

# Privacy Policy

## [www.dualcareertools.com](http://www.dualcareertools.com) (Short: DualCareerTools)

Version 1.5 – Last update: 07/04/2022

DualCareerTools, an online platform that was developed by the Sport Psychology and Mental Support Research Group and is funded by and part of the Vrije Universiteit Brussel. DualCareerTools of VUB processes personal data. This privacy statement explains our guidelines for handling personal data, the questions and services you can request from us, and further information regarding privacy and data protection at DualCareerTools according to the principles stipulated by the new European General Data Protection Regulation (GDPR) that was enforced on 25 May 2018.

### Protection of Personal Data

DualCareerTools attaches great importance to the protection of your personal privacy. DualCareerTools reserves the right to make changes to the privacy statement if needed, to address the needs and requirements of society, as well as abide by the relevant laws and regulations. Therefore, DualCareerTools advises you to consult this statement regularly.

### Guarantees for Processing Personal Data

The Vrije Universiteit Brussel, with registered offices at Pleinlaan 2, 1050 Elsene (KBO 0449.012.406), is responsible for processing personal data from athletes, career support providers, students, researchers and staff, alumni, third party experts and visitors. We process this data for different reasons, which we explain in detail in the “purpose and legal basis” section.

Your personal data is always treated in accordance with the applicable privacy regulations. Processing of personal data is limited to the intended objective. Personal data will not be disclosed to third parties and will not be used for direct marketing, unless you have agreed to this yourself via an 'opt in'. DualCareerTools takes the best possible security measures to prevent third parties from misusing your personal data.

### Indirect processing of personal data

DualCareerTools will, wherever possible, inform you about any indirect processing of personal data. We will give information on the source of this personal data and the categories of personal data that are processed.

### Data, Purpose, Legal Basis, Transfer and Retention Time

We will not use your personal data for commercial purposes or other purposes than the ones described below. Nor will we share your data with any other organisations other than the ones involved in the Team(s) you have joined.

- When using our website as a visitor, you can access some of the information without you having to provide any personal information. To take the online assessments, however, you will be asked for personal data.
- **Register to take the tests**  
 DualCareerTools provides a registration Page for you to have a login for the assessment sections of the online tool.  
**Data:** name, E-mail, password.  
**Purpose(s):** Account management;  
**Legal basis:** execution of contract and providing the service requested (art. 6.1.b GDPR)  
**Transfer:** your data are not transferred to third parties, except if you (have) provide(d) approval for this by joining a (new) team.  
**Retention time:** your data are stored indefinitely, until the subject has opted out
- **Register to take the tests**  
 DualCareerTools provides a registration Page for you to have a login for the assessment sections of the online tool.  
**Data:** Nationality, Gender, Age, Sport, Highest level of sport, Highest educational degree, Current role, Current educational institution, Study Domain, Employer, Function.

  - A. **Purpose(s):** Share your personal data/profile with the team administrator of your team; Aggregation and analyses on group/team level to optimize support on group/team level.  
**Legal basis:** execution of our contract (art. 6.1.b GDPR) and Legitimate interest controller and team administrators (art. 6.1.f GDPR)  
**Transfer:** your data are not transferred to third parties, except if you (have) provide(d) approval for this by joining a (new) team.  
**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops
  - B. **Purpose(s):** Use (anonymized/pseudomized) data for research purposes;  
**Legal basis:** Public interest (art. 6.1.e GDPR)  
**Transfer:** your data are not transferred to third parties  
**Retention time:** your data are stored indefinitely, until the subject has opted out
- **Self-evaluation assessment** (“I combine elite sport with education”, “I assist student-athletes in their dual career” or “I make the transition from elite sport to the job market”)  
**Data:** Scores on a 5-point scale for importance and possession, qualitative reflections on the visual representation at factor level (Recognition, most important competence, greatest strength, weakness and need for development), qualitative reflections on the visual representation at item level (greatest strength, weakness and need for development), Action points (increase strengths, address weaknesses, improve development needs).

  - A. **Purpose(s):** Visual representation in function of self-reflection and self-development;  
**Legal basis:** execution of our contract (art. 6.1.b GDPR)

**Transfer:** your data are not transferred to third parties, except if you approve to share your feedback report yourself;

**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops

**B. Purpose(s):** Share your data with the team administrator of your team (if you have given your consent) as a starting point of their individual support; Aggregation and analyses on team level to optimize support on team level.

**Legal basis:** execution of our contract (art. 6.1.b GDPR) and Legitimate interest controller and team administrators (art. 6.1.f GDPR)

**Transfer:** your data are not transferred to third parties, except if you approve to share your feedback report yourself;

**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops

**C. Purpose(s):** Use (anonymized/pseudomized) data for research purposes;

**Legal basis:** Public interest (art. 6.1.e GDPR)

**Transfer:** your data are not transferred to third parties

**Retention time:** your data are stored indefinitely, until the subject has opted out

- **360° evaluation assessments** (for the tests “I combine elite sport with education”, “I assist student-athletes in their dual career” or “I make the transition from elite sport to the job market”)

**Data:** Both a guest’s (evaluations) and athletes’ (subject of assessment) data are processed. Scores on a 5-point scale for importance and possession, qualitative reflections on the visual representation at factor level (Recognition, most important competence, greatest strength, weakness and need for development), qualitative reflections on the visual representation at item level (greatest strength, weakness and need for development), Action points (increase strengths, address weaknesses, improve development needs).

**A. Purpose:** Visual representation in feedback report in function of reflection and self-development of the person you completed the test about;

**Legal basis:** execution of our contract (art. 6.1.b GDPR)

**Transfer:** your data will be transferred to the person that has requested to fill in the test (i.e; the visual feedback report) and to other third parties if you have provided specific approval;

**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops.

**B. Purpose(s):** As information for guidance by support providers of the person you completed it about (if sharing to third parties was allowed by you);

**Legal basis:** execution of our contract (art. 6.1.b GDPR)

**Transfer:** your data will be transferred to the person that has requested to fill in the test (i.e; the visual feedback report) and to other third parties if you have provided specific approval;

**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops

**C. Purpose(s):** Aggregation and analyses on team level to optimize support on team level;

**Legal basis:** execution of our contract (art. 6.1.b GDPR) and Legitimate interest controller and team administrators (art. 6.1.f GDPR)

**Transfer:** your data will be transferred to the person that has requested to fill in the test (i.e; the visual feedback report) and to other third parties if you have provided specific approval;  
**Retention time:** your data are stored indefinitely, until the subject has opted out and our contract stops.

**D. Purpose:** Use (anonymized/pseudomized) data for research purposes;

**Legal basis:** Public interest (art. 6.1.e GDPR)

**Transfer:** your data are not transferred to third parties

**Retention time:** your data are stored indefinitely, until the subject has opted out

### Privacy Policies of Other Websites

DualCareerTools website contains links to other websites. Our privacy policy applies only to our website, so if you click on a link to another website, you should read their privacy policy.

### Storage of Your Personal Data

DualCareerTools securely stores your personal data throughout the indicated retention time. For storage, we apply the following protection and security measures:

- Data are sent encrypted via https to dedicated servers that are secured in line with the market:
  - ✓ Encryption via open standards
  - ✓ Encryption for Data at Rest
  - ✓ Encryption for Data in Motion
  - ✓ Management of encryption keys
- Data are treated confidentially;
- Termination on the perimeter of the secured network
- Physical and logical access protection
- Removing information before equipment is disposed of
- Locking or securing mobile devices
- Using proven methods for information removal
- Logging of data accesses
- Network segmentation
- Transport security
- Anti-malware
- Appointed a DPO
- Incident management
- Awareness raising
- Strong identification
- Access management, minimum access rights
- Validation with authorisation of the accesses
- Password policy
- Retention policy
- Ensuring integrity and confidentiality by means of cryptographic measures
- Privacy by design
- Employees sign confidentiality statement
- Processing register

## Data subjects' rights

DualCareerTools would like to make sure you are fully aware of all your data protection rights. Every user is entitled to the following:

- **right to access** – You have the right to request DualCareerTools for copies of your personal data.
- **right to rectification** – You have the right to request that DualCareerTools corrects any information you believe is inaccurate. You also have the right to request DualCareerTools to complete the information you believe is incomplete.
- **right to erasure** – You have the right to request that DualCareerTools deletes your personal data under the conditions determined by law.
- **right to restrict processing** – You have the right to request that DualCareerTools restricts the processing of your personal data, under certain conditions.
- **right to object to processing** – Whenever the processing is based on general or legitimate interest (art. 6.1.e & f GDPR), you have the right to object to DualCareerTools processing of your personal data, under certain conditions.
- **right to data portability** – You have the right to request that the Brussels Centre for Urban Studies transfers the data that we have collected to another organization, or directly to you, under certain conditions and as far as it is technically possible.

When our processing activity is based on your prior consent (art. 6.1.a GDPR), withdrawal of such given consent is always possible without this affecting the lawfulness of the processing of personal data as this is on the basis of the permission previously granted.

To exercise your rights as a concerned party, it suffices to send your question to [dpo@vub.be](mailto:dpo@vub.be) or send a written request to Pleinlaan 2, 1050 Brussels – Building M – Office 508. In both cases, add a copy of your identity card that only shows the front side, your name and your ID picture. If you do not wish to share a scan of your ID documentation, please provide us with other information by which we can verify the legitimacy of your request.

## Accountability and processing – data protection officer

The Vrije Universiteit Brussel values your right to privacy. The Vrije Universiteit Brussel, with registered office at Pleinlaan 2, 1050 Brussel, represented by its rector is responsible for processing your personal data. In case you have specific questions about your rights concerning the processing of your data, you can contact the university's data protection officer, by email on [dpo@vub.be](mailto:dpo@vub.be).

## Complaints

Finally, should you wish to file a complaint about how your information is treated, you can contact the Belgian Data Protection Authority who is responsible for upholding the law on data protection: Data Protection Authority (GBA), Drukpersstraat 35, 1000 Brussel, +32 2 274 48 00, [contact@apd-gba.be](mailto:contact@apd-gba.be), [www.gegevensbeschermingsautoriteit.be](http://www.gegevensbeschermingsautoriteit.be)

Complaints filed with the GBA do not limit your right to lodge legal proceedings before the competent court in any way; nor does it limit the possibility to request compensation for damage suffered.