

## EU-CONEXUS PRIVACY POLICY (June 2025)

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EU-CONEXUS partners (La Rochelle Université, Agricultural University of Athens, Technical University of Civil Engineering Bucharest, Klaipeda University, Catholic University of Valencia, University of Zadar, South East Technological University, Rostock University 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.

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 I : Purposes of data collection**

The EU-CONEXUS website may process all or part of the data:

- to enable navigation on the site and the management and traceability of services ordered by the user: connection and site usage data, language of the browser used, etc.
- to improve navigation on the Site: connection and usage data
- to respond to requests for information via the form
- to follow up on all requests

EU-CONEXUS does not sell your personal data which is therefore only used out of necessity or for statistical and analysis purposes.

### **Chapter II : The category of data collected**

The personal data that we collect are mainly the following (see the detailed list into the data register):

- Identity data (Name, e-mail, telephone number, IP authentication, username, etc.)
- Personal data possibly contained in the information request message
- Data relating to professional life (function, place of work, etc.)
- Connection data
- Any specific data related to the call, event, workshop, study offer etc

EU-CONEXUS ensures compliance with the principle of minimization and thus collects and processes only the personal data necessary for the purposes for which they are processed.

### **Chapter III : Data recipient**

As part of the processing of your data, EU-CONEXUS may transmit or give access to your data to different categories of recipients :

- EU-CONEXUS staff members: personal data is transmitted to process the purposes previously mentioned,
- Support service providers (technical and logistical) in order to carry out their services.

In any case, EU-CONEXUS undertakes not to transfer personal data to unauthorized third parties.

EU-CONEXUS may, however, be required to communicate personal data to comply with a legal obligation, at the request of an administrative or judicial authority which requests it (such as National education authority, European Commission in the framework of the project audit, ...) or for the exercise of a legitimate interest such as the defense of his rights. 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.

In the event that personal data is transferred to a country outside the European Union, EU-CONEXUS undertakes to put in place the appropriate safeguards in accordance with the GDPR, such as the use of standard contractual clauses adopted by the European Commission or any other measure ensuring an adequate level of protection.

#### **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 (such as cryptography, pseudo or anonymisation and other technical methods,.... detailed in the data register), 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 within 72 hours 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, 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 nonsatisfactory 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 UTCTB responsible, then this person can communicate with the Romanian Data Protection Authority: [anspdcpcdataprotection.ro](mailto:anspdcpcdataprotection.ro), [anspdcpcdataprotection.ro](mailto:anspdcpcdataprotection.ro), address: B-dulG-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: [dpo@setu.ie](mailto:dpo@setu.ie) In case of non-satisfactory response, then this person can communicate with: 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). In case of non-satisfactory response, then this person can communicate with : 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: [dpo@frederick.ac.cy](mailto:dpo@frederick.ac.cy). In case of non-satisfactory response, then this person can communicate with: Office of the Commissioner for personal data

protection, kypranoros 15, Nicosia 1061, Cyprus,  
[commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)

- 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 uses Google Analytics to analyze the website audience. To ensure compliance with the GDPR, we have enabled IP address anonymization and we ensure that the data collected is hosted within the European Union whenever possible, and when necessary, the data is stored by Google in accordance with its privacy policy.

When you first visit our website, an information banner allows you to accept or refuse the use of non-essential cookies, in accordance with the requirements of the GDPR and the ePrivacy Directive. You can change your preferences at any time by accessing our cookie manager via the link at the bottom of the page.

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 Catholic University of Valencia (Spain): [dpd@ucv.es](mailto:dpd@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) : [dpo@setu.ie](mailto:dpo@setu.ie)
- For University of Rostock (Germany) : [datenschutzbeauftragte@uni-rostock.de](mailto:datenschutzbeauftragte@uni-rostock.de)
- For Frederick University (Cyprus) : [dpo@frederick.ac.cy](mailto:dpo@frederick.ac.cy)

### **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 Universities by updating the posted Privacy Policy document. We encourage users to check those pages regularly for updates on the latest Privacy Policy.