

Legal report issued at the request of the Commission for the Guarantee of the Right of Access to Public Information in relation to the claim against the partial estimate of a university in the request for access to certain information related to the agreements in the framework of educational cooperation

The Commission for the Guarantee of the Right of Access to Public Information (GAIP) asks the Catalan Data Protection Authority (APDCAT) to issue a report on the claim submitted in relation to the partial estimate of a university in the request for access to certain information relating to agreements in the framework of educational cooperation.

Having analyzed the request, which is accompanied by a copy of the administrative file processed before the GAIP, and in accordance with the report of the Legal Counsel I issue the following report::

Background

1. On November 16, 2022, a person submits a letter to a University in which he requests access to a " *reusable file that contains information related to curricular and extracurricular practices from 2014 to the present day, requesting the following columns/information: gender_alumno , code_RUCT , title_student , center_alumno , entity_company , type_entity , hours_weeks , hours_totals , type_practices , credits , ayuda_economica_mes , MesAño_InicioPracticas , MesAño_FinPracticas , información_publicacion . Format : CSV* ".

2. On December 2, 2022, the university decided to partially approve the request for access to public information made by the applicant on the following basis:

"In accordance with articles 24.2 and 25.1 of Law 19/2014, it is appropriate to grant only partially the requested information, given the effect on personal data of the students and the little public interest in the dissemination of practices that each specific student has carried out. For this reason, from the information provided [...] in addition to the direct identification data of each student, the section corresponding to the name or corporate name of the collaborating entity ("enterprise entity" has also been excluded), because it can identify, even if indirectly, the affected trainees in each case. And it has been weighted that the public interest in the dissemination of information about the collaborating entities is adequately satisfied by only the "entity type" section.

As can be seen from the file sent, the university provided the person requesting a link to access the information requested except for the first and last names of the students and the collaborating entities, d in accordance with the resolution of the university.

3. On January 1, 2023, the applicant submits a claim to the GAIP in which he claims access to " *information relative to registration data and information on agreements signed by university students in relation to internships academics* ", and states the following:

" This information shows in greater detail the quality of the students in these practices. In addition , numerous public administrations year after year sign agreements with different universities to be able to incorporate students so that they continue to complete their study

plans. Find out in more detail which AAPPs have incorporated students, under what conditions and at what time or if they have incurred costs in their accounts, in addition to knowing if there are entities that "abuse" these students. Therefore, it is requested that the data that the university previously sent to the interested party be sent again, adding the entity where they were made."

4. On January 12, 2023, the GAIP sends the claim to the university, and requests a report setting out the factual background and the basis for its position in relation to the claim, as well as the complete file and, where appropriate, specifying the third parties affected by the claimed access.

5. On January 18, 2023, the GAIP requests a report from this Authority, in accordance with the provisions of article 42.8 of Law 19/2014, of December 29, on transparency, access to public information and good government

6. On February 2, 2023, the university sent GAIP a report in relation to the claim. In this report, the university states that upon receiving the claimant's request, it consulted its Archives and Document Management unit, which stated the following:

"We have detected certain risks of indirectly identifying students with the data they request. For example, there are entities that have hosted a single student, a single student in a specific period, (or two students, one of each gender). In these cases and quite a few others, it would be possible to identify the specific student if this appears in any other information that, for example, the entity may have published."

And he also consulted his data protection representative, who proposed denying access to the data relating to the field " *company_entity* " on the understanding that "[...] *the public interest in the dissemination of information is satisfied with the "ENTITY TYPE" column.*

Based on these considerations, the university states the following:

" a) That knowing the specific entity was excessive data to satisfy the claimant's legitimate interest in access to public information;

b) That this legitimate interest was fully satisfied with the knowledge of whether in each case it was a public or private entity where the student did the internship or, among the private ones, whether it was a non-profit entity (associations, foundations) or a commercial company;

c) That, in accordance with the criteria of the aforementioned precepts of Law 19/2014 and Law 19/2013, the claimant did not claim that his request for access to public information was justified in the exercise of a right or for statistical, scientific or historical purposes, in his hypothetical capacity as a researcher; that there could be significant damage to the people eventually identified given the perception, in many cases, of financial amounts in the form of aid in carrying out the internships; and, finally, that the information requested was very current or, at the very least, related to a relatively recent period of time.

d) That the probable access to personal data of third parties lacked the essential legitimacy in accordance with article 6.1, f) of the General Data Protection Regulation.

3. *The reasons that would justify the knowledge of the specific entity, as the claimant now argues (" This information makes known in greater detail the quality that students have in these practices. Además numerous public administrations year after year sign agreements with different universities to be able to incorporate students so that they continue to complete their study plans. To know in more detail which AAPP are those that have incorporated students, under what conditions and at what time or if they have assumed cost in their accounts, in addition to knowing if there are entities that they "abuse" these students "), they do not seem to serve to refute the approach of the university [...], in the terms set out. First, because the claimant himself acknowledges that he has no interest in knowing the specific name or corporate name of the private entities. And, secondly, because the arguments adduced have no impact on the weighting parameters referred to in the aforementioned precepts of Law 19/2014 and Law 19/2013 ."*

Legal Foundations

I

In accordance with article 1 of Law 32/2010, of October 1, of the Catalan Data Protection Authority, the APDCAT is the independent body whose purpose is to guarantee, in the field of the competences of the Generalitat, the rights to the protection of personal data and access to the information linked to it.

Article 42.8 of Law 19/2014, of December 29, on transparency, access to public information and good governance , which regulates complaints against resolutions regarding access to public information, establishes that if the refusal has been based on the protection of personal data, the Commission must request a report from the Catalan Data Protection Authority, which must be issued within fifteen days.

For this reason, this report is issued exclusively with regard to the assessment of the incidence that the requested access may have with respect to the personal information of the persons affected, understood as any information about an identified or identifiable natural person, directly or indirectly, in particular through an identifier, such as a name, an identification number, location data, an online identifier or one or more elements of physical, physiological, genetic, psychological, economic, cultural or social security of this person (art. 4.1 of Regulation 2016/679, of April 27, 2016, relating to the protection of natural persons with regard to the processing of personal data and the free circulation of such data and by which Directive 95/46/CE (General Data Protection Regulation, hereafter RGPD) is repealed.

Therefore, any other limit or aspect that does not affect the personal data contained in the requested information is outside the scope of this report, in particular, according to the allegations made by the parties, the limits provided for in articles 21.1.d) and 21.1.g).

The deadline for issuing this report may lead to an extension of the deadline to resolve the claim, if so agreed by the GAIP and all parties are notified before the deadline to resolve ends.

Consequently, this report is issued based on the aforementioned provisions of Law 32/2010, of October 1, of the Catalan Data Protection Authority and Law 19/2014, of December 29 , of transparency, access to public information and good governance.

In accordance with article 17.2 of Law 32/2010, this report will be published on the Authority's website once the interested parties have been notified, with the prior anonymization of personal data.

II

According to what appears in the file sent, initially the person making the claim requested from the university certain information relating to the curricular and extracurricular practices of the students from 2014 to the present. And, in particular, the information related to " *genero_alumno , codigo_RUCT , titulaci3n_alumno , centro_alumno , entity_empresa , tipo_entidad , horas_semanas , horas_totales , tipo_practicas , credits , ayuda_economica_mes , MesAño_InicioPracticas , MesAño_FinPracticas , informaci3n_publicacion* ".

The university denied access to the field relating to the " *company_entity* " on the understanding that from this data it is possible to identify the students affected by the request and that, once the public interest of the requested information, he considered it sufficient to provide only the " *type_entity* " section. C by emphasizing the fact that the university also denied access to the student's identification data, although it does not appear from the file sent that this information was requested by the person making the claim.

Faced with the university's resolution , the claim presented to the GAIP is limited only to the data of the collaborating entity in which the student has done the internship ("*[...] Por ello se solicita que se vuelva to make the data that at the time the university made available to the interested party by adding the entity where it was carried out*").

It is necessary to underline the fact that it does not follow from the terms of his request, and subsequent claim, that the person making the claim has an interest in identifying the students.

Taking this into account, and without prejudice to what will be analyzed later, the analysis of the claim presented to the GAIP must start from the basis of the possibility of knowing the data relating to the identification of the entity in which the student has carried out the internship, as it constitutes the object of the claim.

III

Regarding the data relating to the entity in which the student has carried out the internship, it should be borne in mind that on the basis of what is provided for in articles 2.1 and 4.1 of the RGPD, in relation to what is established by considering 14 (" *The present Reglamento does not regulate the treatment of personal data relating to legal entities and in particular to companies constituted as legal entities, including the number and form of the legal entity and*

its contact data") there must be no inconvenience from the perspective of the data protection regulations when providing the person claiming this information.

And, from the point of view of the regulations applicable in the field of educational cooperation agreements, in relation to the transparency regulations, in accordance with what is analyzed below, there should also be no inconvenience in provide this individualized data.

Article 7 of Royal Decree 592/2014, of July 11, which regulates the external academic internships of university students, provides that for the implementation of the external internships, the universities or, where applicable, the entities internship managers who are linked to it, must sign educational cooperation agreements with the collaborating entities, which must establish, among other issues, the relations between the student, the collaborating entity, the university and , if applicable, the internship management entity linked to the latter.

Regarding the content of educational cooperation agreements, among other issues, article 11.5 of Royal Decree 822/2021, of September 28, which establishes the organization of university education and the procedure for ensuring its quality foresees that the university must specify it through its specific regulations.

The university has approved, by agreement of its Governing Council, the regulations relating to external academic internships, which regarding the formalization of the educational cooperation agreement establish that the implementation of academic internships requires the prior formalization of an agreement of educational cooperation, which must be signed by the rector, or the person to whom he delegates, and the person who has the legal representation of the entity, and must establish the legal regime, the general conditions for the development of the practices and the rights and duties of the parties.

In accordance with this provision, the university's educational cooperation agreements are signed by the university itself, represented by the rector or whom he delegates, and the person who has the legal representation of the entity with which the collaboration is intended work, while the student only signs the training project.

And, with respect to the training project, article 15.3 of the university's regulations establishes that it is the official document that includes the training program for the development of each external academic practice (curricular or extracurricular), in which the objectives, characteristics, duration and commitments of the parties are determined, and is linked to the corresponding educational cooperation agreement between the university and the collaborating entity in which the internship takes place. In accordance with the provisions of this article, the following information must be included in the training project, at least:

- " a) The data of the collaborating entity, including those of the tutor responsible for monitoring the stay.*
- b) University data : center, professor responsible for the practice subject (if curricular), academic tutor (whether curricular or extracurricular).*
- c) The student's data.*
- d) The details of the internship: total number of hours, schedule, period of completion, address of the place of the stay, the department or unit of the company or institution (or internal area of the university) where develops*

*e) The educational objectives and the tasks or functions that the student must carry out, agreed between the person responsible for the practices of the entity and the academic person responsible for the university of the practices (responsible professor of the practice subject, if it is curricular; academic tutor or academic tutor, if it is extracurricular). The training objectives and tasks of the specific practice must always be linked to the training objectives of the degree the student is taking.
[...].”*

From the point of view of the transparency regulations, reference should be made to article 8.1.f) of the LTC which provides that the Administration (including the public universities of Catalonia, in accordance with article 3.1. c of the LTC) must make public the information relating to contracts and agreements.

In relation to this information, article 14.2 of the LTC establishes that the following information must be made public at least, with respect to collaboration agreements:

“[...] a) The list of agreements in force, with an indication of the date, the parties that sign them, the object, the rights and obligations of any kind that they generate and the period of validity.

b) Any changes to any of the parameters referred to in letter a, and the date and manner in which they occurred.

c) The information relating to the compliance and execution of the agreements.

3. The advertising obligations established by this article must be made effective by means of the Registry of collaboration and cooperation agreements of the Generalitat, which must be integrated into the Transparency Portal.”

And, in relation to this issue, article 44.1 of Decree 8/2021, of February 9, on transparency and the right of access to public information (from now on, RLTC) develops article 14 of the LTC, and provides for the following:

“1. For the purposes of letters a) ib) of article 14.2 of Law 19/2014, of December 29, a list of current agreements and their eventual modifications must be published, which must include a link to the text of the signed agreement or its modification, after anonymization of the personal data other than the identification with first and last names of the signatories, through the Register of Agreements. A link to the official publication in the Official Journal of the Generalitat of Catalonia must also be published, if applicable.

2. It is understood by information relating to the compliance and execution of the agreements, provided for in letter c) of article 14.2 of Law 19/2014, of December 29:

[...]

e) The annual list of agreements that have lost their validity in the previous financial year, due to expiration of the term, of the object, denunciation or any other circumstance.

[...]”.

In accordance with these forecasts, the transparency regulations oblige the university to publish through the Register of Agreements the list of agreements in force that includes the date of signature, the signatory parties, their object, rights and obligations of any kind that

they generate , the period of validity, and its modifications with reference to the date and manner in which they occurred, as well as a link to the text of the signed agreement or its modification, after anonymization of personal data that does not refer to the signatories.

And it must also publish, with respect to the compliance and execution of the agreements, among other issues, the annual list of agreements that have lost their validity in the previous financial year, due to expiration of the term, of the object, denunciation or any other circumstance

Consequently, it is clear that to the extent that the regulations provide for the obligation to publish certain information relating to agreements (including educational cooperation agreements), there should be no inconvenience in providing information relating to the entity with which the agreements have been signed.

IV

However, without prejudice to the fact that from the point of view of transparency regulations, the individualized data relating to the entity with which the university has signed an educational cooperation agreement should not raise problems regarding the right of access formulated by the person making the claim, it should be borne in mind that according to the file sent the university has already provided information prior to the claim.

In particular, the university would have provided the claimant with the following information:

" genero_alumno , codigo_RUCT , titulación_alumno , centro_alumno , tipo_entidad , horas_semanas , horas_totales , tipo_practicas , credits , ayuda_economica_mes , MesAño_InicioPracticas , MesAño_FinPracticas , información_publicacion "

In relation to this, it should be borne in mind that in accordance with what is established in articles 2.1 and 4.1 of the RGD, the data protection regulations apply to treatments carried out in terms of any information " *about a person identified or identifiable physical person ("the interested party"); Any person whose identity can be determined, directly or indirectly, in particular by means of an identifier, such as a number, an identification number, location data, an online identifier or one or more elements of identity, shall be considered an identifiable physical person physical, physiological, genetic, psychological, economic, cultural or social of said person "*

The person making the claim requests that the university provide him with the information provided to him but, in this case, including the data relating to the entities or companies in which the internships have been carried out.

At the outset, it should be borne in mind that the information requested affects the students (for each year, from 2014 to the present, data relating to gender, degree and university center, entity where the internships are carried out , total number of practice hours, etc.). And, in relation to this, it is necessary to analyze to what extent having this information could make the students affected by the access request identifiable and, consequently, whether the data protection regulations apply.

Recital 26 of the RGPD, in relation to article 4.1, provides that to determine whether a natural person is identifiable "[...] all means, such as singularization, that the responsible party can reasonably use must be taken into account of the treatment or any other person to directly or indirectly identify the natural person. To determine whether there is a reasonable probability that means will be used to identify a natural person, all objective factors must be taken into account, such as the costs and time required for identification, taking into account both the technology available at the time of the treatment as technological advances. Therefore, the principles of data protection should not be applied to anonymous information, that is, information that is not related to an identified or identifiable natural person, nor to data converted into anonymous data in such a way that the interested party is not identifiable, or to be Consequently, this Regulation does not affect the treatment of said anonymous information, including for statistical or research purposes".

And, it is also illustrative to refer to Opinion 4/2007 on the concept of personal data of the Working Group on Data Protection of Article 29 (WP 136, available at this link), [when](#) it provides for the following:

"[...] when we talk about "indirectly" identified or identifiable, we are generally referring to the phenomenon of "unique combinations", be they small or large. In cases where, at first glance, the available identifiers do not allow a particular person to be singled out, this person can still be "identifiable", because that information is combined with other data (whether the person responsible for his treatment has knowledge of them or no) will allow that person to be distinguished from others [...] Some of these characteristics are so unique that they allow you to identify a person without effort (the "current President of the Government of Spain"), but a combination of details belonging to different categories (age, regional origin, etc.) can also be enough conclusive in some circumstances, especially if you have access to additional information of a certain type. This phenomenon has been studied extensively by statisticians, always willing to avoid any breach of confidentiality."

Without prejudice to the fact that the university has already provided the person claiming certain information, it is considered that simultaneously knowing the information referred to in the access request may entail a reasonable risk of identification of the student using other means, given the unique nature of the information requested, sufficiently precise to be able to relate it to other information available to the public which allows it to end up identifying a certain person.

For this reason, in the case at hand, the data protection regulations will be fully applicable to the extent that the person making the claim can reasonably identify fully or partially the student who is or has been doing university internships.

III

Since the data protection regulations apply, it should be taken into account that article 4.2) of the RGPD, in relation to articles 2.1 and 4.1), provides that it applies to "any operation or set of operations carried out on personal data or sets of personal data, whether by automated procedures or not, such as collection, registration, organization, structuring, conservation, adaptation or modification, extraction, consultation, use, communication by transmission, dissemination or any other form of enablement of access, comparison or interconnection, limitation, suppression or destruction".

In accordance with the provisions of article 5.1.a), any processing of personal data must be lawful, loyal and transparent in relation to the interested party and, in this sense, the RGPD establishes the need to participate in some of the legal bases of article 6.1, among which section c) provides for the assumption that the treatment " *is necessary for the fulfillment of a legal obligation applicable to the person responsible for the treatment* ".

As can be seen from article 6.3 of the RGPD and expressly included in article 8 of Organic Law 3/2018, of December 5, on the protection of personal data and guarantee of digital rights (LOPDGDD), the processing of data can only be considered based on these legal bases of article 6.1. c) and e) of the RGPD when so established by a rule with the rank of law.

For its part, article 86 of the RGPD provides that " *the personal data of official documents in the possession of any public authority or public body or a private entity for the performance of a mission in the public interest may be communicated by said authority , organism or entity in accordance with the Law of the Union or of the Member States that applies to them in order to reconcile the public's access to official documents with the right to the protection of personal data under this Regulation* .

Public access to documents held by public authorities or public bodies is regulated in our legal system in Law 19/2014, of December 29, on transparency, access to public information and good governance (hereinafter, LTC) , which recognizes people's right of access to public information, understood as such " *the information prepared by the Administration and that which it has in its power as a result of its activity or the "exercise of his functions, including that supplied by the other obliged subjects in accordance with the provisions of this law* " (article 2.b) and 18 LTC). State Law 19/2013, of December 9, on transparency, access to public information and good governance (hereinafter, LT), is pronounced in similar terms, in articles 12 (right of access to public information) and 13 (public information).

In the case we are dealing with in which certain information is requested regarding the agreements signed by the university in relation to the internships carried out by the students , this information must be considered public for the purposes of article 2.b) of LTC and subject to the right of access (article 18 of the LTC), being documentation in their possession as a result of their activity.

It must be noted, however, that this right of access is not absolute and can be denied or restricted for the reasons expressly established in the laws, as is the case with the limits of articles 23 and 24 of the LTC regarding personal data.

IV

The claimant is interested in accessing a " *reusable file that contains information related to curricular and extracurricular practices from 2014 to the present day, requesting the following columns/information: gender_alumno , code_RUCT , title_student , center_alumno , entity_company , type_entity , hours_weeks , hours_totals , type_practices , credits , ayuda_economica_mes , MesAño_InicioPracticas , MesAño_FinPracticas , informacion_publicacion* ".

In accordance with what has been previously stated, the person making the claim does not seem to have an interest in accessing the student's identification data and, for this reason, the analysis will be carried out from the point of view of the possibility of identification through the requested data.

Given that among the requested information there is no affected data specially protected in the terms provided for in article 23 of the LTC, that is, those relating to ideology, trade union affiliation, religion, beliefs, the racial origin, health and sex life, and also those relating to the commission of criminal or administrative offenses that do not entail a public reprimand to the offender, the possibility of accessing them must be analyzed from in accordance with what is established in article 24 of the LTC.

Article 24.2 of the LTC states the following:

" 2. If it is other information that contains personal data not included in article 23, access to the information can be given, with the previous reasoned weighting of the public interest in the disclosure and the rights of the people affected . To carry out this weighting, the following circumstances must be taken into account, among others:

a) The elapsed time.

b) The purpose of the access, especially if it has a historical, statistical or scientific purpose, and the guarantees offered.

c) The fact that it is data relating to minors.

d) The fact that it may affect the safety of people. "

This article establishes the need to make a reasoned weighting between the public interest in the disclosure and the rights of the people affected - in this case the students -, taking into consideration, among others, the time that has passed, the purpose of the access, the guarantees offered, if there are minors affected or the fact that the intended access may affect people's safety.

In accordance with what has been stated, it must be borne in mind that in the case at hand the claimant is not only requesting information subject to the active advertising regime, but other information contained in the training project that is signed individually with the students, and on which the transparency regulations do not foresee that it must be actively published.

Taking this into account, the purpose is one of the elements referred to in article 24.2 of the LTC to carry out the weighting.

In relation to this issue, it must be noted that although article 18.2 of the LTC provides that the exercise of the right of access is not conditioned on the concurrence of a personal interest, and is not subject to motivation nor does it require the invocation of any rule, knowing the motivation for which the person claiming wants to obtain the information can be a relevant element to take into account in the weighting.

It should be borne in mind that although the person making the claim does not make express reference in his request, and subsequently in his claim, to the purpose for which he wants to

allocate the requested information, the terms in which he briefly sets out the arguments which base their claim allow us to deduce that the purpose may be related to the completion of a study or for journalistic purposes.

This is so insofar as the claim refers to the fact that "*numerous public administrations year after year sign agreements with different universities to be able to incorporate students so that these continue to complete their study plans. Know in more detail which AAPP are those that have incorporated students, under what conditions and at what time or if they have assumed cost in their accounts, in addition to knowing if there are entities that "abuse" these students*" and, subsequently, explain that other universities have indeed submitted all the complete information.

It should be borne in mind that the purpose of the transparency regulations is "*to establish a system of relations between people and the public administration and other obliged subjects, based on knowledge of public activity, the encouragement of citizen participation, the improvement of the quality of public information and administrative management and the guarantee of accountability and responsibility in public management*" (article 1.2 LTC). Or in other words, the purpose of participation is to offer citizens tools to control the actions of public authorities, and not to create means for the control of the citizens themselves.

Transferred to the case at hand, from the perspective of the person making the claim, it is clear that the information he seeks to access may be useful for the purpose of carrying out a study or for journalistic purposes, for example, if what he seeks is to compare this information with respect to different universities (as can be seen from the claim) and, even from the perspective of transparency regulations, it may allow monitoring and evaluating the activity of universities in the area of the agreements of educational cooperation and the quality of the training plan offered and, on the other hand, it would also allow to control and evaluate the performance of the public administrations or specific entities that sign these agreements with the university, such as, from the point of view of control of the management of their personal resources.

But, on the other hand, it is clear that this information can also allow the person claiming to draw up the academic profile and, it could be indicative, of the professional profile, as well as other information related to income, if applicable, of the students.

Now, although the person making the claim may end up fully or partially identifying the students affected by their request, it must be taken into account that from the perspective of the impact on the students' rights (in accordance with the which establishes article 24.2 of the LTC), it does not seem that its security should be compromised and, a priori, given the purpose for which the data is intended and that we have referred to, it should not negatively affect their academic or professional career, especially because it does not appear that the intention of the person making the claim is to identify the students.

On the other hand, it should be borne in mind that the requested information corresponds to the time period from 2014 to the present day. For this reason, especially for older students, the impact that access to this information may have on their rights may be even less significant.

For these reasons, it does not seem that in a case such as the one raised, the right of the affected persons should prevail, because although access to the information requested by

the person making the claim may make the student identifiable and, where appropriate, may lead to an interference with your right to data protection, given the purpose for which the information is intended, there are no specific circumstances from which it can be considered that the right to data protection should prevail of those to the claimant's right of access.

All this, without prejudice to the fact that the person making the claim must take into account, among other issues, the obligations imposed by the RGPD. And, in particular, express reference must be made to the principle of purpose limitation (Article 5.1.b of the RGPD), to the principle of integrity and confidentiality (Article 5.1.f of the RGPD) and the provision of the article 32 of the RGPD in relation to the security of the treatment.

In accordance with the principle of purpose limitation, any use of information that makes the student identifiable after access by the person making the claim should also be based on a legitimate and compatible purpose. Otherwise, we could be faced with a treatment not adjusted to the RGPD, even though the access to personal data was initially considered legitimate.

Regarding the principle of integrity and confidentiality, it should be borne in mind that personal data must be treated in such a way as to guarantee adequate security, including protection against unauthorized or unlawful processing and against its loss, destruction or accidental damage, through the application of appropriate technical or organizational measures.

And, finally, reference must be made to the obligations referred to in article 32 of the RGPD in relation to the security of the treatment:

"1. Taking into account the state of the art, the costs of application, and the nature, scope, context and purposes of the treatment, as well as risks of variable probability and severity for the rights and freedoms of natural persons, the person responsible and the treatment manager will apply appropriate technical and organizational measures to guarantee a level of security adequate to the risk [...].

2. When evaluating the adequacy of the level of security, particular consideration will be given to the risks presented by data processing, in particular as a result of the accidental or unlawful destruction, loss or alteration of personal data transmitted, stored or otherwise processed, or unauthorized communication or access to said data. [...]"

Conclusion or

Taking into consideration the terms in which the claim is made and the elements involved, the data protection regulations do not prevent the claimant's access to the information relating to the entities in which the student has completed university internships.

Barcelona, February 9, 2023

Machine translation