



L.S.A. CUSTODIA

Privacy Policy

As adopted by Board VIII on 11.12.2025

Leiden Study Association Custodia (hereafter: “Custodia”, “the Association”, “we”) is committed to protecting the personal data of its Members, Participants, and other individuals who interact with the Association. This Privacy Policy explains how Custodia collects, processes, stores, and safeguards personal data in accordance with the General Data Protection Regulation (GDPR/AVG) and applicable Dutch legislation.

This Policy applies to all processing of personal data undertaken by or on behalf of Custodia.

1. Identity of the Controller

Leiden Study Association Custodia
Turfmarkt 104, 2511 DC 's-Gravenhage, The Netherlands
KvK-number: 74202634
Email: secretary@custodiathehague.com

Data Protection Contact:
Lennart Noah Boes, Secretary & Vice-President of Board VIII

2. Categories of Personal Data We Process

2.1 Membership administration

Mandatory data:
Full legal name
Email address
Home address
Study programme
Bank account number

Optional data:
Phone number
Date of birth
Optional data may be deleted upon request at any time.

2.2 Event participation

For Events, we may process:

Name, email address, phone number, study programme

Attendance / no-show status

Emergency contact details (where necessary)

Only when required by external partners (e.g., embassies, courts, institutions):

Nationality

Passport or ID number

Special category data (processed only with explicit consent):

Dietary restrictions

Event Participant data is deleted within one week after the Event, except:

No-show records: retained for one year in accordance with the Policy Manual (Art. 44).

Dietary restrictions: deleted immediately after the conclusion of the Event.

2.3 Photos and videos

Custodia may create and publish photos and videos for promotional purposes on:

the Association's website,

WhatsApp channels,

Instagram, Facebook, LinkedIn.

Individuals may object to being photographed at any time by notifying the supervising Board Member at the Event. Removal requests for published media will be honoured without undue delay.

For minors, photos are only taken and used with explicit consent from a parent or legal guardian.

Images are retained indefinitely unless removed at the request of the individual or as part of periodic archival review.

2.4 Communications and internal documentation

We process data contained in:

emails sent to and from official @custodiathehague.com accounts,

WhatsApp groups voluntarily joined by Members,

documents and archives (e.g., Board minutes, Committee materials, disciplinary records).

WhatsApp groups inherently display participants' phone numbers, profile names, and potentially profile pictures or "about" information to all group members depending on user settings. Participation in WhatsApp groups is voluntary; Members are never added automatically.

3. Purposes and Legal Bases for Processing

Custodia processes personal data for the following purposes:

3.1 Membership administration

Maintaining the Member registry
Sending newsletters and official communications
General Assembly organisation, including voting eligibility
Collecting membership fees
Fulfilling statutory and financial obligations

Legal bases:

Contractual necessity (Art. 6(1)(b) GDPR)
Legal obligation (7-year retention under Dutch tax law)
Legitimate interest (internal communication and administration)

3.2 Event organisation

Managing registrations and participant lists
Ensuring safety, attendance verification, and logistical coordination
Complying with requirements of external partners
Enforcing the No-Show Policy

Legal bases:

Contractual necessity
Legitimate interest
Explicit consent (dietary restrictions)

3.3 Promotion and communication

Publication of event photos and promotional material
Administration of voluntary WhatsApp groups
Communication with Members about Association activities

Legal bases:

Legitimate interest (promotion of the Association)
Consent (minors; individuals invoking opt-out rights)

3.4 Governance, accountability, and disciplinary procedures

We may process data for internal oversight, including:
handling reports and conflicts (Protocol Chapter 2),
interaction with the Supervisory Board or General Assembly where required,
archiving decisions and procedural documentation.

Legal bases:

Legitimate interest

Compliance with internal regulations

Legal obligation (where applicable)

4. Data Retention

Custodia retains personal data only for as long as necessary for the purpose for which it was collected, subject to statutory obligations.

Membership data: retained for the duration of membership and seven (7) years thereafter in accordance with Dutch tax and civil law.

Optional membership data: deletable at any time.

Event data: deleted within one week; no-show records retained for one year.

Disciplinary records: retained for a maximum of two years, unless a General Assembly appeal is pending.

Emails and internal archives: retained indefinitely unless removed for administrative purposes.

Photos and videos: retained indefinitely unless removal is requested.

5. Data Sharing and Use of Third Parties

Custodia does not sell personal data. Data is only shared when necessary for operational, contractual, or legal reasons.

5.1 Processors

We use the following GDPR-compliant service providers:

Congressus B.V. (EU-based): membership administration, event forms, website

Google Workspace (Google Ireland Ltd.): email, Drive storage, media

→ EU storage with SCCs for US backups

ABN Amro Bank N.V.: financial administration (controller, not processor)

5.2 External partners

For certain Events, personal data (including nationality or passport numbers) may be shared with partner institutions such as embassies or courts, where access requirements mandate it.

5.3 Social media platforms

Meta Platforms Ireland Ltd. (WhatsApp/Instagram/Facebook) and LinkedIn Ireland Unlimited Company act as independent controllers. Their own privacy policies apply.

6. Data Security

Custodia implements appropriate technical and organizational measures, including:

Secure HTTPS website

Role-based access to Congressus and Google Workspace

Two-factor authentication for Board accounts

Confidentiality obligations for Board and Committee Members

Secure physical storage in the Association office

These measures are designed to prevent unauthorized access, alteration, disclosure, or loss of personal data.

7. Cookies

The Association's website uses the cookie framework provided by Congressus, which may include essential, functional, analytics, and marketing cookies.

Users may manage cookie settings through the website's cookie banner.

8. Rights of Data Subjects

Under the GDPR, you have the right to:

Access: request a copy of your personal data

Rectification: correct inaccurate or outdated data

Erasure: request deletion of your data, subject to statutory retention requirements

Restriction: request limited processing in specific circumstances

Objection: opt out of newsletters or object to the use of photos

Data portability: request your membership data in machine-readable form

Withdraw consent: applicable only where consent is the legal basis (e.g., dietary data, minors' photography)

Requests may be submitted to secretary@custodiathehague.com

9. Minors

Members under the age of 18 receive enhanced protections.
Photography or publication of their image requires explicit parental or guardian consent.

10. Complaints

If you believe your data has been processed unlawfully, you may contact us at secretary@custodiathehague.com.

You also retain the right to lodge a complaint with the Autoriteit Persoonsgegevens (Dutch Data Protection Authority).

11. Changes to This Policy

Custodia may revise this Privacy Policy from time to time to reflect legal, technical, or operational developments. Updated versions will be published on the Association's website.