

Privacy statement for the reading list service *Pensumlistetjenesten*

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About the privacy statement

This privacy statement describes how the data controller processes your personal data in the service. The purpose of this privacy statement is to inform you about what personal data we process, how it is processed, who is responsible for the processing, what your rights are and who you can contact.

What are personal data?

Personal data are all forms of data, information and assessments that can be linked to you as a person, cf. [the Personal Data Act](#) Section 2 and [the GDPR](#) Article 5(1). The decisive factor as to whether data constitutes personal data is whether it can be linked to a specific person. Data that, on its own, cannot be linked to an individual person may constitute personal data in cases where the data are found together with other data.

The service in brief

The service comprises a reading list system, which is integrated with the platform for library services (Alma). The service extends the library system to include functions for maintenance and availability of reading lists relating to courses at the data controller's institution. Academic personnel establish and maintain the reading lists. These are then made available to students through integration with the data controller's learning platform. The students can set up their own collections of references, mark references in different ways, suggest new references for the course, and enter into dialogue with lecturers and other students on the course.

The service helps the section for academic affairs and library to coordinate orders and make resources available, as well as giving the academic personnel a better overview of what resources the students use. The service uses the library system's functions for user management, authentication and storage.

The service does not allow processing of sensitive personal data.

The purpose of personal data processing in the service

The service registers different types of users and pertaining data for the following purposes

Types	Description	Purpose of processing
Administrative users	Academic personnel and administrative staff	Reading list management
End users	Students with access to the reading lists	Offers reading lists to end users and functions for creating own lists, content assessments and dialogue between academic personnel and other end users.
Library staff	Librarians and users of the library system.	Have access to all reading lists so they can order and make resources available at the library, and to assist in creating and quality assuring reading lists.

In addition to ordinary user data, data about authors are also processed in order to correctly refer to titles and to accredit authors on the reading lists.

Registered personal data, legal grounds and storage time

Personal data related to user accounts in the service requires consent as legal grounds, cf. [the Personal Data Act, and the GDPR](#) Article 6(1)(a).

Registered personal data about authors and contact persons are covered by [the Personal Data Act, and the GDPR](#) Article 6(1)(f) – to perform a task on grounds of legitimate interests.

The service does not allow processing of sensitive personal data. In the cases where the users themselves can write information in the comments field and similar, the user is obliged to meet the requirements and guidelines for the service. Users are not permitted to register sensitive personal data about themselves or others or to use the service for defamatory conduct.

The data controller is entitled to store information for statistical purposes, if this is in the interests of society at large, cf. [the Personal Data Act](#) Section 8 and [the GDPR](#) Article 6(1)(e).

The following personal data is processed in the service:

User data

Type of data	Description	Source
Basic user data	Full name	Alma, Feide
Contact information	Email address assigned by the organisation.	Alma, Feide
Affiliation to the organisation	The organisation's org. no and user's role in the organisation, and any other assigned roles, e.g. employee or student.	Alma, Feide
References	The user's own lists with references, notes and assessments. Can be erased by the user.	The reading list system.
Assessment of references	Private key words, tags or notes related to the references in the reading list.	The reading list system.
Notifications	The user's own posts in the forum or messaging channels. Cannot be erased by the user. To erase this, an enquiry must be sent to the service administrator. Posts written by the user, the user's name and any profile pictures will be visible to other users.	The reading list system.
Profile pictures	The user's profile picture obtained from Facebook. Users must actively choose to use this function and it is optional.	Facebook

Technical user data

Type of data	Description	Source
System identities	Unique identity assigned by the service and integrated system.	Alma, Feide, FS
Personal ID number	Forwarded in standard extracts from FS to the service for academic personnel, and not students. The personal ID number is erased after transfer and is not used in the service.	FS
Contact information	Email address assigned by the organisation.	Alma, Feide
System roles and affiliation to the organisation	The user is assigned roles in the system in order to provide adapted functionality and access to the service.	The reading list system, Alma, Feide.
Session information and cookies	Information related to the user's dialogue with the service. Necessary to adapt functionality in the service and to authenticate users.	The reading list system, Feide.

Log	Log of system use related to the logged-in user and/or their IP address. The purpose of logs is to ensure security and integrity in the system, provide user support and analyse use of the service. The data collected include time of use, information about browsers and hardware, session information and other information that browsers normally provide.	The reading list system.
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Other personal data

Type of data	Description	Source
Bibliographic data – author of the title	The author's name together with titles in the reading lists.	The reading list system or referred from resources in Alma.

Information about your activity is stored in order to provide user support and to gain an impression of general use of the service.

Personal data is stored until one of the following occurs:

- User consent is withdrawn
- The purpose of the personal data processing has been fulfilled
- The data controller decides to discontinue the service.

Logs and backups of the system data are stored for up to one year.

Automatic case processing

Personal data will not be subject to automated case processing or profiling.

Disclosure of your personal data to third parties

Disclosure or export of data is defined as all disclosure of data aside from to the service's own system/processing or to the data subjects themselves, or to someone who receives data on their behalf.

Your personal data will be disclosed to the following countries outside the EU/EEA:

- Israel, through the subcontractor Ex Libris GmbH. Israel is on the EU Commission's [list](#) of approved third countries, without additional security measure requirements.
- Data are stored in the EU/EEA, but disclosed to companies based in the USA through Amazon.com Inc, Ex Libris GmbH's subcontractor. The data that are stored in Amazon does not include personal data.

If the data controller has configured use of Google Analytics

- The service supports use of Google Analytics to analyse traffic related to the user's IP address. Contact the data controller for details.

Personal data are processed by the subcontractor Ex Libris GmbH, a company in the Ex Libris Group, which is an international organisation.

Your personal data will be disclosed to Unit/BIBSYS, which is the service provider, and to its subcontractors.

Subcontractors	Function
Ex Libris GmbH	Cloud management and development of the systems Leganto and Alma.
NTNU	Premises for server management for Unit's direct services
Blue Safespring AB	Cloud management and backup for Unit's direct services
UNINETT AS	Delivers Feide, for authentication of users of the services

The subcontractors' staff who need the personal data to perform their work will have adapted access in order to provide user support and any rectification of errors in the service.

Security in relation to your personal data

Personal data processed in the service are secured by several measures. All transfers to and from the service are encrypted. Unit/BIBSYS conducts regular risk and vulnerability analyses and tests the security of the service to ensure your personal data are safe. Security measures employed by our subcontractor Ex Libris are documented [here](#).

Employees who process your personal data are subject to a duty of confidentiality, which also applies to our subcontractors' employees.

Your rights

Right to information and access

You have a right to receive information about how your personal data are processed in the service. This privacy statement has been produced to provide the information you have a right to receive. You also have a right to see/access your personal data that are registered in the service, and other personal data that are collected after you have actively logged in. You also have the right to request to receive a copy of your personal data.

A self-service solution in the service where users can see their personal data after logging in allows users to exercise their right of access. If the service does not provide complete information via the self-service solution, users can send a written enquiry to the data controller to acquire access to more detailed information.

Right to rectification

You have a right to have inaccurate personal data about you rectified. You also have a right to have incomplete personal data about you supplemented. If you feel that the service shows inaccurate or incomplete personal data, please contact the data controller, stating the reason why the personal data are inaccurate or incomplete.

Right to restriction of processing

In certain cases, you may have a right to request restrictions on the processing of your personal data. Restricted processing means that the personal data will still be stored, but that other processing in the service is restricted. To request restricted processing of personal data, the conditions in the Personal Data Act and the GDPR Article 18 must be met. You can request restricted processing

- Pending the data controller rectifying inaccurate or incomplete personal data
- If you have submitted an objection to the processing (see below for more details)
- If the personal data are necessary to establish or defend a legal claim

If restricted processing is granted, the data controller will notify you of this before the restriction is lifted.

Right to erasure

You have the right to demand that we erase personal data about you. If you would like your personal data erased, please contact the data controller or use the erasure function in the service. It is important that your request states why you want your personal data erased and if possible, what personal data you wish to be erased.

Please note that legislation provides exemptions from the right to erasure in some cases. This could be cases where we process personal data to fulfil a statutory duty or to address important social interests, such as archiving, research and statistics.

Right to object

You have a right to object to processing of your personal data on certain conditions defined in the [GDPR](#) Article 21. This applies if:

- Legal grounds for the processing of personal data are based on legitimate interests, reasons of public interest or when exercising public authority
- Processing of personal data entails direct marketing or profiling
- Personal data are processed for scientific or historical research purposes or statistical purposes

The service does not generally satisfy these conditions, with the exception of the processing of author information and in cases where personal data are used for statistical purposes. When personal data are used for statistical purposes, the data are anonymised.

However, please note the following:

- If there is a special need to stop the processing, for example if you have a need of protection, or a confidential address or similar, please contact the data controller.
- When you have consented to the processing of personal data, you have a right to withdraw your consent.

Right to complain about the processing

If you feel that we have not processed personal data in a correct or lawful manner, or if you feel that you have been unable to exercise your rights with us, you have a right to complain about the processing. See our contact details below.

If we do not uphold your complaint, you have the possibility of filing a complaint with the Norwegian Data Protection Authority. The Data Protection Authority is responsible for ensuring that Norwegian enterprises comply with the provisions of the Personal Data Act and the GDPR in their processing of personal data.

Contact

The data controller

The institution is the data controller for personal data in the service and is the primary contact for end users. See [link](#).

The data processor

Unit develops and manages the service on behalf of the data controller and has the role of data processor.

Unit user support's contact details

<http://support.bibsys.no>

Tel. +47 958 24 000

Email: support@bibsys.no