

## EU-CONEXUS PRIVACY POLICY

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EU-CONEXUS partners (La Rochelle Université, Agricultural University of Athens, Technical University Of Civil Engineering Bucharest, Klaipeda University, La Universidad Católica De Valencia “San Vicente Mártir, University of Zadar) and associated partners (Waterford Institute of Technology, University of Rostock and Frederick University) pay particular attention to the protection of your personal data and total transparency as to their use.

In this regard, this policy sets out both the way in which your personal data, as a data subject will be processed, the rights you have as a data subject and the way in which they will be protected.

Any changes made to this Privacy Policy can be found by visiting our website: <https://www.eu-conexus.eu/en/privacy-policy/>

EU-CONEXUS partners undertake to respect the General Data Protection (EU) Regulation 2016/679 (GDPR).

Personal data will be processed lawfully, fairly and transparently.

The personal data that is processed is accurate and is updated as necessary. Those data that are not the correct ones are deleted or corrected without delay. Project participants have the right to request at any time correction of your personal data being processed

Personal data is stored in a form that allows the identification of project participants and only to that extent as long as necessary for the purposes for which personal data are processed. Exceptionally, personal information may be stored for longer periods, but only if it will be processed exclusively for archiving purposes in public interest, for the purposes of scientific research, for statistical purposes or if any legitimate interest.

Personal data shall be processed exclusively in a manner that ensures adequate security of personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage by the application of appropriate technical or organizational measures.

Where the processing of personal data is based on consent, it must be given voluntarily, in writing, in an understandable and easily accessible form using clear and simple language.

Prior to giving consent, the person must be informed of the right to withdraw consent at any time.

### Chapter I: The category of data collected

The personal data that we collect on digital or paper media are mainly the following:

- Identity data (for example: Last Name, first name, address, photo, date and place of birth, e-mail, IP authentication, username, etc.)
- Data relating to personal life (for example: lifestyle, consumption habits, leisure activities,

family situation, etc.)

- Data relating to professional life (for example: CV, diplomas, training, function, place of work, etc.)
- Economic information (for example: banking data, social rights, financial situation, etc.)

More details are on the register, available on [the EU-CONEXUS website](#).

You will find on the register, available on [the EU-CONEXUS website](#), more detailed information on the processing we carry out on your personal data. In particular concerning:

- The purposes of the processing,
- The legal bases allowing their processing,
- Their retention periods,
- Their recipients,
- If applicable, their transfer to a country that is not a member of the European Union,
- The security measures.

## Chapter II: Purposes of data collection

By providing your personal data, as the data subject you expressly and unequivocally agree to the use by the EU-CONEXUS, through the Partner Universities, of the data collected for the following purposes:

### For students:

- Subscription to the EU-CONEXUS newsletter,
- To contact you in order to present our educational offer, or to start the necessary steps to sign a contract, in the event of any problems or situations arising in the teaching activity, in which case we will need (see register here),
- To take your complaints and / or suggestions and your online requests and respond appropriately,
- Provide the student with a multi-service student card allowing him to access the services implemented by EU-CONEXUS partners,
- Allow consultation of the student's educational file,
- Allow the student to access and use the educational platforms hosted by each partner,
- Allow the student and teachers to access to EU-CONEXUS virtual environment and platforms developed by the partners (for example: Moodle, Big Blue Button, POD – hosted by EU-CONEXUS partners and other services such as the mentoring platform or job teaser hosted by external companies),
- Provide learners with educational and pedagogical content as well as online documentation,
- Provide learners with information relating to school life, teaching and the functioning of the establishment,
- Retention of student files,
- Monitoring of the evolution within the alliance,
- Disabilities mapping,

- Administrative and pedagogical registration of students,
- Administrative and pedagogical registration of students in LRUniv,
- To implement teaching and learning of EU-CONEXUS programmes (courses),
- Application and admission procedure,
- Administration and implementation of student,
- Student registration to the bilateral PhD,
- Registration and participation in the school contest and related activities,
- To register and to issue attendance/training certificates; statistics,
- To do a mentor's list.

## **For staff:**

- For the recruitment / recruitment process, when applying online or in person, at the EU-CONEXUS headquarters or Partner Universities, for one of the positions put up for competition, in which case we will need your name, surname, address, landline / mobile phone number, e-mail address and other personal data, according to the legislation of the countries to which the EU-CONEXUS Partner Universities belong,
- Creation of accounts to access the collaborative platform,
- integration/creation/modification of aliases,
- Disabilities mapping,
- To register the participants to events,
- Adequation of study programme to labour market needs,
- Monitoring of the evolution of staff mobility within the alliance,
- To keep the contact with the stakeholders,
- To support the project interactions and get feedback on the mentorship projects,
- Access to the digital environment for teachers,
- Subscription to the EU-CONEXUS newsletter,
- Monitoring of the website statistics,
- Determination of Gender pay gap,
- Determination of numbers of men and women in these groups MSc, PhD, postdoc,
- Realisation of a mapping of national research policy and funding environments,
- Development of a research community,
- Creation of Database of Human Resources,
- Creation of Joint Research Infrastructures across EU-CONEXUS,
- The development of a common policy and strategy for access to joint infrastructures and services,
- Collaboration opportunities (to find partners within consortium and beyond for joint inventions, licensing opportunities (to find consumers from business/industry to make a licensing deals).

## Chapter III: Data recipients

Can be recipients of this data within the limits of the need to know:

- Services in charge of registrations and learners from each member University,
- All Moodle platform users (students, teachers, technical staff),
- Teachers and teaching teams,
- Student associations,
- Any other internal service: accounting, management control, technical,
- Learners and users of the training offered by the establishment, with regard to their personal information,
- Teacher-researchers, researchers and teachers (local or external), with regard to the training of their learners and their research work,
- Social organisations,
- Organizations linked to student life,
- Universities and schools,
- Ministry of Higher Education and Research from each partner,
- Suppliers offering third-party services via the EU-CONEXUS smart campus.

We pay attention to working only with partners capable of ensuring an adequate level of protection of your personal data. We only disclose your personal data to third parties when we are legally required to do so. We may disclose your personal data to third parties if you have consented to it or if there are other legal grounds.

## Chapter IV: Data retention period

The personal data that we collect are kept for a period that does not exceed the period necessary for the purposes for which they were collected in compliance with the requirements of the national legislation of the countries to which the EU-CONEXUS partner Universities belong.

The data will be treated in compliance with the requirements of the national legislation of the countries to which the EU-CONEXUS partner Universities belong.

For more details on the retention period of your data, please consult the register available on the [EU-CONEXUS website](#).

## Chapter V: Data security

EU-CONEXUS gives great importance to the security and integrity of your personal data.

Thus, and in accordance with the GDPR, we undertake to take all the necessary precautions to preserve the security of your data, and in particular to protect them against any alteration, destruction, loss, distribution or unauthorized access, as well as against any other form of unlawful processing or communication to unauthorized persons.

## Chapter VI: Data breach

In the event of a personal data breach collected and processed by EU-CONEXUS, EU-CONEXUS undertakes to inform the administrative authorities responsible for ensuring the protection of personal data in each country that is member of EU-CONEXUS.

If such breach poses a high risk to learners, EU-CONEXUS notifies the persons concerned by e-mail.

## Chapter VII: Your rights

In accordance with the General Data Protection Regulation (EU) 2016/679 of April 27, 2016 known as “RGPD”, you have the following rights that can be exercised by a written request, signed and dated, sent to our headquarters or to the email addresses presented on Chapter IX, from this privacy policy.

- a right of access (Article 15 of the GDPR): right to obtain confirmation that your data is being processed or not
- a right of rectification (Article 16 of the GDPR): right to obtain, as soon as possible, that inaccurate data concerning you be rectified and that incomplete data be completed
- a right to erasure (article 17 of the GDPR): right to obtain the erasure of data concerning you if you have withdrawn your consent to the processing, when you object to it, when the data are no longer necessary for the purposes of the processing, when they have been the subject of unlawful processing, or when they must be erased by virtue of a legal obligation. The right to erasure is not an absolute right. EU-CONEXUS reserves the right not to follow up the exercise of the right of erasure without violating the GDPR and national law from partner countries.
- a right to limit processing (article 18 of the GDPR): right to obtain restriction of processing, in particular if you dispute the accuracy of the data, when their processing is unlawful, or if you need it for the assessment, the exercise or defense of your legal rights
- a right of opposition (article 21 of the GDPR): right to object at any time to the processing of data, except when this is necessary for the performance of a task of public interest or for the purposes the legitimate interests of the data controller, and the right to object to the processing carried out for prospecting purposes
- a right to portability (article 20 of the GDPR): the right to receive the data in a structured, commonly used, machine-readable format, and to transmit them to another controller without the initial controller there obstruct, when the processing is based on consent or on a contract, and carried out using automated processes
- a right of complaint to the administrative authority of the EU-CONEXUS countries:
  - in France : If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dpo@univ-lr.fr](mailto:dpo@univ-lr.fr). If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the

following address: CNIL - Complaints Department, 3 Place de Fontenoy , TSA 80715  
- 75334 Paris Cedex 07.

- in Spain: If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dpd@ucv.es](mailto:dpd@ucv.es). In case of non-satisfactory response from the UCV responsible, then this person has to communicate with the Spanish agency for data protection (Agencia Española de Protección de datos), C/ Jorge Juan, 6. 28001 - Madrid, Tel. +34 91 266 35 17

- in Greece: If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dpo@aua.gr](mailto:dpo@aua.gr). In case of non-satisfactory response from the AUA responsible, then this person has to communicate with the Hellenic Data Protection Authority (HDP), Kifissias 1-3, PC 115 23, Athens, Greece C, telephone: +30-210 6475600 and e-mail: [contact@dpa.gr](mailto:contact@dpa.gr).

- in Croatia: If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [gdpr@unizd.hr](mailto:gdpr@unizd.hr). In case of non-satisfactory response from the UNIZD responsible, then this person has to communicate with the Croatian Personal Data Protection Agency (AZOP), Selska cesta 136, 10 000 Zagreb, Croatia, e-mail: [azop@azop.hr](mailto:azop@azop.hr)

- in Romania: If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dpo@utcb.ro](mailto:dpo@utcb.ro). In case of non-satisfactory response from the UTGB responsible, then this person can communicate with the Romanian Data Protection Authority: ANSPDCP – [dataprotection.ro](mailto:dataprotection.ro), [anspdcp@dataprotection.ro](mailto:anspdcp@dataprotection.ro), address: B-dul G-ral. Gheorghe Magheru 28-30, Sector 1, București, România. Tel.: +40.318.059.211.

- in Lithuania: If a data subject considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dpo@ku.lt](mailto:dpo@ku.lt). In case of non-satisfactory response, then this person can communicate with the State Personal Data Protection Inspectorate in accordance with the provisions of Article 77 of the Regulation (EU) 2016/679. Email: [ada@ada.lt](mailto:ada@ada.lt)

- in Ireland : If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [dataprotection@wit.ie](mailto:dataprotection@wit.ie) If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: Data Protection Commission, Office of the Data Protection Commission, 21 Fitzwilliam Square , Dublin 2 , D02 RD28

- in Germany : If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: [info@datenschutz-mv.de](mailto:info@datenschutz-mv.de)

If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: Der Landesbeauftragte für Datenschutz und Informationsfreiheit Mecklenburg-Vorpommern, Werderstraße 74a, 19055 Schwerin

- in Cyprus : If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: XXXX@XXX If a person considers that the processing of personal data concerning him or her does not comply with European data protection regulations, this person can send a complaint to the following address: **Name and address of the authority**

- a right to an effective judicial remedy against a supervisory authority (article 78 of the GDPR).

## Chapter VIII : EU-CONEXUS website information

The following information is collected on the [EU-CONEXUS website](#):

- data of the data subject's computer, data on visits to and use of the University website (IP address, type of browser, location from which you were directed, duration of visits and number of page views);
- when the data subject fills in various data collection forms provided on the University websites,
- any other data sent by the data subject to EU-CONEXUS.

EU-CONEXUS websites use the Google Analytics collection and analysis system, which provides information about the use of the website. The system uses cookies stored on users' computers. Google Analytics is used to generate reports on the use of this website. This information will be kept by Google in accordance with Google's privacy policy.

Personal data provided by the data subject on the EU-CONEXUS websites will be used for the following purposes:

- For sending EU-CONEXUS newsletters (with the consent of the data subject),
- Adapting EU-CONEXUS websites to the personal needs of browsers,
- providing statistical information on the number of visitors to the EU-CONEXUS website to third parties (without personal information).

## Chapter IX: Contact

For any request or for information (for storing, for editing, for deleting...) concerning the privacy policy of EU-CONEXUS, complaints/notifications/requests can be sent to EU-CONEXUS Partner Universities by using the [contact form on website](#).

You can also send an email to the Data Protection Officer from your home university:

For La Rochelle Université (France) : [dpo@univ-lr.fr](mailto:dpo@univ-lr.fr)

For La Universidad Católica de Valencia (Spain): [dpo@ucv.es](mailto:dpo@ucv.es)

For the Agricultural University of Athens (Greece): [dpo@aua.gr](mailto:dpo@aua.gr)

For the University of Zadar (Croatia): [gdpr@unizd.hr](mailto:gdpr@unizd.hr)

For the Technical University Of Civil Engineering Bucharest (Romania): [dpo@utcb.ro](mailto:dpo@utcb.ro)

For Klaipeda University (Lithuania): [dpo@ku.lt](mailto:dpo@ku.lt)

For Waterford Institute of Technology (Ireland) : [dataprotection@wit.ie](mailto:dataprotection@wit.ie)

For University of Rostock (Germany) : [datenschutzbeauftragte@uni-rostock.de](mailto:datenschutzbeauftragte@uni-rostock.de)

For Frederick University (Cyprus) : [XXX@XXX](mailto:XXX@XXX)

## Chapter X: Changes to the privacy policy

EU-CONEXUS reserves the right to change this policy unilaterally whenever it seems necessary and/or for example following relevant legislative changes. In the event of changes to this Privacy Policy, EU-CONEXUS will make them known through the website: <https://www.eu-conexus.eu/> and on websites of Partner and associated partner Universities by updating the posted Privacy Policy document. We encourage users to check those pages regularly for updates on the latest Privacy Policy.

