



Noroff School of Technology and Digital Media’s Privacy Notice

This Privacy Notice describes what information we at Noroff collect about you (our student, potential student or website visitor), how we process your personal data and to whom we pass your information onto. It includes your rights and how you can enforce these rights, and how to contact us.

This privacy notice covers all the companies under Noroff Holding, namely Noroff Education, Noroff Vocational, Noroff University College and Noroff Accelerate. Noroff is a subsidiary of Galileo Global Education.

This notice is continuously updated. Current version 1.1 – 28 July 2021.

This privacy notice will cover:

- Who is responsible for processing your personal data?
- What data do we need and why?
- Where do we send and store your personal data, and how long is it stored?
- Your rights

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1. Responsible for processing

Noroff's CEO is responsible for controlling your personal data and assuring it will be processed in accordance with the GDPR regulations and the Personal Data Act. We delegate some processing activities to relevant external processors, as listed in Section 4. Noroff's company details are specified below.

Noroff's contact details are:

Address: Tordenskjoldsgate 9, 4612 Kristiansand

Organisation Number:

- Noroff Holding AS 915662641
- Noroff Education AS 992191724
- Noroff Fagskole AS 989527479
- Noroff University College AS 997731859
- Noroff Accelerate AS 922742707

Who can I contact?

Contact our Data Protection Officer, Yoland Irwin, [here](#)

Telephone: +47 38 00 00 00

2. How we process student data

Noroff processes your personal data to fulfil the obligations you require from us in relation to being an applicant, registered candidate or student at Noroff. Noroff has educational offers at the Short Courses non-accredited level with Accelerate, Diplomas at the Vocational NQF level 5 and Degrees at the University College NQF level 6. As such we comply with the activities described in the Vocational Education Act, and the Universities and University Colleges Act. NOKUT approves the credit bearing education offered by Noroff, and our Quality Assurance Systems require contact with the Alumni of the educational institutions.

2.1. Data required to consider your application for studying at Noroff

When you apply to Noroff, we require your information to fulfil the institution's tasks and obligations pursuant to the Act relating to Universities and University Colleges and The Vocational Education Act. The processing occurs to protect your interests as a student in the best possible manner and to fulfil our student contract with you.

The purpose of this processing is to:

- process your application for admission to studies/exams/courses

We require the following categories of personal data from you in order to consider your application to Noroff:

- name (first and last name)
- email address
- nationality
- home address, postal code and city
- country of Residence
- mobile number and country code

- date of Birth
- gender (legal gender in civil registry)
- admissions criteria you have to apply
- previous grades
- previous diplomas (if applicable)

The legal bases for processing this data are the GDPR Article 6 (1) letters (b) (the processing is necessary to fulfil our agreement with you) and letter (f) (Noroff has a legitimate interest in contacting you to follow up should you not accept the offer of studies immediately). In certain cases, the institution processes your data on the basis of your consent under GDPR Article 6 (1) letter (a). This consent can be withdrawn at any time as described in [Section 5](#).

If you do not take up studies at Noroff, we can anonymize your data if you request this from us directly.

2.2. Data required to administer your studies at Noroff

2.2.1. Administering your profile in our Customer Relationship Management System

We maintain a profile account for you in our Customer Relationship Management system. Personal data collected for any specific purpose may not be reprocessed for other purposes without the consent of the data subject.

The purpose of this processing is to:

- conduct necessary administration regarding your studies
- document your educational results
- post you your diploma on completion
- archive your student information
- add you to the alumni register
- conduct research relating to education and learning

We require the following categories of personal data from you in order to administer your profiles in our Customer Relationship Management System.

- name (first and last name)
- email address (both personal email and your student email address)
- nationality and residence
- home address, postal code and city
- country of Residence
- mobile number and country code
- date of Birth / Norwegian Fødselsnummer if applicable
- gender (legal gender in civil registry)
- grades
- photo
- courses registered for each academic year
- assessments submitted
- examination attempts
- grades received
- disciplinary notes e.g. for academic misconduct
- activity logs on the Learning management system
- additional information that could be stored includes:
 - any notes made about absences (we do not store health data which is classed as Special Category Personal Data)

- any notes about facilitating special needs
- email correspondence linked to your student file

The legal basis for processing this personal data is the legal obligation as laid out in the schools regulations, GDPR Article 6 (1) letters (b) (the processing is necessary for administering our agreement with you), and letter (c) (Noroff has a legal obligation to provide higher education and related activities under the Act relating to Universities and University Colleges § 4-15, and the Regulations on vocational education at Noroff Vocational School).

Data is never deleted, but archived for storage when you complete your studies, or deregister from your studies with us.

2.2.2. Invoicing students

We email out your student fee invoices once a semester, and load them onto your “My Page”. If you are taking an Accelerate short course, this happens once your course commences.

The purpose of this processing is to:

- Provide you with an invoice for fees, as relates to the contract that you have signed with Noroff
- Storage of the invoice in your student profile, for reference

The legal basis for processing this personal data is GDPR Article 6 (1) letter (b) (the agreement between the school and the student / candidate).

The invoicing information will be stored for the 3.5 years after the end of the financial year of graduation, as required by the Accounting Act.

2.2.3. Processing applications relating to special requirements

If you have any special needs as a student, for example an extenuating circumstance requiring deferred examination, we will process the data you provide to us when we handle your special needs request. If you have a special requirement which needs to be addressed, please email utdanning@noroff.no (for Vocational) or education@noroff.no (for NUC). Any specific health data will not be stored.

The legal basis for processing this personal data is GDPR Article 6 (1) letter (b) (the processing is necessary for administering the information Noroff has with you as a student) and GDPR Article 9 (2) letter (b) (Special categories of Data as required by University and University Colleges Act § 4-3 (5) and The Vocational Education Act Section 15).

Data is never deleted, but archived for storage when you complete your studies, or deregister from your studies with us.

2.3. Data required for your file on the Student Information System (NUC)

Noroff University College uses FS ([Felles Studentsystem](#)) for students' study administrative data. If a Norwegian educational institution has made a decision on sanction (s) for you that also has an effect on your applicant / student relationship at other Norwegian educational institutions (pursuant to the Universities and University Colleges Act sections 3-7 (8), 4-8 (1) to (3) or 4-10 (3)), Noroff will through RUST receive personal information about you. Only a few selected people at Noroff will have access to this personal information. You can view the privacy statement for [RUST](#).

The following personal information is processed in FS:

- profile information (such as your name, birth number / D-number / S-number (11 digits))
- gender
- contact information
- information about your background
- preferred language
- photo
- application information including videregående grades / school exiting grades
- prior education
- student grades
- any transfer credits or RPL processes
- consent you provided
- status (such as residence permit where relevant)
- semester registration information
- previous course grades
- and information about studies and courses.

The legal basis for processing is GDPR Article 6 (1) letter (c) (this data is necessary for compliance with Universities Act § 4-15 and The Vocational Education Act § 41).

All data inputted into FS will remain stored. Nothing is deleted as this is the permanent archive of credits achieved with Noroff, and Diplomas generated.

2.4. Data required for your profile on the Learning Management System (LMS)

We use Moodle as our Learning Management System, which integrates with other processors namely Zoom, TurnItIn and GitHub Classroom. Moodle is an online platform where you login to see your course information, lectures are presented for online students, tutorials are loaded up and assessments are conducted.

Moodle requires the following categories of personal data:

- your first and last name
- email addresses
- unique salesforce identifier
- logs of attendance
- assessment submissions
- IP address used for connecting in
- grades

You have the option of storing hometown and country information as well as a profile photo. Your online class attendance (or absence) is monitored manually through looking at log files. If you are found to not be participating in the courses, a note is made.

The legal basis for processing this personal data is GDPR Article 6 (1) letter (b) (the agreement between the school and the student) and letter (f) (Noroff has a legitimate interest to assist the student to perform optimally).

The data in Moodle becomes inaccessible to students when the course is finished, but it is not deleted. The courses are archived.

2.4.1. LMS Log data

We monitor your student activity through the use of all system logs relating to education activities. This includes timestamped logs, IP addresses, locations, course and site activity, event context, and

users involved, and which platform website or mobile app was used. Live monitoring of the engagement with the Moodle site can be done at any time including during assessments. This can inform monitoring of engagement, participations, and all system events on the site. Students after a period of non-engagement can be followed up upon by Education. This data can also be used forensically to assess for academic misconduct.

The legal basis for this processing is GDPR Article 6 (1) letter (f) (Noroff has a legitimate interest to process this data to assist in multiple areas to improve student experience and inform academic quality assurance processes).

This data is stored as part of Moodle and will not be deleted for the time that the course in Moodle is stored.

2.4.2. Managing student attendance

At Noroff we strive to allow you to achieve your best grades. As such we monitor your student attendance through Moodle. For this purpose we process the following:

- Student log data on Moodle relating to logging in, lectures viewed, downloaded material, tutorials completed, assessments completed

Any special category health data shared with us will not be stored.

The legal basis for processing this personal data GDPR Article 6 (1) letter (b) (the agreement between the school and student) and letter (f) (we have a legitimate interest to check student engagement in courses and follow up on students not attending and assist where possible).

This data is stored as part of Moodle and will not be deleted for the time that the course in Moodle is stored.

2.4.3. Grading of Student work

You use Moodle to upload your assessment submissions and have your assessments graded by academic staff. This can be in a formative manner (no grade, but might still be a compulsory activity) or summative manner (grade given and might be compulsory activity). Feedback on the assessment could be communicated through Moodle, or through an alternative channel like Teams for oral discussions. When your grade is transferred to FS or Salesforce, your National Identity number is required. Also see [section](#) about sharing of grades with third parties.

We, as the controller of this data, need to be legally compliant to record your grades. The legal basis of processing this data is GDPR Article 6 (1) letter (c) (University and University Colleges Act and the Vocational Education Act).

This data is stored as part of Moodle and will not be deleted for the time that the course in Moodle is stored.

2.4.4. GitHub classroom

For some courses, GitHub classroom is integrated into the LMS. You will share your code from your personal Github account, by providing a link through Moodle. Github requires the following personal information from you:

- your email address
- username and password
- cookie information from their website
- device information

GitHub is the controller of this data, and you can read more about how they process your personal data by reading their [Privacy statement](#).

2.5. Communications and storage

2.5.1. Office 365 Profile

We provide you with an Office 365 Student licence and student email address. This grants you access to online Outlook, OneDrive and Microsoft Teams, as well as the online Microsoft suite of apps. We disclose the following personal data to Microsoft:

- name
- email address
- degree program or fagskole program
- campus location or online
- current year of study
- for password recovery, your private email and private phone number will be required

You can choose to upload your photo to your Microsoft profile.

The legal basis for processing this data is GDPR Article 6 (1) letter (f) (Noroff has a legitimate interest to ensure that students have a reliable storage facility for their work, and the tools to execute it).

Your office 365 profile and email address are deleted 30 days after you deregister or graduate.

2.5.2. Storage of Student work

We offer you storage facilities for your student related work. We require the following categories of personal data from you for storing your work:

- name
- telephone number
- email address
- student work which could include:
 - presentations and Slides
 - papers
 - media files
 - code
 - assessment submissions
 - portfolios

Your uploaded submissions are stored on Moodle, and possibly TurnItIn. Other storage includes your personal OneDrive, Vimeo for larger video files, and GitHub for code.

The legal basis for processing this data is GDPR Article 6 (1) letter (f) (Noroff has a legitimate interest to ensure that your student work is stored during the assessment stage, and to offer you a secure storage solution in OneDrive).

Your OneDrive is deleted 30 days after you deregister or graduate.

2.5.3. Academic Communication

We use Email, SMS, and Microsoft Teams as the official communication methods.

We require the following categories of personal data from you:

- name
- telephone number
- email address

The legal basis for processing this data is GDPR Article 6 (1) letter (b) (we process this data to fulfil the contractual agreement between you and Noroff) and letter (f) (we have a legitimate interest to make sure that all students know what is being communicated and to provide students with platforms where they communicate during their studies).

Email and SMS's sent to you as an individual are retained on your student profile. Microsoft Team data is deleted 180 days after inactivity.

2.6. Marketing Student Survey

We would like feedback from our newly registered students, to find out how you heard about Noroff and which marketing means were influential in your decision to register here. We require the following categories of personal data from you:

- name
- phone number

You are sent an SMS with a link to the Marketing survey.

The legal basis of processing this data is GDPR Article 6 (1) letter (f) (we have a legitimate interest to have feedback on our marketing practices).

The data generated from the survey is anonymous, and stored on the survey platform, and downloaded to the Office 365 cloud servers for further processing.

2.7. Library, Computers and Equipment loans on Campuses

We have equipment, computers and books specific to various courses or degree programs on the different campuses. If you loan equipment or literature for a specific task, we require the following categories of personal data which links in with the Cheqroom system:

- name
- personal email address
- phone number

The legal basis for processing is GDPR Article 6 (1) letter (f) (we have a legitimate interest to provide the full educational experience and to have a record of who borrowed what, allowing for retrieval of the equipment or book).

Your personal data can be deleted on request by following the procedure in Section 5.

2.8. Alumni

Data you supply to us when you are a student will remain stored for future use as part of our Alumni register.

The personal data we process for this purpose is:

- your name
- contact details (email, phone number, address)
- course you studied and when

Should your contact details change with time, please inform us so that we can rectify your information in your profile account. We have an Alumni database where we can communicate with you, and share information, as well as surveys for you to complete, if you wish, to help in our quality assurance process.

Should you wish to not be contacted, please [email us](#) to remove you from the communications list or click on the unsubscribe option in the emails.

The legal basis for processing this data is GDPR Article 6 (1) letter (f) (we have a legitimate interest to keep a record of our Alumni. We can ask our alumni to contribute to the Quality Assurance Systems at Noroff as we have a general legal obligation to work continuously with increasing the quality of our educational offers, and to have students contribute to such assessments (section 2-1 in the Regulation on Quality Assurance and Quality Development for Higher Education and Vocational Education). Specifically mentioned in this provision is ensuring that students participate in the quality assessments. Although you as Alumni are not *students* per say, you can offer huge value from your recent education experience and being newly employed practitioners in the job market).

Your alumni data cannot be deleted, but should you wish to not be contacted, please contact us directly.

2.9. Noroff Accelerate Specific notices

2.9.1. PearsonVue testing center

PearsonVue requires personal data, which you can view in their [privacy policy](#).

Data no longer required (for example camera footage) is deleted 60 days after your test date.

2.9.2. CISCO training courses

CISCO requires personal data, which you can view in their [privacy policy](#).

2.9.3. Kryterion Global testing solutions

Kryterion requires personal data, which you can view in their [privacy policy](#).

3. How we process data regarding you as a visitor to our campuses or website

3.1. Camera surveillance

We have camera surveillance for the public spaces on our campuses in Oslo, Kristiansand, and Bergen. This monitors everyone who visits our campuses (employees, students, cleaning personell, janitors or any visitors). The cameras are not monitored in real time, but the recordings are stored locally and used in crisis situations or where criminal activity is suspected. There are notices to indicate that the premises are monitored using camera surveillance at the entrances. The recordings will be handed over to emergency services if required.

The legal basis for processing is GDPR Article 6 (1) letter (f) (we have a legitimate interest to prevent and resolve illegal incidents).

Camera recordings are deleted after 7 days unless required for an investigation.

3.2. Access control to campuses

We have access control on Noroff Campuses in Kristiansand, Oslo, Bergen and Stavanger. The access control system has active integration with active directory, where your personal data is stored. The following personal data is required for the access control system to work:

- name
- email address
- groups you are linked to in Microsoft Active Directory

Oslo uses the system Esmi, with onsite server storage.

Kristiansand uses the system Openpath with cloud storage.

Additionally, you will need the Openpath mobile app on your phone. You can gain entry through the phone's Bluetooth connection with a receiver, or through the app and Openpath cloud using 4G or Wi-Fi.

The access control system uses real time monitoring of access through doors and the audit trail stores an ongoing log of all confirmed access in order to support forensic investigation of any incidents and uses encrypted end-to-end communication with the cloud storage. We will hand over access control logs to emergency services if required.

The legal basis for processing is GDPR Article 6 (1) letter (f) (we have a legitimate interest to control the access onto campuses and to limit access to certain rooms on campus, for safety and security of personell and assets).

Kristiansand access control data logs are deleted after 2 years.

Oslo access control data logs are deleted after 6 months.

3.3. Marketing

3.3.1. Information sharing on the website

We share news, marketing information and course information on our website www.noroff.no. Personal data might include the following categories:

- information about data subject interviewed
 - names
 - photos
 - viewpoints

The legal basis for process is GDPR Article 6 (1) letters (a) (consent of the data subject) and letter (f) (we have a legitimate interest in showcasing newsworthy stories, and course offerings on the website). Consent can be withdrawn at any point of time by following the process outlined in the [Rights of the data subject](#).

The articles are not deleted, and form part of the history archive within the website when newer articles replace them.

3.3.2. Photo bank

Once a year, we take photos and videos on campus specifically for marketing purposes in the following channels:

- Noroff website

- Noroff news articles
- Digital marketing (e.g. Facebook and partner networks, Instagram, Google Display Network, Snapchat LinkedIn, Twitter, YouTube)
- Offline marketing efforts (e.g. brochures)
- Press releases (e.g. Mynewsdesk and news media)
- International portals (e.g. Studyportals, Keystone Academics)

The legal basis for processing this personal data is GDPR Article 6 (1) letters (a) (consent is collected from the data subjects prior to photos being taken) and letter (f) (Noroff has a legitimate interest in collecting suitable digital media which can be used for advertisements, news stories, campus views and general marketing, and has collected the consent of the individuals involved).

The photos are stored for 3 years, after which they are deleted. If you are in a photo being used in digital media (not print), and you want to withdraw your consent, you have the right to do so. Follow the procedure outlined in the [rights of the data subjects](#), and include all the information about which photo you are in and where it is published.

3.3.3. Pardot

Our website sets Pardot cookie, a personalised tracking cookie, into your browser. Anonymous visitors are only turned into identifiable contacts when they become registered students or sign up for our newsletter.

Personal data collected by the cookie setting from website visitors are:

- visitor activities
 - click path information while using our website

Pardot cookie does not store personally identifying information, only a unique identifier.

The legal basis for processing this personal data is GDPR Article 6 (1) letter (a) (consent to the use of cookies on our website) and letter (f) (we have a legitimate interest in monitoring click path behaviour on our website to help influence our website arrangement and accessibility).

See the [Cookie policy](#) for more information about Pardot Cookie and deletion.

3.3.4. Facebook

Noroff uses Facebook as a platform to distribute marketing advertisements, as well as for sharing and distributing news and information.

As joint controllers, Noroff and Facebook require the following categories of personal data from you:

- Facebook profile
- behavioural data
- IP addresses
- operating system
- browser type
- language settings
- cookie data

The legal basis for processing this personal data is GDPR Article 6 (1) letter (f) (we have a legitimate interest in marketing advertisement and news sharing).

See the [Cookie Policy](#) for more information about Facebook pixel and deletion.

3.3.5. Facebook Marketing

We use Facebook adverts for targeted marketing. Visitors to our webpage can receive adverts on the Facebook platform.

As joint controllers, Noroff and Facebook require the following categories of personal data from you:

- behavioural data
- IP addresses
- operating system
- browser type
- language settings

The legal basis for processing this personal data is GDPR Article 6 (1) letters (a) (consent to the use of cookies on our website) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about Facebook pixel and deletion.

3.3.6. Communication via Facebook Messenger

We use Facebook Messenger where persons with an interest in Noroff Studies who have a Facebook account, can send a message to Noroff.

As joint controllers, Noroff and Facebook require the following categories of personal data from you:

- your personal Facebook profile
- content of inquiry

The legal basis for processing this data is GDPR Article 6 (1) letter (f) (we have a legitimate interest to offer a simple communication tool).

You can delete (unsend) messages from messenger by holding down the message, and clicking the “more...” option, then press remove, and unsend (removing it from both your messages and who you send it to).

3.3.7. Instagram

Our Instagram page contains marketing photos and videos, and Instagram followers can comment.

As joint controllers, Noroff and Instagram process the following categories of personal data from you:

- profile information
 - name
 - photos
 - videos
 - information shared
- comments made per post

The legal basis for processing this information is GDPR Article 6 (1) letters (a) (consent for the cookie) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about Facebook pixel and deletion.

3.3.8. Snapchat

We use Snapchat for targeted Marketing. Processing of personal data includes the use of the Snapchat pixel tracker on the Noroff Webpage.

Snapchat processes the following categories of personal data from you:

- your behavioural data on Noroff Webpages
- device information
 - phone book
 - photos
 - location
 - cookie information
 - logged information
 - IP address

The legal basis for processing this data is GDPR Article 6 (1) letters (a) (consent to use of the cookie) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about Snap pixel and deletion.

3.3.9. Vimeo

We use Vimeo Business for sharing videos and other relevant content. Personal data processed are:

- Persons interviewed and their options

The legal basis for processing this data is GDPR Article 6 (1) letters (a) (prior consent to being interviewed) and letter (f) (we have a legitimate interest to have a storage location that suits the large media files).

The data stored on Vimeo remains stored while the account is active.

3.3.10. LinkedIn

Our LinkedIn account shares news, information, marketing and other relevant content. LinkedIn processes the following categories of personal data from you:

- data subject interviewed
 - name
 - photos
 - videos
 - information shared

From the LinkedIn cookie

- LinkedIn profile
- behavioural data on Noroff Webpages and LinkedIn
- device information, including logged information and IP address

The legal basis for processing this information is GDPR Article 6 (1) letters (a) (consent to being interviewed, or consent to the cookie) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about LinkedIn cookies and deletion.

The data shared on LinkedIn remains stored, unless you withdraw your consent.

3.3.11. Twitter

Noroff uses Twitter services for targeted marketing as well as sharing news, information, and other relevant content. Twitter processes the following categories of personal data from you:

- Twitter followers
 - Twitter profile
 - re-tweets
 - behavioural data on our Webpage and Twitter
 - device information
 - logged information and IP address
- Marketing information
 - data subjects
 - names
 - photos
 - videos

The Twitter user is the data exporter, and Twitter is the data importer, located in the US.

The legal basis for processing this information is GDPR Article 6 (1) letters (a) (consent of the cookie) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about Twitter cookies and deletion.

3.3.12. Google Ads

We use Google Ads as a targeted marketing platform. Google Ads uses machine learning and tracking technology to offer relevant advertisements. Google controls and processes the following personal information of persons targeted with adverts:

- online behavioural data
- device information

The legal basis for processing this information is GDPR Article 6 (1) letters (a) (consent of the cookie) and letter (f) (we have a legitimate interest in using marketing tools).

See the [Cookie Policy](#) for more information about Google ads cookies and deletion.

3.3.13. YouTube

We use YouTube to share marketing videos. The Noroff channel contains marketing material and short adverts for interested parties to watch. YouTube processes the following categories of personal data from you:

- Interviewed person image and voice

The legal basis for processing this data is GDPR Article 6 (1) letters (a) (consent collected from the interviewed) and letter (f) (we have a legitimate interest in ensuring global visibility of our education).

Videos will remain stored by YouTube as long as the account is active, or until consent is withdrawn.

3.3.14. Other website Cookies

For further information about other functionality and analytical cookies installed in our website, please read our [Cookie Policy](#).

3.3.15. Newsletters and communicating information

If you choose to sign up for a newsletter, or information about studies on our Noroff Webpage we require your explicit consent. We process the following categories of personal data from you (visitors, potential students, current students or employees):

- your name
- contact information

Newsletters or information about studies is sent via email or SMS. There is an unsubscribe option included in every email, or manual opt out can be requested by [emailing us](#).

The legal basis for processing is GDPR Article 6 (1) letters (a) (your consent) and letter (f) (we have a legitimate interest to provide the correct information to anyone investigating studies at our schools).

We delete personal data relating to marketing after 2 years of inactivity; for communications relating to operations, personal data is deleted 6 months after leaving Noroff.

4. Where do we send and store your personal data

4.1. Invoicing Corporates

Noroff generates invoices, on demand, for corporate customers when billing for work done. These are sent out via e-mail. For this purpose, we process the following categories of personal data supplied by the corporate:

- contact person's name
- contact information

Should these details change, please notify us to rectify this information.

The legal basis for processing this data is GDPR Article 6 (1) letter (f) (a legitimate interest to make sure the correct person receives the invoice).

4.2. Staff Recruitment

External vacancies are advertised on our website, recruitment agencies websites and/or targeted information sites suited to the position. If applying through a recruitment agency, they are the data controllers, and data about identified candidates to be interviewed are accessed by Noroff through a secure link sent to us.

Alternatively, for posts where you apply directly to us, we require the following categories of personal information from you in order to consider your application for a vacancy at Noroff:

- name
- contact details
- curriculum vitae
- application form
- degree/diploma/certifications
- attestations

- details of references

All data stored by Noroff during this process is stored for 2 months after the interview date. Any unsuccessful persons have their personal data deleted at this stage, unless they have signed a consent form to have it processed for longer. Any persons deemed successful proceed to having their personal data processed in the same way as all employees.

The legal basis for processing your data is GDPR Article 6 (1) letter (b) (your job application) and GDPR Article 9 (2) letter (b), cf. the Personal Data Act Section 6.

4.3. Noroff's data processors and joint controllers

Noroff is the controller of your data, but we have many external companies which are processing the data. The following is a list of the delegated processors and where they store your data. If they store your data outside the EU, the transfer mechanisms are included.

Processor	Data Storage zone	Hosting	Transfer mechanisms if required
Salesforce / SMS magic / Pardot	EU		n/a
Visma	EU		n/a
Bitpro AS – Microsoft tenant	Norway – O365 servers in EU	cloud	n/a
FS	Norway		n/a
Efaktor AS - Moodle	Norway		n/a
MeetCon - Zoom	Norway		Zoom ensures transfer is governed by the European Commission's standard contractual clauses
TurnItIn	EU cloud servers with data transferred to the US		Transfer using Standard Contractual Clauses
Linkengage	Norway		n/a
Mailchimp	US		Transfers in compliance with the Standard Contractual Clauses
SurveyMonkey	EU – Enterprise package cloud servers		n/a
Neowit	From Norway to Openpath cloud servers located in US to store generated logs		Transferred using Standard Contractual Clauses
Cheqroom	Cloud servers in the US		Their server infrastructure is currently based in the United States and is provided by Amazon Web Services (although servers may from time to time be based in other countries). All our servers and applications run secure protocols, these are same security protocols that banks use to transmit financial data.

PersonVue	Cloud servers hosted in the EU	n/a
CISCO	EU CISCO clouds transfer to the US CISCO clouds	EU Binding Corporate Rules with policies fully aligned to GDPR
Facebook	Joint controllers. EU servers, but transfer to the US happens	Transferred via Standard Contractual Clauses
Instagram	US	Transferred via Standard Contractual Clauses
Snapchat	US	Snap uses Standard Contractual Clauses as its lawful transfer mechanism
Vimeo	US and other countries	Transfer via Standard Contractual Clauses
LinkedIn	US	Transfer via Controller-to-Processor Standard Contractual Clauses
Twitter	US	Transfer via Controller-to-Processor Standard Contractual Clauses
Google Ads	US	Transfer via Controller-to-Processor Standard Contractual Clauses
YouTube	US	Transfer via Standard Contractual Clauses

4.4. Sharing your information with external third parties

4.4.1. Educational sector in Norway

We are required to share your personal information with third parties within the educational sector in Norway. Personal data shared depends on the external party listed below:

DBH (Data Base for Statistics on Higher Education) and **DBH-F** (Database for høyere utdanning og Fagskole) (owned by NSB) act as Joint Controllers and require:

- grades
- points achieved
- student progress
- national ID number
- registered gender

Lånekassen requires:

- grades
- progress of the program (number of credits passed)
- points achieved
- national ID number
- gender

NAV – For students funded through NAV, they require:

- name

- national ID number / fødselsnummer
- progress details
- credits achieved

Student organisations -

Noroff is associated with student organisations in:

- Agder ([SiA](#))
- Oslo ([SiO](#))
- Bergen ([Sammen](#))
- Stavanger ([SiS](#))

There are fees to be paid to the organisations, and processing of personal information by them will occur. The regulations on student organisations can be read [here](#) and the Student Organisation Act can be read [here](#).

Other external parties who receive personal data are:

- Directorate for ICT and Joint Services in Higher Education and Research (Unit)
- The Central Population Register (Folkeregisteret)
- Statistics Norway (SSB)
- Industry partners – students to provide CV to pass on
- UDI requires reports about your progress if they have allowed you into Norway on a student visa with the purposes of completing a qualification
- Experis academy, if you are taking a short course with us through them
- External examiners

The legal basis for processing is GDPR Article 6 (1) letter (c). (We must be compliant to the legal obligation we have to the state third parties as required in the [University and University Colleges Act](#) and the [Vocational Education Act](#)). In addition we must comply with the [National Insurance Act](#).)

This data is not deleted.

4.4.2. Collaborating with other educational institutions

Noroff partners with some Universities which offer accredited courses either during or after studies with us. Our partner universities are [University of South Wales](#), [Teesside University](#), [Deakin University](#) and [AFDA](#), as well as some associated with the [Erasmus + program](#). In addition, you might apply for further education at any other educational institution and require information transferred.

Personal data normally required by other education institutions are:

- your name
- high-school qualifications in English
- grades from videregående / high school
- current grades from Noroff
- identity numbers
- passport information
- diplomas in English
- curriculum vitae

- reference letter or recommendation based on questions the education institution requires answered.

In most cases you will liaise directly with the other educational institution, and we will send the required information, either to you or directly to the institution with your consent. Normally this is uploaded through a secure online portal for the institution or directly emailed with a reference number.

The legal basis for processing of data is GDPR Article 6 (1) letter (a) (when you give us explicit consent to transfer your data) and GDPR Article 9 (2) letter (a) (if you have consented to us processing special category personal data).

4.5. Indirect processing

We also process information about you which we have collected from other sources than yourself in the following situations:

- a complaint contains information about you
- an employee or student has stated you as a next of kin
- a jobseeker has listed you as a reference
- when previously collected personal data is permitted to be reused for research or quality assurance purposes
- we receive information about you from another government agency

5. What are your rights?

As a data subject, you have certain rights associated with your personal data.

5.1. Right of Access

You have the **Right of Access** to your personal information. You have the right to know which of your personal data is stored and processed by Noroff, and if this information is disclosed to others, how long it is stored and if any will be deleted and when. You can read more about this on the [Datatilsynets website](#). Please [email us](#) to request a Data Subject Access Request Form. We will require Photo ID as proof of who you are.

5.2. Right to correction

Should you believe that any personal data we hold on you is incorrect or incomplete, you have the right to request to see this information, rectify it or have it deleted if incorrect. Please [email us](#) to request a Data Subject Access Request Form. We will require Photo ID as proof of who you are.

5.3. Right to erasure

The right to erasure is not absolute. You have the right to have your personal data deleted if the data:

- is no longer necessary for the purpose it was collected or processed for
- was processed with your consent and you have now withdrawn that consent, and there is no basis for further possession.
- if you feel your data is being processed after you have objected to it and Noroff cannot document more compelling reasons as to why the data should be processed.
- the processing has been illegal.

- must be erased in accordance with a legal obligation.

Should you feel this is the case, please [email us](#) to request a Data Subject Erasure Form. We will require Photo ID as proof of who you are.

5.4. Right to restrict processing of own personal data

You may have the right to demand a restriction in the processing of your personal data. This means in practice that your data cannot be processed in any way other than being stored.

You can request limited processing when:

- you believe the personal data is incorrect, during which Noroff must limit the processing during the investigation period.
- if the processing is illegal, while you oppose erasure.
- Noroff no longer needs the data for the purpose for which the data was collected, but the subjects need the data to establish, assert or defend a legal claim and therefore want the data to remain stored until the claim is finally settled.
- you have objected to the processing and are waiting for the request to be processed.

5.5. Right to protest against the processing of personal data

You may protest to Noroff's processing of your personal data if:

- you can document conditions which place yourself in a particular situation which indicates that Noroff shall cease further processing, and
- processing is based on GDPR Article 6 (1) letter (e) or letter (f), including profiling and direct marketing based on these legal grounds.

Should you want to protest against Noroff processing your personal data for the purpose of direct marketing purposes, please unsubscribe from the direct marketing in the next email, or [email us](#) to request this. There are legal reasons why Noroff can reject your protest.

5.6. Complaints about Noroff's processing of your personal data

In the event that you wish to complain about how we have handled your personal data, please [email](#) Data Protection Officer or in writing at Noroff Data Protection Officer, Tordenskjoldsgate 9, 4612 Kristiansand. Our Data Protection Officer will then investigate your complaint and work with you to resolve the matter.

After this, if you still feel that your personal data has not been handled appropriately according to the law, you can contact Datatilsynet and follow their complaints procedure [here](#).

6. Changes to the privacy notice

There may be a requirement to change Noroff's Privacy Notice as a consequence of new or changes in the privacy regulations, or as a result of Noroff changing the way in which we process your personal data. Should this happen, the privacy notice will be updated and published on Noroff's webpage.