

GDPR policy at DMJX: Journalist exemptions

In relation to GDPR, students under education who work with journalism may have one of the two following roles:

1. As 'student' who is allowed to play and exercise without the public having access. Conversely, the student may only collect and share information on individuals under the general GDPR rules. The student is accountable to the Datatilsynet. (Danish Data Protection Agency).
2. As 'journalist', the student is exempted from most of the general GDPR rules. However, the student is responsible to readers, and they must therefore publish their productions in a registered mass medium.

There is no possibility of 'mixed use' where the student, in secret, processes personal information which is only shared with the tutor and co-students and thus circumvents the GDPR.

When the student is 'studying':

This is typically the case with basic subjects (foundation subjects) but also in a number of situations in Journalistic Method where the student does not work towards publishing a specific journalism product: for example, concept development, target group analysis, internal exercises etc.

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The student may only collect, save, process, and share information that relates to specific individuals with the consent of these individuals. Read more about consent here:

[www.datatilsynet.dk/Media/0/C/Samtykke%20\(3\).pdf](http://www.datatilsynet.dk/Media/0/C/Samtykke%20(3).pdf)

Please note, that consent must be given by all individuals that information is saved from, not only from sources. Note also, that consent can be withdrawn at any time following which the information must be deleted. Subsequently, all involved individuals may request insight into what information the student has saved. In addition, the information may not be saved beyond the time and purpose for which the consent has been given.

A number of rules on data security apply when processing personal information. These are further explained in DMJX's guidelines on data processing.

When the student is a 'journalist':

This is generally the case when the student actually works as a member of an editorial staff that publishes on a publicly accessible platform that is registered with the Pressenævnet (Danish Press Council) and Datatilsynet. Presently, we have two of these platforms: Medijungle.dk and StudentsTV.dk. That is to say, a kind of 'school internship'.

In these cases, the students' work is exempted from most of the rules in the GDPR and the Data Protection Act and consent is not required to process personal information. Similarly, individuals may not demand their information be erased unless there has been a breach of press ethics or the law.

The student must work towards a specific journalist product that is expected to be published in the media. One example, is the local authority sites which are produced on the course JM2, e.g:

<https://viborgindefra.mediajungle.dk/>

It is not a requirement that everything is published. Just as on a commercial editorial staff, the poorest products can be rejected, but purely from an editorial assessment.

The rules on data security also apply here, as it must be ensured that personal information is used exclusively by the journalist/editorial staff and therefore for the journalism purpose.

Thomas Pallesen (Program of Journalism)

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