

Data protection policy

The Doctoral Student Ombudsman

Introduction

The DOMB offers advice and support to doctoral candidates at Lund University, and operates under a duty of confidentiality. The DOMB will not disclose to anyone that you have been in contact, or what has been discussed, without your consent. The DOMB will not take any action concerning your case without your consent. This is subject to the terms and the exceptions detailed below.

This data protection policy was approved by the Board of LDK at its meeting on 20 October 2023, and decided by the Governing Assembly of LDK at its meeting on 24 November 2023.

Definitions

“Doctoral Student Ombudsman” or “DOMB” may refer to:

- a service provided by LDK, in collaboration with TLTH and LUS, offering advice and support to doctoral candidates at LU; or
- one or more persons employed by LDK to deliver that service.

In this document, where necessary to avoid ambiguity, the former is referred to as the “DOMB Service” and the latter as the “Ombudsman”.

LDK is Lunds doktorandkår (the Lund Doctoral Student Union), Sandgatan 2, 22350 Lund.

LDK is governed in accordance with its Statutes by the Governing Assembly and the Board. The Governing Assembly elects a Director of External Affairs, a Director of Internal Affairs and a Chief Financial Officer, who together constitute the Presidium of LDK. The Governing Assembly also elects Auditors.

TLTH is Teknologkåren vid LTH (the Union of Science and Engineering Students), Sölvegatan 22A, 22362 Lund.

LUS is Lunds universitets studentkårer (the Lund University Student Unions), Sandgatan 2, 22350 Lund.

LU is Lunds universitet (Lund University), Box 117, 22100 Lund.

The DOMB Service is supported financially by Lund University, but is managed independently.

Provision of the DOMB Service involves the processing of personal data. For the purposes of this document, any instance of a person receiving advice or support from the DOMB is termed a “case”, and that person is termed the “data subject”.

Processing of personal data

Personal data are stored on encrypted electronic storage, or on paper stored in a locked cabinet. Electronic storage may include third-party services, covered by data processing agreements to ensure that the handling of personal data complies with applicable regulations.

Personal data processed may include: name, contact details, data about the person's relationship to LU (such as: admission to studies or employment), data about personal circumstances in relation to the person's activities at LU, and any other data received by the DOMB in the course of a case.

Personal data processed may include sensitive data, such as ethnic origin, sexual orientation or trade union membership, where this is necessary for the purpose of delivering the DOMB Service (for example: assisting a doctoral candidate who has been a victim of discrimination).

Data controller

The data controller is Lunds doktorandkår (LDK).

Any queries about the processing of personal data should be directed in the first instance to the Ombudsman (domb@ldk.lu.se), and in the second instance to the Director of Internal Affairs (di@ldk.lu.se).

Purpose and legal basis of data processing

Personal data are processed as necessary:

- for the provision of the DOMB Service, and
- to ensure the safety and quality of that service.

Personal data are processed on the basis that:

- processing is necessary for the performance of services requested by the data subject,
- processing is necessary for compliance with a legal obligation to which the controller is subject,
- processing is necessary in order to protect the vital interests of the data subject or of another natural person,
- processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller, or
- processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party.

“Legitimate interest” here refers to the main role of student unions as defined in the Higher Education Act (*högskolelagen* 1992:1434), chapter 4, section 9, namely: to monitor and participate in the development of education and study conditions at the higher education institution.

Recipients of personal data

Personal data are received and processed within LDK by the Ombudsman. Personal data are not transmitted to anyone else within or outside LDK, with the following exceptions.

Personal data may be transmitted by the Ombudsman to any other person with the consent of the data subject (for example: if the Ombudsman is asked by the data subject to make representations to LU on the data subject's behalf).

Personal data may be processed by the Presidium, the Board or the Auditors of LDK only where this is strictly necessary to ensure the safety and quality of the DOMB Service, to perform their duties toward the Ombudsman as employer (for example: to ensure a safe work environment), or to comply with legal obligations.

Personal data may be disclosed to the Presidium of LDK, to LU, or to appropriate external authorities in emergency situations (for example: alerting LU staff to a threat of violence, or alerting emergency services to an imminent suicide attempt).

Anonymised data may be processed by any person within LDK, and may be published or made available to persons outside LDK. This includes the publication of anonymised case statistics.

Data retention

A case is considered "open" from the time when it is initiated and for as long as the provision of advice and support is ongoing. Once the matter is resolved and no further advice or support is being provided, the case is considered "closed".

A closed case may be reopened. A case that has been dormant for six months or more is considered closed.

Personal data are retained for as long as a case is open, and for at most 18 months after the case is closed. Thereafter personal data are either destroyed, or anonymised by removing all personal identifiers. Anonymised data may be retained indefinitely.

Right to access

The data subject has a right to request from the controller access to and rectification or erasure of personal data, or restriction of processing concerning the data subject, or to object to processing, as well as the right to data portability.

Supervisory authority

The data subject has the right to lodge a complaint with Integritetsskyddsmyndigheten, Box 8114, 10420 Stockholm (imy@imy.se).