

Privacy Statement



September 16, 2026

1 Introduction

In this privacy statement, Study Association Sticky (hereinafter: Sticky) explains which personal data we collect, for what purposes, and how we handle it carefully in accordance with the General Data Protection Regulation (GDPR). Sticky reserves the right to amend this privacy statement at any time. The most current version can be consulted via our website (<https://www.svsticky.nl/>).

Please note: This privacy statement is available in Dutch and English. In the event of any conflict, discrepancy, or ambiguity between the two versions, the Dutch version shall prevail.

1.1 Contact Details

Association: Study Association Sticky

Address: Princetonplein 5, room 2.81, 3584 CC Utrecht

CoC number: 30220729

Privacy Contact Person: One of the IT board members is internally responsible for privacy and oversees system access rights, retention periods, and data deletion.

Email address for privacy questions: privacy@svsticky.nl

Website: <https://www.svsticky.nl>

2 Personal Data and Legal Bases for Processing

Sticky processes personal data because you make use of our services and/or because you provide these details to us yourself. Below you will find an overview per legal basis and the corresponding purpose:

2.1 Performance of a contract (Membership)

- **Member administration:** Full name, date of birth, address details, telephone numbers, email address, student number, and study progress.
 - *Purpose:* registration, membership management, and formal communication.
- **Membership verification:** Student numbers and studies for verification with Utrecht University.
 - *Purpose:* verifying compliance with the membership conditions in the Internal Regulations.
- **Financial processing:** IBAN and transaction history.
 - *Purpose:* collection of membership fees, payments for activities, and purchase of study materials.
- **System access (Koala):** Login details and registration statuses.
 - *Purpose:* facilitating account management and participation in association activities.

2.2 Legitimate interest

- 35 • **Weekly association newsletter:** Email address.
 - *Purpose:* keeping active members informed of upcoming activities, academic matters, and association news (opt-out via unsubscribe link at the bottom of every email).
- **Mongoose Terminal:** Logs of transactions and purchases.
 - *Purpose:* inventory management, cash audits, and internal association administration.
- 40 • **Atmospheric impressions and photos (Internal):** Visual material of activities.
 - *Purpose:* recording the history of the association on closed member platforms and in association magazines (opt-out: photos are removed upon request via `privacy@svsticky.nl`).
- 45 • **Social Media Publication (General atmosphere):** Overview photos of public events on channels such as Instagram and the website.
 - *Purpose:* promotion of the association and recruitment of new members (objection/removal possible at any time via `privacy@svsticky.nl`).

2.3 Consent (Opt-in)

- 50 • **Partner and career newsletters:** Email address and career markers.
 - *Purpose:* providing information about vacancies, in-house days, and offers from sponsors and partners (exclusively after explicit opt-in upon registration or via account settings).
- **Targeted portraits and featured media:** Specifically recognizable photos or videos of individual members on public channels.
- 55 – *Purpose:* targeted promotion and interviews (prior consent required).

2.4 Legal obligation

- **Fiscal retention obligation:** Financial transaction data and invoices.
 - *Purpose:* complying with the statutory retention period of 7 years for the Dutch Tax Authorities (Belastingdienst).

3 Retention Periods, Alumni, and Anonymization

Sticky does not store personal data longer than is necessary to realize the purposes for which they were collected, unless a statutory retention obligation applies.

3.1 Alumni and Archive Registration

65 Based on **consent** to maintain a connection with former members and association history, the following data is stored in our alumni database **as long as the consent applies**:

- First and last name
- Email address (for alumni updates and reunions)

- Study program(s), graduation year, and period of membership
- 70 • Board and committee positions held
- Historical participation in activities

3.2 Verification and Withdrawal of Consent

Upon termination of membership, members are informed about inclusion in the alumni database. To ensure that the data remains current and consent remains in force, registered alumni **annu-**
 75 **ally receive a notification email** containing an overview of the stored data and the opportunity to directly view, change, or withdraw consent.

3.3 Deletion of remaining data & Anonymization

- **Deletion period (1 year):** Data that is not necessary for the alumni network (such as address, telephone number, IBAN, and specific Mongoose purchase history) is deleted no
 80 later than **1 year** after termination of membership (except for the 7-year fiscal retention obligation).
- **Anonymization:** After expiration of the retention period, data is either erased or anonymized for historical/statistical purposes (such as membership numbers per year).

4 Cookies

85 Sticky exclusively uses **functional and technical session cookies** on its websites and web services (including Koala).

- These cookies are strictly necessary for the functioning of the website, such as secure login and tracking active user sessions.
- Sticky uses **no tracking cookies, marketing cookies, or third-party analytical cookies.**
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- Because exclusively functional cookies are placed that do not infringe on privacy, no prior cookie consent (cookie banner) is required by law.

5 Automated Decision-Making

95 Sticky **does not** make use of automated individual decision-making or profiling (as referred to in Article 22 GDPR) that could have legal consequences for the data subject or significantly affect them. All decisions regarding memberships, admissions, or activities are made with human intervention.

6 Sharing Personal Data with Third Parties

100 Sticky does not sell your data to third parties. We conclude a **data processing agreement** with processors who process personal data on our behalf to ensure the same level of security and confidentiality.

Processors and service providers used by Sticky include:

- **Hosting & Server management:** Hetzner, Amazon Web Services (AWS)
- **Email & Communication:** Google Workspace, Mailchimp, Mailgun

- 105 • **Financial administration:** Mollie, Exact Online

Transfers outside the European Economic Area (EEA) take place exclusively under safeguards deemed appropriate, such as the EU-U.S. Data Privacy Framework or Standard Contractual Clauses (SCCs).

7 Internal Access and Security

- 110 Access to your data within Sticky is strictly limited to officials who need it for their specific tasks:

- **Board:** Full access for the execution of daily management.
- **IT-Crowd:** Access to IT systems subject to a signed confidentiality agreement.
- **Audit Committee (Kascommissie):** Controlled access for audit and advisory tasks.

115 8 Your Privacy Rights

As a data subject, you have the following rights under the GDPR regarding your personal data:

- Right to **access** the data we process about you;
- Right to **rectification** and completion of incorrect or incomplete data;
- Right to **erasure** of data (the “right to be forgotten”);
- 120 • Right to **restriction of processing** (for example during the assessment of an objection or rectification request);
- Right to **data portability**;
- Right to **object** to processing based on a legitimate interest;
- Right to **withdraw previously granted consent at any time**;
- 125 • Right to lodge a complaint with the supervisory authority, the **Dutch Data Protection Authority (Autoriteit Persoonsgegevens)**.

Requests can be submitted via privacy@svsticky.nl and will be answered within **1 month** of receipt.