

Qualtrics CoreXM Privacy Statement

This privacy statement describes how Saxion University of Applied Sciences (hereinafter 'Saxion') processes your personal data. Saxion also has a privacy policy in addition to this privacy statement. The privacy policy describes how our employees are obliged to manage personal data. Students and employees can consult the privacy policy via MySaxion on the 'Information Security & Privacy' theme site.

About Saxion

Saxion's Executive Board is the data controller as defined in the General Data Protection Regulation (GDPR) and is therefore ultimately responsible for the lawful and careful processing of personal data within Saxion. The Executive Board establishes the policy, measures and procedures relating to the processing of personal data.

Saxion is located at M.H. Tromplaan 28, 7513 AB in Enschede. Saxion's postal address is PO Box 70000, 7500 KB Enschede. For questions about this privacy statement or other questions regarding the processing of personal data, please send an email to privacy@saxion.nl.

For what purposes does Saxion process my personal data?

Saxion makes the Qualtrics CoreXM program, provided by Qualtrics LLC, available to its students and staff for the purpose of collecting data for research purposes. The data that is collected may include personal data. Qualtrics CoreXM is not used for the storage of research data within Saxion.

What (special categories of) personal data does Saxion collect about me?

If you are a Saxion employee or student with access to Qualtrics CoreXM, the following personal data will be processed to authorise your use of the program:

- Role within Saxion (student or employee)
- First and last name
- Saxion email address
- Student or staff number

When using Qualtrics as a respondent, various categories of personal data may be collected. This varies depending on the survey and the specific questions being asked. The data that can be collected through surveys conducted in Qualtrics include:

- Name and contact details
- IP address and location information
- Research data in the broadest sense of the word. This can also be sensitive personal data. Sensitive personal data enjoys extra protection under the GDPR because there is a significantly higher privacy risk for data subjects. This includes:
 - Personal data revealing a person's racial or ethnic origin;
 - Personal data revealing a person's political opinions
 - Personal data revealing a person's religious or philosophical beliefs;
 - Personal data revealing membership of a trade union;
 - Personal data about a person's health;
 - Personal data about a person's sex life or sexual orientation;
 - Genetic data;
 - Biometric data (for the purpose of uniquely identifying a natural person).

Saxion only processes sensitive personal data if the additional conditions of the GDPR as described in Article 9 of the GDPR are met.

In certain cases, Qualtrics may act not as a data processor, but as a data controller. When acting as a data controller, Qualtrics independently determines the purposes of the processing of personal data. In the case of Qualtrics, this includes the following:

- Contact information
- Financial and payment information
- Communication information (e.g. inquiries submitted to Qualtrics)
- Marketing information (collected through cookies)
 - Device information
 - Online activities (within the Qualtrics website)
- IP address
- Session replay
- Social media information (through interaction with Qualtrics social media channels)

For more information about the processing activities carried out by Qualtrics itself or if you wish to exercise your privacy rights in relation to those activities, please refer to the [privacy statement](#) of Qualtrics.

On what legal basis is Saxion permitted to process my data?

To process personal data, Saxion must have a legal basis under the GDPR. Employees may use Qualtrics CoreXM when this is necessary to perform duties under their employment contract. Student data is processed on the basis of legitimate interest. Personal data of respondents is processed on the basis of their consent.

How long does Saxion retain my personal data?

Saxion retains your personal data only as long as necessary for the purposes for which it was collected, or as long as required by applicable laws or regulations. For example, retention periods under the Public Records Act (as set out in the [Universities of Applied Sciences Retention Schedule](#)) or under tax and employment laws. The retention period is determined by Saxion per processing activity. If you want to know the retention period of a specific processing activity, you can contact Saxion at privacy@saxion.nl. Additional retention periods apply to scientific research. (<https://www.kcbr.nl/ontwikkelen-beleid-en-regelgeving/avg-proof-wetgeven/bewaartermijnen>) Depending on the purpose of the processing activity and the personal data collected, retention periods may vary.

What are my rights under the GDPR?

When Saxion processes your personal data, you have the following rights under the GDPR:

- Right of access: you have the right to view the personal data that Saxion processes about you.
- Right to rectification: you have the right to correct or complete the personal data that Saxion processes about you if it is incorrect or incomplete.
- Right of objection: you can object to the processing of your personal data. You can also object to personally targeted ads.
- Right to erasure: you may request Saxion to delete your personal data.

- Right to withdraw your consent: if you have given Saxion permission to process your personal data, you can withdraw this consent at any time.
- Right to data portability: if it is technically possible, you have the right to have the personal data that Saxion processes about you transferred to a third party.
- Right to restriction of processing: in some cases, you can request Saxion to restrict the processing of your personal data. This may also be a temporary restriction.

How can I exercise these rights?

Do you have an active Saxion account? Submit your request through the Service Portal (Information Security & Privacy – GDPR – Exercising your rights under the GDPR).

If you do not have a Saxion account you can submit your request through privacy@saxion.nl. Saxion will examine and assess each case individually to determine whether a specific request can be granted. Exercising your rights is free of charge, except in cases of abuse. To process your request, Saxion will need to determine your identity to ensure that personal data is not shared with unauthorised parties or modified without authorisation. Once your identity has been determined, Saxion will respond to your request within four weeks.

During this process, a request will be made via the Saxion administrators of Qualtrics CoreXM using the [guide](#) below. For additional requests, you may also contact privacy@saxion.nl.

How does Saxion protect my personal data?

Saxion takes appropriate technical and organisational measures to protect your personal data against misuse, loss, unauthorised access, unwanted disclosure and unauthorised modifications.

With whom does Saxion share my personal data?

Saxion only shares personal data with third parties where this is in accordance with applicable laws and regulations. This primarily occurs when Saxion is required to do so in order to comply with its legal obligations.

This involves sharing personal data with, for example, the Tax and Customs Administration, municipalities, the Ministry of Education, Culture and Science, DUO, the Higher Education Inspectorate and the Immigration and Naturalisation Service.

Saxion also engages third parties, such as Qualtrics, to support the delivery of its services. In such cases, Saxion only provides the personal data that is necessary for the task to be carried out. Where required, appropriate agreements are put in place.

The supplier of Qualtrics CoreXM have reported zero data disclosure requests from foreign intelligence authorities in the previous calendar year.

Transfer to foreign countries

Most parties to which the Saxion provides personal data are located within the European Economic Area (EEA). A provision can only take place if, among other things, there is a valid legal basis for it and the receiving party complies with the legal requirements of the GDPR.

If personal data is transferred to a party outside the European Economic Area, appropriate safeguards and arrangements will be put in place to ensure that the data is processed securely and in compliance with the GDPR.

Questions? Complaints?

At Saxion, the Data Protection Officer (DPO) supervises and advises on the application of and compliance with the GDPR and Saxion's privacy policy, as well as the allocation of responsibilities. The statutory tasks and responsibilities of the DPO provide the officer with an independent position in carrying out their duties.

The DPO also contributes to raising privacy awareness. The DPO is the contact point for and collaborates with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens). If you believe that your personal data is being processed by Saxion in breach of the GDPR, you can file a complaint with the DPO via: functionarisgegevensbescherming@saxion.nl. The DPO acts independently and may consult or seek advice from the Dutch Data Protection Authority regarding your complaint.

Questions?

If you have any questions about this privacy statement, please contact us at privacy@saxion.nl.

Staff and students can direct general questions about the use of Qualtrics CoreXM to the Self-Service Portal.

Modifications

This privacy statement was last updated in August 2026