user objects to such processing (by opting out), without having to rely on consent or any other of the following legal bases below.

Disclosure of information

Depending on the requested Services or as necessary to complete any transaction or provide any service you have requested, Xenia may share user information with user's consent with Xenia's trusted third parties, any other affiliates and subsidiaries Xenia relies upon to assist in the operation of the Website and Services available to the user. Xenia does not share Personal Information with unaffiliated third parties. These service providers are not authorized to use or disclose information except as necessary to perform services on Xenia's behalf or comply with legal requirements. Xenia may share Personal Information for these purposes only with third parties whose privacy policies are consistent with this Policy, or who agree to abide by this Policy with respect to Personal Information. Third parties are given Personal Information they need only in order to perform their designated functions, and Xenia does not authorize them to use or disclose Personal Information for own marketing or other purposes.

Xenia will disclose any Personal Information it collects, use or receive if required or permitted by law, such as to comply with a subpoena, or similar legal process, and when Xenia believes in good faith that disclosure is necessary to protect its rights, protect users safety or the safety of others, investigate fraud, or respond to a government request.

Retention of information

Xenia will retain and use your Personal Information for the period necessary to comply with legal obligations, resolve disputes, and enforce agreements unless a longer retention period is required or permitted by law. Xenia may use any aggregated data derived from or incorporating user's Personal Information after a user updates or deletes it, but not in a manner that would identify one personally. Once the retention period expires, Personal Information shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period.

Transfer of information

Depending on geographic location, data transfers may involve transferring and storing information in a country other than from the user's nationality. One is are entitled to learn about the legal basis of information transfers to a country outside the European Union or to any international organization governed by public international law or set up by two or more countries, such as the UN, and about the security measures taken by Xenia to safeguard information. If any such transfer takes place, one can find out more by checking the relevant sections of this Policy or inquire with Xenia using the information provided in the contact section.

The rights of users

One may exercise certain rights regarding your information processed by Xenia. In particular, one has the right to do the following:

- (i) one can withdraw consent where one has previously given consent to the processing of your information;
- (ii) one can object to the processing of information if the processing is carried out on a legal basis other than consent;
- (iii) one can learn if information is being processed by Xenia, obtain disclosure regarding certain aspects of the processing and obtain a copy of the information undergoing processing;
- (iv) one can verify the accuracy of information and ask for it to be updated or corrected;
- (v) one can, under certain circumstances, restrict the processing of information, in which case, Xenia will not process information for any purpose other than storing it;
- (vi) one can, under certain circumstances, obtain the erasure of your Personal Information;
- (vii) one can receive information in a structured, commonly used and machine readable format and, if technically feasible, to have it transmitted to another controller without any hindrance. This provision is applicable provided that designated information is processed by automated means and that the processing is based on consent, on a contract which you are part of or on pre-contractual obligations thereof.

The right to object to processing

Where Personal Information is processed for the public interest, in the exercise of an official authority vested in us or for the purposes of the legitimate interests pursued by Xenia, one may object to such processing by providing a ground related to your particular situation to justify the objection.

Data protection rights under GDPR

Residents of the European Economic Area (EEA) have certain data protection rights and Xenia aims to take reasonable steps to allow users to correct, amend, delete, or limit the use of your Personal Information. If one wishes to be informed what Personal Information Xenia holds about one and if one wants it to be removed from Xenia's systems, please contact Xenia. In certain circumstances, one has the following data protection rights:

- Users have the right to request access to Personal Information that is stored and have the ability to access Personal Information.
- Users have the right to request that Xenia correct any Personal Information the user believes is inaccurate. One also has the right to request Xenia to complete the Personal Information one believes is incomplete.

- Users have the right to request the erasure of your Personal Information under certain conditions of this Policy.
- Users have the right to object to Xenia's processing of Personal Information.
- Users have the right to seek restrictions on the processing of your Personal Information. When you restrict the processing of your Personal Information, we may store it but will not process it further.
- Users have the right to be provided with a copy of the information Xenia has on you in a structured, machine-readable and commonly used format.
- Users also have the right to withdraw consent at any time where Xenia relied on your consent to process your Personal Information.

Users have the right to complain to a Data Protection Authority about Xenia's collection and use of Personal Information. For more information, please contact the local data protection authority in the European Economic Area (EEA).

How to exercise these rights

Any requests to exercise rights can be directed to Xenia through the contact details provided in this document. Please note that Xenia may ask you to verify user identity before responding to such requests. The user's request must provide sufficient information that allows Xenia to verify that the user is the person he/she is claiming to be or that he/she is the authorized representative of such person. The user must include sufficient details to allow Xenia to properly understand the request and respond to it. Xenia cannot respond to the request or provide with Personal Information unless it first verifies identity or authority to make such a request and confirm that the Personal Information relates to the user.

Privacy of children

We do not knowingly collect any Personal Information of children under the age of 13. If users are under the age of 13, Xenia asks them not to please submit any Personal Information through the Website and Services. Xenia encourages parents and legal guardians to monitor their children's Internet usage and to help enforce this Policy by instructing their children never to provide Personal Information through the Website and Services without their permission. If one has reason to believe a child under the age of 13 has provided Personal Information to Xenia through the Website and Services, please contact Xenia. Users must also be at least 16 years of age to consent to the processing of Personal Information in the country in which they are located (in some countries Xenia may allow the parent or guardian to do so on their behalf).

Do Not Track signals

Some browsers incorporate a Do Not Track feature that signals to websites users visit that they do not want to have their online activity tracked. Tracking is not the same as using or collecting information in connection with a website. For these purposes, tracking refers to collecting personally identifiable information from consumers who use or visit a website or online service as they move across different websites over time. The Website and Services do not track its visitors over time and

across third party websites. However, some third party sites may keep track of browsing activities when they serve content, which enables them to tailor what they present to the user.

Email marketing

Xenia offers an electronic newsletter to which users can voluntarily unsubscribe at any time. Xenia is committed to keeping our users' email address confidential and will not disclose email addresses to third parties. Xenia will maintain the information sent via email in accordance with applicable laws and regulations.

In compliance with the CAN-SPAM Act, all emails sent by Xenia will clearly state the sender and provide clear information on how to contact the sender. A user may choose to stop receiving the newsletter or marketing emails by following the unsubscribe instructions included in these emails or by contacting Xenia. Users will continue to receive essential transactional emails.

Links to other resources

The Website and Services contain links to other resources that are not owned or controlled by Xenia. Please be aware that Xenia is not responsible for the privacy practices of such other resources or third parties. Xenia encourages to be aware when one leaves the Website and Services and to read the privacy statements of each and every resource that may collect Personal Information.

Information security

Xenia secures information users provide on computer servers in a controlled, secure environment, protected from unauthorized access, use, or disclosure. Xenia maintains reasonable administrative, technical, and physical safeguards in an effort to protect against unauthorized access, use, modification, and disclosure of Personal Information in its control and custody. However, no data transmission over the Internet or wireless network can be guaranteed. Therefore, while Xenia strives to protect Personal Information, users acknowledge that

- (i) there are security and privacy limitations of the Internet which are beyond Xenia's control;
- (ii) the security, integrity, and privacy of any and all information and data exchanged between the user and the Website and Services cannot be guaranteed;
- (iii) any such information and data may be viewed or tampered within transit by a third party, despite best efforts.

Data breach

In the event Xenia becomes aware that the security of the Website and Services has been compromised or users' Personal Information has been disclosed to unrelated third parties as a result of external activity, including, but not limited to, security attacks or fraud, Xenia reserves the right to take reasonably appropriate measures, including, but not limited to, investigation and reporting, as well as notification to and cooperation with law enforcement authorities. In the event of a data breach, Xenia will make reasonable efforts to notify affected individuals if it believes that there is a reasonable risk of harm to the user as a result of the breach or if notice is otherwise required by law. When Xena does, it will send the users an email, get in touch with you over the phone, or mail you a letter.

Changes and amendments

Xenia reserves the right to modify this Policy or its terms relating to the Website and Services from time to time in our discretion and shall notify users of any material changes to the way in which it treats Personal Information. When Xenia does, it will revise the updated date at the bottom of this page. Xenia may also provide notice to users in other ways in our discretion, such as through contact information users have provided. Any updated version of this Policy will be effective immediately upon the posting of the revised Policy unless otherwise specified. Users' continued use of the Website and Services after the effective date of the revised Policy (or such other act specified at that time) will constitute consent to those changes. However, Xenia will not, without your consent, use Personal Information in a manner materially different than what was stated at the time Personal Information was first collected by Xenia.

Acceptance of this policy

Users acknowledge that they have read this Policy and agree to all its terms and conditions. By accessing and using the Website and Services one agrees to be bound by this Policy. If one does not agree to abide by the terms of this Policy, one is not authorized to access or use the Website and Services.

Contacting Xenia

If a user would like to contact Xenia to learn more about this Policy or wishes to contact Xenia concerning any matter relating to individual rights and Personal Information, you may send an email to info@saxenia.nl.

This document was last updated on January 18, 2021