

Emne: Subject:	GDPR og IT-sikkerhed	Filnavn: Title:	Privacy policy - processing of Personal Data for Students, Pupils and Course Participants
Opdateret: Updated:	05-03-2026	Version: Version:	1
Opdateret af: Updated by:	Victoria Roland	Godkendt af: Approved by:	Kim René Nielsen

Privacy policy – processing of Personal Data for Students, Pupils and Course Participants

Version History:

Version #	Release dato	Ændring
03	2026-03-05	Addition of purpose and legal basis for processing, categories of personal data, use of images of students at the student residence, study activity in Insights in Microsoft Teams and video surveillance.
02	2023-08-01	Privacy policy for students (Q-0532)
01	2019-08-23	Privacy policy for MARTEC (Q-0219)

1 Data Controller

The data controller responsible for the processing of your personal data is:

MARTEC

Hånbækvej 54

9900 Frederikshavn

Denmark

Phone: +45 9620 8888

MARTEC has appointed a Data Protection Officer (DPO) who can be contacted regarding questions about the processing of personal data.

2 Purpose of the Processing

MARTEC processes personal data to administer and deliver educational programs, courses and related services.

Your personal data may be processed for the following purposes:

- administration of admission applications
- administration of enrolment and participation in education or courses
- monitoring of study activity and academic progression
- issuing diplomas, certificates and other documentation
- compliance with statutory reporting obligations to public authorities
- access control and security on MARTEC premises
- emergency preparedness and evacuation procedures
- administration of accommodation at student residences and catering services
- organization of conferences and events
- communication, information and marketing activities relating to MARTEC

3 Legal Basis for Processing

MARTEC processes personal data on the following legal bases under Article 6 of the General Data Protection Regulation (GDPR):

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Article 6(1)(a) – Consent

Processing based on the data subject's voluntary consent, for example in connection with marketing and communication activities.

Article 6(1)(b) – Performance of a Contract

Processing necessary for the performance of a contract relating to the student's participation in education, courses or accommodation services.

Article 6(1)(c) – Compliance with a Legal Obligation

Processing necessary for compliance with legal obligations under Danish legislation, including but not limited to:

- the **Danish Act on Maritime Education** (*lov om maritime uddannelser*) and related executive orders
- the **Executive Order on Admission Regulation for Higher Education Programmes** (*bekendtgørelse af lov om adgangsregulering ved videregående uddannelser – Adgangsbekendtgørelsen*)
- the **Executive Order on Examinations in Maritime Education** (*bekendtgørelse om prøver i de maritime uddannelser*)
- the **Danish Archives Act** (*arkivloven*)
- the **Executive Order on Preservation and Disposal of Records at Universities, Academies of Professional Higher Education, University Colleges, Upper Secondary Education Institutions, etc.** (*bekendtgørelse om bevaring og kassation af arkivalier hos universiteter, erhvervsakademier, professionshøjskoler, ungdomsuddannelser m.fl.*)
- the **Danish Act on State Educational Grants and Loans** (*lov om statens uddannelsesstøtte – SU-loven*) and related executive orders
- the **Danish Act on Special Educational Support in Higher Education** (*lov om specialpædagogisk støtte ved videregående uddannelser – SPS-loven*) and related executive orders
- the **Danish Bookkeeping Act** (*bogføringsloven*)

Article 6(1)(e) – Public Interest / Exercise of Official Authority

Processing necessary for the performance of tasks carried out in the public interest or in the exercise of official authority, including obligations arising from:

- the **Danish Public Administration Act** (*forvaltningsloven*)
- the **Danish Access to Public Administration Files Act** (*offentlighedsloven*)
- the **Danish Act on TV Surveillance** (*lov om tv-overvågning*)

4 Categories of Personal Data

MARTEC may process the following categories of personal data:

Identification and contact information

- name
- address
- telephone number
- email address
- CPR number (Danish civil registration number)

Educational information

- previous educational qualifications

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- admission documentation
- diplomas and certificates
- applications for credit transfer or exemptions
- information relating to study progression and examinations

Administrative information

- internship placement
- absence records
- participation in courses or events
- information relating to student residence accommodation

Other information

- photographs and video recordings
- health information where relevant for educational support or accommodations

5 Sources of Personal Data

Personal data is obtained primarily from:

- the data subject (student, pupil or course participant)
- application systems such as the Coordinated Enrolment System (KOT)
- public authorities
- previous educational institutions
- MARTEC's internal administrative and learning systems

6 Recipients of Personal Data

Personal data may be disclosed to relevant public authorities and other recipients where required or permitted by law, including:

- The Coordinated Enrolment System (KOT)
- The Danish Ministry of Higher Education and Science (UFM)
- The Danish Agency for Higher Education and Science (UFS)
- The Danish Maritime Authority (SFS)
- Statistics Denmark
- The Danish National Archives
- municipal or state authorities responsible for funding education
- other educational institutions in case of transfer
- internship providers where relevant
- law enforcement authorities where required

Personal data may also be shared internally with relevant employees who require access to perform their duties.

7 International Transfers

MARTEC generally processes personal data within the **European Economic Area (EEA)**.

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If personal data is transferred outside the EEA, such transfers will only take place in accordance with Chapter V of the GDPR and subject to appropriate safeguards.

8 Retention of Personal Data

Personal data is retained only for as long as necessary for the purposes for which it was collected and in accordance with applicable legislation.

Certain records must be transferred to the **Danish National Archives**.

Information necessary for issuing diplomas and certificates must be retained for **30 years** pursuant to the Executive Order on Examinations in Maritime Education.

Accounting records are retained for **five years** in accordance with the Danish Bookkeeping Act.

Other personal data will be deleted when it is no longer necessary.

9 Rights of the Data Subject

Under the GDPR, you have the following rights:

- the right to be informed about the processing of your personal data
- the right to access your personal data
- the right to rectify inaccurate personal data
- the right to erasure in certain circumstances
- the right to restriction of processing
- the right to object to processing
- the right to data portability in certain circumstances

Requests relating to these rights may be submitted to MARTEC.

10 Withdrawal of Consent

Where processing is based on your consent, you may withdraw your consent at any time.

Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.

11 Right to Lodge a Complaint

You have the right to lodge a complaint with the **Danish Data Protection Agency (Datatilsynet)** if you believe that MARTEC's processing of your personal data does not comply with applicable data protection legislation.

More information is available at:

www.datatilsynet.dk

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12 Security of Processing

MARTEC implements appropriate technical and organizational measures to ensure a level of security appropriate to the risk.

These measures include:

- antivirus protection on IT systems processing personal data
- regular backups of IT systems
- restricted access to personal data
- encryption of data transmitted via MARTEC's website
- data processing agreements with suppliers processing personal data on behalf of MARTEC
- staff training and awareness programs
- risk assessments of systems processing personal data

13 Contact Details

Data Controller

MARTEC

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9900 Frederikshavn

Phone: +45 9620 8888

Head of Administration

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