

Guidelines for students at DMJX on the processing of personal information in connection with teaching, study, and examination activities.

These guidelines contain information for students at DMJX on good practice in the processing of personal data in connection with teaching, study, and examination activities. The guidelines apply to both full-time and part-time students, and participants on courses.

When personal information is processed as an element of teaching, study, and examination activities at DMJX, the processing is encompassed by the general rules and requirements in the data protection regulation (GDPR), and the processing must therefore be in compliance with these rules. This does not apply when students, as part of their studies, work with a journalism product which is published in the mass media. In this case, data processing is exempted from the GDPR pursuant to the Danish Data Protection Act s.3. Even if your activity is encompassed by the journalist purpose exemption, you must still be aware of data security.

Personal information means any form of information that directly, or indirectly, can identify a physical person. For example, a name, CPR number, localisation data, personal picture or portrait, voice, journal, and medical information, fingerprints, tissue samples and other elements that are particular to an individual's physical, physiological, psychological, genetic, financial, cultural, or social identity. At a media and communication school like DMJX, a great deal of personal information is included in the school's teaching and study activities. For example, in the form of photographs, video and audio recordings, interviews, digital products, questionnaire surveys, and research interviews etc.

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Processing means any activity that personal information is subject to, for example, collection, registration, organization, systemization, storage, modification or change, recovery, search, use, transmission, communication, collation, deletion, and destruction. This means that everything you do with personal information is covered by the processing requirements.

Here are **10 good recommendations** for how you, as a student, can ensure that your processing of personal data during your studies is in accordance with the rules and good data processing ethics:

1. Be aware that when you work with information on other persons you are processing personal information. As a starting point, you may only, as set out above, process personal information if the individual has given consent, and the processing is in accordance with the general rules and requirements in the data protection regulation.
2. When you **collect personal information** – for example, when you record video and audio, interview sources and others, collect information from questionnaire surveys, or by inviting responses to postings on social media, or register information on individuals for later use and similar – you must have **consent from the person**.

As far as is possible, all work should be by **written consent**.

Be particularly conscious of the information concerns an individual who is not able to give valid consent because of illness, disability, substance abuse, or age. Here,

consent must be given by someone who can act on their behalf. According to Datatilsynet, a child of 15 will normally be considered to be sufficiently mature to give consent on their own behalf. For younger children, there should normally be consent from the person who has parental responsibility.

It is important that the person is aware **how, and for long, the information will be processed**, and if you are considering publishing your product the person must give consent. Consent will also be required in specific situations, for example, when the person has been informed the information collected is for an article, a survey, an exhibition etc.

3. If you process personal information that is **necessary to pursue legitimate interests**, then consent from the person is not required to collect and process personal information. There can thus be another legal data processing basis than consent. In connection with study activities this will however be the absolute exception and you should be extra thorough in ensuring that your data processing is legal.
4. You must never collect more information on a person than you need. If it turns out that you have collected more information than you need you must delete it again.
5. When you collect and process personal data it must be through the use of **approved hardware and software**. The list can be found on Studieservice. If, as a student, you use non-approved hardware or software this could constitute a data breach which, depending on severity, could be sanctioned under the data protection rules.
6. You must always use **your dmjx.dk mailbox**, when you send or receive mails that contain personal information. When you save and edit personal information, for example, photographs, video and audio recordings, digital products, surveys etc., you must use **approved hardware and software**. See point 5.
7. It is recommended that you have your equipment **encrypted** if you process confidential or sensitive personal data. You can obtain help and guidance here: helpdesk@dmjx.dk.
8. As a starting point, you must not process **sensitive personal information** on other persons unless consent has been given. This could be information on race or ethnicity, political, religious, or philosophical conviction, or trade(labor) union connections, and processing of genetic data, biometric data, health information or information on a physical person's sexual relations or sexual orientation.
9. You must **delete collected personal information** as soon as you no longer need it. It depends on the situation when there is no longer a need to save collected personal information, but information must be stored securely until it is deleted.
10. If there is a **breach of security** of the personal data you process, it must be reported to the school on a special form which you can find here <https://www.dmjx.dk/om-dmjx/kontakt/gdpr-og-persondatabrud>. It is important that you inform the school immediately if you, for example, lose equipment containing personal data or unintentionally give unauthorised persons access to personal information in your

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possession, or if inadequate security leads to unauthorised persons obtaining access to personal data.

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