

### PRIVACY STATEMENT – PROGRESS REPORTING IN PHD EDUCATION

Approved by Division of Research, Internationalisation and Innovation 26.2.2025

## 1. What is a Privacy Statement?

A privacy statement describes which personal data is processed, how the data is processed, who is responsible for the processing, what rights you have as a data subject, and who you can contact regarding your personal data.

Personal data is information and assessments that can be linked to an individual. This can be, for example, name, telephone number, email address, IP address, etc.

## 2. Data controller

The Western Norway University of Applied Sciences (HVL) is the data controller when we process personal data about you.

## 3. Purpose and legal basis

#### 3.1 Purpose

According to § 4-8 in the Regulations for the Degree of Philosophiae Doctor (PhD) at the Western Norway University of Applied Sciences, the quality assurance system for PhD education shall include annual and separate reporting from the PhD candidate and supervisor.

The purpose of collecting annual reports from PhD candidates and supervisors is twofold:

- to identify any challenges for individual candidates to provide appropriate follow-up
- to contribute to the development of quality in PhD education at HVL

## 3.2 Legal basis

Processing of personal data in progress reporting for the PhD education at HVL is necessary to fulfil a legal obligation that rests on the data controller, cf. the General Data Protection Regulation (GDPR) article 6(1)(c), cf. the Regulations for the Degree of Philosophiae Doctor (PhD) at the Western Norway University of Applied Sciences § 4-8, cf. the Universities and University Colleges Act § 2-8.

## 4. Processing of personal data

## 4.1. Data collected about you

#### PhD candidate

We collect the following personal data about you:

1. Name



- 2. Email address
- 3. PhD programme
- 4. Names of supervisors
- 5. PhD courses you have completed

You provide information on the following topics:

- 1. Employment relationship and funding
- 2. Duty work
- 3. Affiliation with research environments and research schools
- 4. Supervision (collaboration, frequency, etc.)
- 5. Thesis and publications
- 6. Status of training component
- 7. Status of progress in the PhD project

## Supervisor

We collect the following personal data about you:

- 1. Name
- 2. Email address
- 3. Names of PhD candidates for whom you are the main supervisor

You provide information, for each candidate you supervise, on the following topics:

- 1. Supervision (collaboration, frequency, etc.)
- 2. Status of progress in the PhD project

## 4.2 How the personal data is processed

Only employees at HVL with an official need will have access to your personal data and will process your personal data. We process the data confidentially and in compliance with data protection regulations.

The progress reports will be reviewed by the Academic Head of the PhD programme and the PhD coordinator. Any delays in progress or other issues that require implementing measures will be addressed to ensure that HVL can support the candidate in the best possible way in maintaining good progress and completing the PhD education. If follow-up is necessary, the Academic Head of the PhD programme or the PhD coordinator will contact you to arrange the next steps.

Based on reports from PhD candidates and supervisors, the Academic Head of the PhD programme prepares a comprehensive report for the programme committee and the dean regarding the progress of the PhD candidates. Statistics are extracted from selected questions, but these will not be linked to individuals. The comprehensive report will provide information on the scope of various types of challenges and the follow-up on these, and it will not contain personal data about individual candidates or supervisors. The programme committee decides on any measures to ensure the quality of the PhD education.

## 4.3 Storage of personal data

The progress reports are stored in the "Portal for Progress Reporting", which is stored on HVL's server. The portal requires login (FEIDE login) for both those who need to complete progress reports



and the few who need access to the reports. Only individuals who have been granted access will be able to log in to the portal.

Data may be exported from the portal. In such cases, HVL's routine for storing information that requires protection and access control will be followed, and the data will be stored in such a way that only those who have access to the data in the "Portal for Progress Reporting" will have access to the exported data. The exported data will be deleted once the processing of the current year's progress reporting has been completed.

The progress reports will be stored in their entirety in the portal until the candidate has completed the PhD education (i.e. after the PhD defence, voluntary or forced termination or expiry of the admission period). After that, the information in the progress reports will be anonymised. Both the candidate's progress reports and the supervisor's reports for the respective candidate will be anonymised.

The progress reports will be archived in accordance with applicable legislation.

## 5. Your rights

## 5.1 Right to information and access

You are entitled to receive information about how HVL processes your personal data. This Privacy statement is intended to describe the information you are entitled to receive. You also have the right to access all personal data recorded about you at HVL, and you have the right to receive a copy of personal data about you, if you wish.

### 5.2 Right to correction

You have the right to have incorrect personal data about you corrected. You also have the right to have incomplete personal data about you supplemented. If you believe we have recorded incorrect or incomplete personal data about you, please contact us. It is important that you justify and, if possible, provide documentation on why you believe the personal data is incorrect or incomplete.

## 5.3 Right to restriction of processing

You may have the right to request that the processing of your personal data be restricted. Restriction of personal data means that the data will still be stored, but the possibilities for further use and processing are limited. If you believe that your personal data is incorrect or incomplete, or if you have objected to the processing, you have the right to request that the processing of your personal data be temporarily restricted. This means that the processing is limited until we have either corrected your personal data or assessed whether your objection is justified. In other cases, you may also request a more permanent restriction of your personal data. To have the right to request restriction of your personal data, the conditions in Article 18 of the General Data Protection Regulation must be met. If we receive a request from you regarding restriction of personal data, we will assess whether the legal conditions are met.

### 5.4 Right to deletion

You may have the right to request deletion of your personal data. The right to deletion is not an unconditional right, and whether you are entitled to deletion must be assessed in light of the



Personal Data Act and the General Data Protection Regulation. If you wish to have your personal data deleted, we ask that you contact us. It is important that you justify why you want the personal data to be deleted and, if possible, also specify which personal data you want to be deleted. We will then assess whether the legal conditions for requesting deletion are met. There may be exceptions in the legislation regarding the right to deletion. This may be the case, for example, when we need to store personal data to fulfil a task required by the Universities and University Colleges Act, or to safeguard important societal interests such as archiving, research, and statistics.

## 5.5 Right to object

You may have the right to object to the processing if you have a particular need to have the processing of your personal data stopped. Examples may include if you have a need for protection, a confidential address, or similar. The right to object is not an unconditional right, and it depends on the legal basis for the processing and whether you have a particular need. If you object to the processing, we will assess whether the conditions for objecting are met. If we find that you have the right to object to the processing and that the objection is justified, we will stop the processing, and you may also request deletion of the data. Please note that in some cases we may still make exceptions to deletion, for example, if we need to store personal data to fulfil a task required by the Universities and University Colleges Act, or to safeguard important societal interests.

## 5.6 Right to complain

If you believe that we have not processed your personal data in a correct and lawful manner, or if you believe that we have not been able to fulfil your rights, you have the option to file a complaint about the processing. You will find information on how to contact us in the section below. If we do not uphold your complaint, you have the option to escalate it to the Data Protection Authority. The Data Protection Authority is responsible for ensuring that Norwegian companies comply with the provisions of the Personal Data Act and the General Data Protection Regulation when processing personal data.

#### 6. Contact

#### 6.1 Data controller

If you wish to exercise your rights outlined in Chapter 5, or if you have any questions/comments regarding this statement, you can contact us by sending an email to <a href="mailto:AFII-PhD@hvl.no">AFII-PhD@hvl.no</a>.

# 6.2 Data Protection Officer

The Data Protection Officer can be contacted regarding any questions about the processing of your personal data and the exercise of your rights. The Data Protection Officer can be contacted by e-mail at: personvernombudet@hvl.no.