

Privacy Statement 'Cogniti'

Date: February 4, 2026

Vrije Universiteit Amsterdam has chosen to support online and blended education with specific tools that encourage students to study effectively and attractively and enable staff to offer interactive education.

Vrije Universiteit Amsterdam attaches great importance to protecting your privacy and the security of your personal data. In this privacy statement, we describe how we handle your personal data for Cogniti. We process your personal data in accordance with applicable privacy legislation, including the General Data Protection Regulation (GDPR) and the General Data Protection Regulation Implementation Act (UAVG).

Cogniti is a system that allows a *teacher or staff member* to create a generative AI Agent (an AI bot) and offer it to *students*. The teacher can instruct the AI Bot how to behave and what information to provide by means of a so-called prompt and background information (documents, websites). *Teachers or staff* can also give *students* the right to create an AI bot (sandbox) so that students can learn about AI bots.

Teachers at VU Amsterdam are instructed not to ask you to submit any special or sensitive personal data in the AI bots.

1. Who is responsible for processing my personal data?

Stichting VU (hereinafter: **VU**) is responsible for the data processing described in this privacy statement. As a special institution within the meaning of the Higher Education and Scientific Research Act (WHW), Stichting VU maintains the VU. Stichting VU is located at De Boelelaan 1105 in (1081 HV) Amsterdam and is registered in the Chamber of Commerce register under number 53815211.

The VU Foundation has a legal obligation to ensure that your personal data is processed in accordance with applicable privacy legislation, including the General Data Protection Regulation (GDPR).

2. What (categories of) personal data are processed?

We process the following personal data about you if you are *a lecturer or student* at VU Amsterdam:

- a. Name;
- b. Email address;
- c. Your IP address.

We process the following personal data about you if you are *a student* and interact with the AI bots:

3. IP address for technical processing;
4. Answers to the questions asked or required interactions.

3. For what purpose is my personal data processed and on what legal basis?

The personal data is used exclusively for the purpose of providing education in which students can interact with information in order to support learning. This may involve interactive question-and-answer games, Socratic dialogues, role-playing, providing advice on study material and studying, etc. It may involve closed interactions with a clear end or open ended interactions without a fixed end. These interactions may be initiated by the student themselves or carried out on the instructions of the teacher. Providing such open-ended interactive information exchange with no fixed end cannot be achieved without such a system.

We process your personal data on the basis of a 'legitimate interest' (Article 6(1)(f) of the GDPR). This means that the processing is necessary for the purposes of the legitimate interests pursued by VU Amsterdam.

4. Who has access to my personal data?

Personal data will only be viewed and processed by VU employees acting as *teachers* or *administrators*. *Teachers* and *administrators* only have access to *anonymized* interactions. However, they can request summaries and trends generated by generative AI based on the anonymized interactions.

5. Will my personal data be shared with third parties?

The personal data collected within the framework of the objectives (see question 3) is stored on secure servers belonging to VU Amsterdam via its contract with Microsoft and its subcontractors (sub-processors). Your personal data will not be shared with other third parties, unless VU Amsterdam is obliged to do so by law or court order.

The VU has entered into a processing agreement with Microsoft to ensure that your personal data is processed carefully, securely, and in accordance with the GDPR. This agreement stipulates that the VU may only process personal data for the purposes mentioned under 3.

6. Will my personal data be transferred to international organizations or countries outside the European Economic Area?

No, your data will only be processed within the EEA.

7. How long will my personal data be stored?

We do not retain your personal data longer than is necessary to achieve the predetermined purposes or for as long as required by law.

8. How is my personal data secured?

VU Amsterdam takes appropriate technical and organizational measures to protect your personal data against loss and any form of unlawful processing.

9. Who can I contact if I have questions about the processing of my personal data?

You can send any questions you may have about how your personal data is processed to silvester.draaijer@vu.nl.

10. How can I exercise my privacy rights?

Under the GDPR, you have the right—under certain conditions—to access the personal data that is being processed about you, to correct your personal data if it contains factual inaccuracies, to erase your personal data, to restrict the processing of your personal data, to transfer your personal data, and to object to the processing of your personal data.

If you wish to exercise these privacy rights, please notify the Data Protection Officer of VU Amsterdam via:

Data Protection Officer
De Boelelaan 1105
1081 HV AMSTERDAM
functionarisgegevensbescherming@vu.nl

In order to process your request, you will be asked to provide proof of identity. This is to verify that the request has been made by the correct person. If you are not satisfied with the way in which we handle your personal data, you have the right to lodge a complaint with the Dutch Data Protection Authority.
