

COMPLAINTS PROCEDURE RESEARCH INTEGRITY - Vrije Universiteit Amsterdam 2025

Preamble

The Netherlands Code of Conduct for Research Integrity 2018 (code of conduct) sets out the guiding principles of good and honest scientific practice and the resulting standards for good research practices, which are also endorsed by the institution and apply to a university as guidelines as referred to in Section 1.7 of the WHW.

Within Vrije Universiteit Amsterdam (hereinafter referred to as VU), all those involved in research have a personal responsibility for maintaining research integrity. Everyone must always strive to ensure that the standards are carefully observed and hold each other accountable in this regard. In this context, the VU includes all faculties of the VU, including the Faculty of Medicine, which is embedded in Amsterdam UMC.

If it is suspected that one or more of the standards set out in Chapter 3 of the Code of Conduct have not been complied with, a complaint may be lodged. This may coincide with a complaint about inappropriate conduct within the meaning of the VU's Inappropriate conduct Regulations or Amsterdam UMC's Regulations on Inappropriate conduct. The complaint may also contain elements relating to such inappropriate conduct. If this is the case, it must be ensured that the complaints procedures are effectively coordinated. This may involve opting for a combined complaint handling procedure.

The VU ensures a careful and fair procedure for handling complaints and subsequent decision-making. To this end, the Executive Board of the VU has established the following regulations in consultation with the Board of Directors of Amsterdam UMC.

These regulations will be applied by analogy as much as possible if an investigation is initiated at the request of the VU Executive Board or Amsterdam UMC Board of Directors without a complaint having been submitted.

1. Definitions

- 1.1 code of conduct: the Netherlands Code of Conduct for Research Integrity 2018.
- 1.2 Regulation on inappropriate conduct: the VU Regulation on Inappropriate conduct or the Amsterdam UMC Regulation on Inappropriate conduct.
- 1.2 Complaint: a written report of non-compliance with one or more of the standards set out in Chapter 3 of the code of conduct by an employee.
- 1.3 complainant: the person who submits a complaint to the Executive Board.
- 1.5 defendant: the employee whose conduct is the subject of a complaint, or whose actions are being investigated by the committee at the request of the Executive Board.
- 1.6 employee: the person employed by the VU Foundation, or employed by the Amsterdam UMC Foundation and affiliated with the VU, or who otherwise participates in VU research or publishes research under the name of the VU. Persons who are only involved in a supporting role in the research are excluded.
- 1.7 Confidential counsellor: a person appointed by the Executive Board as a confidential counsellor on research integrity.

- 1.8 Committee: the committee established by the Executive Board to handle complaints in the field of research integrity.

2. General

- 2.1 Everyone has the right to consult the confidential counsellor in the event of suspected non-compliance with one or more of the standards set out in Chapter 3 of the code of conduct.
- 2.2 Everyone has the right to submit a complaint to the Executive Board, which will forward the complaint to the committee within seven working days. If the complaint is received during a holiday period, it may take longer for the Executive Board to forward it to the committee, up to a maximum of 7 working days after the holiday period has ended.
- 2.3 The Executive Board may, at the request of a faculty board or on its own initiative, even if no complaint has been lodged, request the committee to investigate an alleged breach of one or more of the standards set out in Chapter 3 of the code of conduct. Prior to such a request, consultations will take place between the Executive Board and the committee.
- 2.4 If the complaint concerns a member of the Executive Board of VU, it may be submitted to the Supervisory Board of VU. In that case, the committee will issue a recommendation to the Supervisory Board of VU, which will exercise the powers vested in the Executive Board under these regulations. If the complaint concerns a member of the Board of Directors of Amsterdam UMC, affiliated with VU, the complaint may be submitted to the Supervisory Board of VU. In that case, the committee will advise the Supervisory Board of VU and the Supervisory Board of Amsterdam UMC jointly, and they will jointly exercise the powers vested in the Executive Board under these regulations.
- 2.5 If the complaint concerns someone who, at the time of the alleged non-compliance with one or more of the standards of Chapter Three of the Code of Conduct, falls under the academic responsibility of several institutions that have endorsed the Code of Conduct, and the complaint could therefore be investigated by multiple institutions, joint complaint handling may take place, or the institutions involved may otherwise agree on the manner in which the complaint will be handled. In that case, a decision on the manner of handling will be taken by the Executive Board.
- 2.6 Everyone is obliged to cooperate fully with the confidential counsellor or the committee within the set time limit, to the extent that they can reasonably request in the exercise of their powers.

3. Confidentiality

- a) From the moment a complaint is received by the Executive Board until the Executive Board has made a final decision, everyone involved in handling the complaint is bound to secrecy regarding its content and any information that has become known in connection with it.

- b) After the Executive Board has made a final decision, the duty of confidentiality remains in force for employees. All other persons involved are urged to maintain confidentiality in order to avoid causing unnecessary damage to the scientific reputation of the accused.
- c) If the complainant breaches the duty of confidentiality, the committee may decide not to proceed with the complaint. The Executive Board may impose appropriate consequences for breaches of confidentiality.
- d) The duty of confidentiality for the complainant and/or defendant shall lapse if (harmful) information about a case has been made public without the involvement of the party concerned.
- e) The duty of confidentiality does not apply in the following cases:
 - i. this concerns an exchange in the context of the employment relationship between a complainant/defendant and the employer;
 - ii. the disclosure is made with a view to protecting a legitimate and compelling public interest that requires protection;
 - iii. it concerns confidential information that must be disclosed by or pursuant to any legal provision, on the basis of an irrevocable judgment of the competent public court or an otherwise binding and inviolable decision of any administrative body (other than the institution concerned). In such a case, only that part of the confidential information described in the relevant provision or decision will be disclosed, and only to the bodies, authorities, and (legal) persons mentioned therein;
 - iv. this concerns provisions 4.2, 5.4, and 5.9h) of these regulations.

Confidential counsellors

4. Appointment

- a) The Executive Board appoints one confidential counsellor per faculty (or two for large faculties) for a period of four years or less, based on the recommendation of the dean of the faculty concerned. Reappointment is possible.
- b) The confidential counsellors shall have an academic background, a good academic reputation, and be able to deal effectively with contradictions and conflicts. The confidential counsellor may not have any additional duties that could interfere with their role as confidential counsellor.
- c) The Executive Board may terminate the appointment prematurely:
 - a. at the confidential counsellor's own request;
 - b. because they no longer meet the requirements for appointment;
 - c. due to poor performance as a confidential counsellor.
- d) Members of the Supervisory Board, the Executive Board, the members of the Board of Directors, the deans and vice-deans of the faculties, portfolio holders of faculties, department heads, division chairs, research directors, and the chair and members of the committee are not eligible for appointment as confidential counsellors.

4.1 Task

The confidential counsellor:

- a) Acts as a point of contact for reflection, questions, and complaints about research integrity within VU;
- b) Attempts to mediate where possible, but is not the person who handles complaints;
- c) If necessary, directs the complainant to the Executive Board for filing a complaint. The confidential counsellor can assist the complainant during the complaint procedure if desired;
- d) May not assist both the complainant and the accused at the same time;
- e) Only acts on behalf of the person who has approached the confidential counsellor;
- f) Keeps everything that is communicated in confidence, or that should be understood as confidential, secret, unless the person who has communicated something agrees that this information may be shared with certain persons.
- g) In response to a case that is submitted, may consult with no more than one other confidential counsellor with a view to their own functioning in that case. Consultation with the secretary of the committee is also permitted. Contrary to the provisions of 4.1f), confidential information may also be shared in these cases without the consent of the person who provided it. The other confidential counsellor and the secretary of the committee are obliged to maintain the confidentiality of such confidential information.

4.2 Accountability

The confidential counsellors report on their activities retrospectively, and in general terms, in an annual report to the Executive Board and the Board of Directors for the purposes of the annual report of VU and Amsterdam UMC. The report provides a general account of the cases dealt with and the activities carried out. The report may not be traceable to individuals.

Research Integrity Committee

5. Appointment and composition

- a) The Executive Board establishes a Research Integrity Committee consisting of a chair and at least four other members who, based on their (possibly former) scientific position, are in a position to perform their duties independently. The members of the committee are or have been employed by VU or VUmc or are affiliated with VU within Amsterdam UMC. At least one of them is a lawyer, at least one of them is or has been employed by VUmc or is affiliated with VU within Amsterdam UMC, and at least one of them is a physician.

- b) The Executive Board appoints the chair and other members of the committee. The appointment is for a period of four years or less. Reappointment is possible. The works councils of VU and Amsterdam UMC, as well as the Board of Deans of VU and the Amsterdam UMC staff council, are notified of the appointment.
- c) The chair and members have an academic background and a good academic reputation. No complaint against them for violation of any of the standards in the code of conduct or any complaint under the regulations on inappropriate conduct has ever been upheld. The provisions under 4b) to d) apply mutatis mutandis.
- d) The appointment aims to achieve a balanced representation of the university's scientific fields.
- e) The committee may be expanded with ad hoc members, who may or may not be affiliated with VU or Amsterdam UMC, for the purpose of investigating a complaint. These members are nominated by the chair of the committee, after consultation with the Executive Board, and appointed by the Executive Board. The provisions of 4b) to d) apply mutatis mutandis.
- f) The committee appoints one or more deputy chairs from among its members.
- g) The committee is officially supported by a secretary and/or deputy secretary.
- h) Members of the committee who are in any way involved with the persons or facts to which the complaint relates, or who otherwise have an interest in the case, are not eligible to handle a complaint. If the foregoing applies to the chair of the committee, he or she will be replaced by a deputy chair.
- i) If the (deputy) secretary is involved with the persons or facts to which the complaint, they shall be replaced by a deputy secretary.

5.1 Task

The committee investigates complaints on behalf of the Executive Board and advises the Executive Board on these matters.

5.2 Powers

During all stages of the complaint procedure, the committee is authorized to:

- a) obtain information from all employees and bodies of VU and Amsterdam UMC;
- b) request access to all documentation and correspondence that it considers relevant to the assessment of the complaint;
- c) have documentation and correspondence copied, sealed, or seized if it deems this necessary in the interests of the investigation and if the provisions of 5.2a) and b) are insufficient;
- d) consult experts or other third parties, whether or not affiliated with VU or Amsterdam UMC.

5.3 Working method

- a) Insofar as the committee's working method has not been laid down, it will be determined by the chair.
- b) Complaints may be investigated by the committee as a whole or by a subcommittee acting on behalf of the committee. A subcommittee shall consist of at least the chair or a deputy chair and two members and/or ad hoc members. The chair shall determine the composition of the subcommittee on a case-by-case basis.

5.4 Accountability

The committee will report on its activities retrospectively and in general terms to the Executive Board and the Board of Directors in an annual report. This report will be brought to the attention of the Board of Deans, the Works Council, and the University Council of VU, the Works Council of Amsterdam UMC, and the confidential counsellors on research integrity.

5.5 Admissibility of the complaint

- a) Upon receipt of a complaint, the committee will commence an investigation into the admissibility of the complaint within one week.
- b) A complaint is only admissible if the following conditions are met:
 - i. the complaint is dated and includes the name, position, and contact details of the complainant; and
 - ii. the complaint contains a clear description of the conduct and is accompanied by the relevant written documents; and
 - iii. the VU is academically responsible for the conduct that is the subject of the complaint; and
 - iv. the conduct complained about relates to the practice of science.
- c) If the complaint does not meet the conditions set out in 5.5b) sub i. or ii., the committee will give the complainant the opportunity to supplement the complaint on that point within two weeks.
- d) The committee will assess, if possible within one month of receiving the complaint, whether the conditions referred to in 5.5b) sub iii. and iv. have been met. If the investigation takes longer, the committee will inform the complainant.
- e) If, within the period specified in 5.5c), not all the conditions referred to in 5.5b) sub i. and ii. are met, or if the committee concludes that the conditions referred to in 5.5b) sub iii. and iv. are not met, the committee will advise the Executive Board to declare the complaint inadmissible. The complainant will be notified of this recommendation.
- f) If the complaint (possibly) also relates to inappropriate conduct within the meaning of the inappropriate conduct regulations, the committee will coordinate the handling of the complaint with the relevant complaints committee in consultation with the complainant and the defendant. The decision to handle the complaint jointly will be taken by the committee, in consultation with the complainant and the defendant.

- g) Notwithstanding the provisions of 5.5b) ii., the committee may investigate a complaint without knowing the identity of the complainant. An anonymous complaint will only be considered if:
 - i. the identity of the complainant is known to one of the confidential counsellors on research integrity; and
 - ii. correspondence with the committee is conducted via this confidential counsellor; and
 - iii. compelling public interests or compelling interests of VU, Amsterdam UMC, or those involved make this necessary.

5.6 Handling of the complaint

- a) If the complaint is accepted for consideration, the committee will notify the Executive Board, the dean of the relevant faculty, the complainant, and the defendant. The dean and the defendant will receive copies of the complaint and the accompanying documents.
- b) The defendant will be given the opportunity to submit a statement of defense within a period to be determined by the committee.
- c) The committee will hear the persons involved in the complaint that it deems relevant. The committee will in any case give the complainant and the defendant the opportunity to be heard. The hearing may take place in writing or orally. The committee's hearings are not public.
- d) During the hearing, the complainant and the defendant may be assisted, but may not be represented.
- e) Unless the committee decides otherwise, the complainant and the defendant will be heard separately.
- f) A factual report will be made of the oral hearing. The report will be sent to the person heard so that they can check it for factual inaccuracies within a period to be set by the committee. After any comments made by the person heard have been processed, the report will be signed by the person heard within a period to be set by the committee. If the person heard refuses to sign the report, this will be noted in the advisory report, stating the reasons.
- g) If the oral hearing takes place separately, the committee informs the complainant and the defendant of what was discussed during the hearing in their absence by sending them the written report.
- h) The committee may make audio recordings of the oral hearing. These are intended solely as an aid in preparing the report. Once the Executive Board has made its final decision, the recordings will be destroyed. No one other than the committee may make audio recordings during a hearing.
- i) If the hearing takes place in writing, the committee will inform the complainant and the defendant of the views submitted in writing.

- j) The committee may hear witnesses and experts and request experts to provide an expert report. The expert report will be shared with the complainant and the defendant for their information, with a view to ensuring fair treatment, unless the committee has compelling reasons to deviate from this rule. The advisory report sets out which arguments from the expert report are adopted and, where applicable, why certain information from it is not made available.

5.7 Termination of the proceedings before completion of the investigation

- a) The committee may terminate the handling of the complaint before the investigation has been completed, even without having heard the complainant and the defendant, if, in its opinion:
 - i. the complaint is manifestly of insufficient importance; or
 - ii. the complaint is manifestly unfounded; or
 - iii. the complaint has previously been sufficiently investigated by the committee or a similar committee; or
 - iv. too much time has elapsed since the alleged non-compliance with one or more of the standards of Chapter Three of the Code of Conduct, or the complainant has waited an unreasonable amount of time before submitting the complaint. In principle, a period of ten years applies in this regard; or
 - v. such a minor form of non-compliance with one or more of the standards of Chapter Three of the Code of Conduct has occurred that it is not justified to consider the complaint.
- b) If the committee terminates the proceedings in accordance with this article, it shall issue an advisory letter or advisory report to the Executive Board.
- c) The Executive Board may instruct the committee to resume its investigation and complete its inquiry.

5.8 Withdrawal of the complaint

- a) The complainant may withdraw the complaint at any time during the investigation by sending a written statement to the committee. If the committee is of the opinion that a complaint withdrawn by the complainant does not require further investigation, it shall immediately inform the defendant, the Executive Board, and the dean of the faculty concerned.
- b) If, after withdrawal, the committee still considers there to be grounds for further investigation of the complaint, it is authorized to do so. If the committee decides to continue processing a complaint that has been withdrawn by the complainant, it will immediately inform the complainant, the defendant, the Executive Board, and the dean of the relevant faculty.

5.9 Advisory report

- a) After completing an investigation, the committee will issue an advisory report.

- b) The advisory report includes:
 - i. a description of the complaint;
 - ii. a summary of the positions of the parties;
 - iii. the committee's findings regarding the complaint and the positions of the parties;
 - iv. the conclusion drawn by the committee; and
 - v. the advice to the Executive Board.

The following shall be attached to this advisory report as appendices:

 - vi. the reports of the hearings held; and
 - vii. requested reports and documents relevant to the complaint as referred to in 5.2a) and b).
- c) All relevant information gathered by the committee will be made available to all parties involved with a view to ensuring fair treatment, unless the committee has compelling reasons to deviate from this rule. The reasons for not making certain information available will be stated in the advisory report.
- d) Before sending the advisory report to the Executive Board, the committee will submit the draft advisory report to the complainant and the defendant. The committee will incorporate or mention in its advisory report any comments made by the complainant and the defendant within a period set by the committee.
- e) The advisory report is not public.
- f) The committee will provide the Executive Board with an anonymized version of the advisory report for publication.
- g) After completion of the procedure, the Executive Board shall ensure publication of the anonymized version of the report and the anonymized opinion of the Executive Board on the UNL website.
- h) In exceptional circumstances, the Executive Board may decide not to anonymize the publication.

6. Follow-up procedure

- 6.1 The Executive Board will make its decision within four weeks of receiving the committee's advice. In doing so, the Executive Board will in any case indicate to what extent it considers the complaint to be justified.
- 6.2 The complainant, the defendant, the dean of the faculty concerned, and any other interested parties recognized as such by the committee will be notified immediately in writing of the decision and the final advisory report. The dean may decide to share anonymized information from the complaints procedure with the faculty board, insofar as he deems this necessary.
- 6.3 The complainant, the defendant, and any other interested parties recognized as such by the committee may, within six weeks of the date of the Executive Board's notification, request the Landelijk Orgaan Wetenschappelijke Integriteit (LOWI) to issue an opinion on the Executive Board's decision, insofar as it concerns non-compliance with the standards set out in Chapter 3 of the code of conduct. Upon request, the committee shall immediately send copies of all documents relating to the complaint to the LOWI.

- 6.4 The request to the LOWI to issue an opinion has suspensive effect. If the LOWI's opinion has not been requested within the period specified in 6.3, the provisional decision of the Executive Board becomes final.
- 6.5 If the LOWI's advice has been requested, the Executive Board will take the LOWI's advice into account in its final decision.

7. Protection of those involved

Submitting a complaint under this regulation cannot result in any disadvantage for the complainant, either directly or indirectly, unless the complainant has not acted in good faith. The whistleblower regulation of VU or Amsterdam UMC applies to the complainant. The same applies to witnesses, experts, confidential counsellors, or committee members. The Executive Board will monitor this to the best of its ability.

8. Involvement of the Faculty of Medicine

- 8.1 If the accused is an employee of the Faculty of Medicine, the Executive Board and the Board of Directors will act jointly in the application of this regulation where actions and decisions are assigned to the Executive Board.
- 8.2 If a request under 2.3 concerns Amsterdam UMC, the Board of Directors may submit it to the committee independently. Prior to such a request, consultations will take place between the Executive Board, the Board of Directors, and the CWI.

9. Processing of personal data and privacy of those involved

The privacy statement in Appendix A applies to this regulation.

10. Final provisions

- 10.1 This regulation shall enter into force and replace the Vrije Universiteit Amsterdam Research Integrity Complaints Procedure of April 2022 on the same date. It does not apply to complaints submitted before its entry into force.
- 10.2 These regulations will be published on the websites of VU and Amsterdam UMC.

APPENDIX A: PRIVACY STATEMENT

When you submit a complaint or when a complaint is submitted against you, the CWI collects and processes your personal data. This privacy statement explains which of your personal data is processed and how your privacy is guaranteed in this regard.

1. Who is responsible for processing my personal data?

The VU Foundation—which, as a special institution, maintains Vrije Universiteit Amsterdam (hereinafter: **VU**)—is responsible for the personal data processed in a complaints procedure relating to a defendant who falls under the academic responsibility of the VU.

VU business address: De Boelelaan 1105
1081 HV AMSTERDAM
registered in the Chamber of Commerce register under number 53815211.

2. Which (categories of) personal data about me are processed?

When a complaint procedure is initiated, the following personal data is collected and processed.

From the complainant:

- a. surname, first names, initials, title;
- b. address and postal code (if available);
- c. email address;
- d. details relating to the facts and circumstances to which the complaint relates.

It is possible to submit a complaint anonymously. In that case, the above personal data will be processed by the confidential counsellor on research integrity .

Of the accused:

- a. surname, first names, initials, title;
- b. date of birth (if relevant);
- c. address and postal code (if relevant);
- d. email address;
- e. position and field of research;
- f. details of the appointment, including any history thereof;
- g. information relating to the facts and circumstances to which the complaint relates.

During the proceedings, the CWI may request additional personal data from the complainant and/or defendant, insofar as this is necessary for the preparation of an advisory report.

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

The personal data of the complainant and the defendant are processed for the following purposes:

- a. the handling of the complaint by the CWI, more specifically:
 - i. assessing the admissibility of the complaint;
 - ii. assessing the validity of an admissible complaint; and
 - iii. drawing up an advisory report for the Executive Board of VU (hereinafter: **EB**) and – if the accused works at Amsterdam UMC affiliated with VU – the EB and the Board of Directors of Amsterdam UMC (hereinafter: **BOD**) jointly.
- b. sending information to the parties involved;
- c. enforcing or applying legislation.

Pursuant to the Code of Good Governance for Universities and the Netherlands Code of Conduct for Research Integrity, Vrije Universiteit Amsterdam must have a careful and fair procedure for handling complaints concerning research integrity (section 5.4).

The VU processes your personal data within the complaints procedure on the basis of legitimate interest (Article 6.1 (a) GDPR). The necessary, legitimate interest lies in the fact that the VU must have a procedure for handling complaints, which requires the processing of personal data. The privacy of the parties involved is well protected in this regard, as described in this privacy statement.

4. Who has access to my personal data?

Your personal data will only be accessed by officials who, by virtue of their position, play a role in the complaints procedure, insofar as it is necessary for them to have access to your personal data. These are:

- a. the chair, members, secretary, and deputy secretary of the CWI;
- b. the members of the EB;
- c. the members of the BOD, if the defendant works at Amsterdam UMC, affiliated with VU University Amsterdam;
- d. the employees who prepare the decision-making process for the Executive Board, or for the EB and BOD together;
- e. the dean of the faculty to which the accused is (or was) affiliated;
- f. the confidential counsellor on research integrity, insofar as they assist a data subject.

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

The CWI may engage one or more external experts in the handling of a complaint. The CWI will only provide an external expert with data that is relevant to the question posed to the external expert. This data may include personal data. Confidentiality will be agreed with any external expert.

If the accused is employed by Amsterdam UMC affiliated with VU, personal data will be shared with Amsterdam UMC. The Board of directors will receive, among other things, the CWI's advisory report (see also questions 3 and 4). More information about how Amsterdam UMC processes personal data can be found on their website and in the privacy policy made available internally.

The VU has entered into processing agreements with the suppliers of the IT systems through which personal data is processed. This ensures that your personal data is processed carefully, securely, and in accordance with the General Data Protection Regulation (GDPR) and the General Data Protection Regulation Implementation Act (UAVG). The VU remains responsible for these processing operations.

6. Is there any automated decision-making with regard to my personal data?

No automated decision-making takes place within the complaints procedure.

7. How long will my personal data be stored?

The entire CWI file will be retained for 10 years after completion of the CWI advisory report. This file includes:

- a. the decision of the EB or of the EB and BOD together;
- b. the decision memorandum;
- c. the CWI advisory report with appendices;
- d. the correspondence conducted within the procedure;
- e. reports of the hearing(s);
- f. the written documents provided to the CWI by the complainant and the defendant.

The retention period is the same as the period for the personnel file. After this period has expired, most of the file is destroyed.

Only the decision under a) and the advisory report under c) are anonymized and retained for an additional period of 60 years. The reason for this is reuse: it must be possible to compare cases over a long period of time, as they differ greatly from one another.

8. How is my personal data protected?

VU takes the protection of your personal data seriously and takes appropriate technical and organizational measures to protect your personal data against loss or any form of unlawful processing. For example, an authorization policy applies, employees have a duty of confidentiality, and logging and monitoring take place.

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

If you have any questions or comments about how your personal data is processed within the complaints procedure, please contact the secretary of the CWI.

10. How can I exercise my privacy rights?

Under the General Data Protection Regulation (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 have your personal data deleted;
- to restrict the processing of your personal data; and
- to object to the processing of your personal data.

If you wish to exercise your privacy rights, you can submit a request to the Data Protection Officer (DPO) of VU via:

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

In order to process the request, the DPO will ask for valid proof of identity. This is to verify that the request has been made by the right person.

You also have the right to lodge a complaint with the Dutch Data Protection Authority at any time about the way in which your personal data is processed by VU. More information about your rights can be found at: [Rights of data subjects - Dutch Data Protection Authority](#).
