

# PRIVACY STATEMENT

In the course of processing of personal data collected for the purposes of executing the ERASMUS Mundus MESPOM Program (“Program”), the MESPOM Consortium (“Consortium”) institutions, including CEU PU (Vienna, Austria), Lund University (Sweden), the University of Manchester (UK), the University of the Aegean (Greece) (“Institutions”) are committed to preserving the privacy of natural persons participating in the Program. As the management of the Program will require the recording and further processing of personal data by the Institutions, all personal data are dealt with in accordance with the applicable European data protection laws.

The following Privacy Statement outlines the details how the Consortium and the Institutions collect, manage and use the personal data in the context of managing the Program.

## 1. Who is responsible for collecting and processing of personal data (data controller)?

The data controller is the Consortium (“Data Controllers”) of the following institutions:

### **Central European Private University**

QUELLENSTRASSE 51, WIEN 1100, Austriacoordinator [at] mespom [dot] eu

### **Lund University (Sweden)**

Paradisgatan 5c, LUND22100, Swedenmsc.program [at] iiiiee [dot] lu [dot] se

### **University of Manchester (UK)**

OXFORD ROAD, MANCHESTER M13 9PL, United Kingdom  
earth [dot] support [at] manchester [dot] ac [dot] uk

### **University of the Aegean (Greece)**

LOFOSPANEPISTIMIOU, MYTILINI 81100, Greece  
secr-env [at] aegean [dot] gr

The Consortium partner Institutions qualify as joint data controllers according to Article 26 of the GDPR because they are the founding and operating institutions of the Program, while the everyday operation of Program is managed by the Coordinating Institution (CEU PU) who is in charge for running the application activities and diploma awarding process. The Coordinating Institution acts on behalf of and under the instructions of the joint data controllers when implementing their decisions regarding the purposes and means of data processing. Thus, Coordinating Institution, representing the data controllers, collects, uses and stores all the personal data collected during the application and degree award processes with applicants and students involved in the Program. Most of the personal data the Coordinating Institution holds is obtained directly from you when you apply for and/or participate in the Program, or otherwise interact with the Coordinating Institution or a Consortium partner Institution.

## 2. What personal data are processed and for what purpose?

Personal data processed concern the persons who apply and/or participate in mobility projects in the context of the Program managed by the Consortium. The provision of some data may be mandatory, and some data may be optional.

<b>Processing activity</b>	<b>Purpose of data processing</b>	<b>Category of personal data</b>	<b>Legal basis</b>
Use of contact details	Communicating with applicants, checking eligibility	name, gender, place of birth, citizenship, place of residence, disability status, emergency contact, full contact details, including email address,	GDPR 6. § (1) b) contractual relationship
Selection process	Collecting applications, Categorization of person/status Sharing applications with the Academic Board members Reviewing, evaluating applications Checking eligibility	- qualifications and academic records, employment data, name and contacts of referees - work experience data (employer name, job title) - copy of supporting documents (CV, Statement of Purpose, academic records, reference letters, English language certificate) - data on institution delivering previous degree, university of origin, country of university - evaluation (score)	GDPR 6. § (1) b) contractual relationship
Decision	Selecting a candidate for the Program (Selection Committee)	Name, information collected during the selection process, evaluation score	GDPR 6. § (1) b) contractual relationship
Data related to scholarship/fellowship category and eligibility	Selecting a candidate for EM or other grant/stipend (Selection Committee)	Name, application to other EM scholarships, time spent in EU countries, residence certificate, address, citizenship	GDPR 6. § (1) b) contractual relationship
MESPOM Student Agreement	regulating the details of the Program	Name, permanent address, citizenship, date of birth, financial aid/tuition and other fee details, program specific information	GDPR 6. § (1) b) contractual relationship
Provision of the grant	bank transfer	Name, date of birth, place of birth, citizenship, scholarship details of the students, enrollment status, bank account holder's full name, address, bank name, bank address: IBAN/bank account number, SWIFT/BIC code, ABA routing number, currency of bank account.	GDPR 6. § (1) b) contractual relationship
Study records	exchange of study related data necessary for the issuance of the joint	- disciplinary, attendance and study progress records, academic ranking, grades, enrollment status, data related to courses, like title, code and credit	GDPR 6. § (1) f) Legitimate interest of data controllers

	degree and progression report	<ul style="list-style-type: none"> <li>- proof of health status/sick note if submitted to the MESPOM Academic Board</li> <li>- study related requests (e.g. extension, leave of absence) submitted to the MESPOM Academic Board</li> <li>- degree certificates, transcripts,</li> <li>- joint master diploma supplements.</li> <li>- Study Visit Policy Brief, Thesis Report, Thesis student papers and evaluations</li> <li>- subject of study/research topic</li> </ul>	
MESPOM Information and Communication tools	Provision of access to online education and communication platforms (MESPOM Student Space, Google Apps Education Edition, other e-learning platforms).	e-mail address(es) created for the use of these tools, student activity and student generated material	GDPR 6. § (1) f) Legitimate interest of data controllers
insurance for the program	during the MESPOM program the students' health insurance is covered by the program	name, gender, date of birth, e-mail address, citizenship, type of insurance, start and end date,	GDPR 6. § (1) b) contractual relationship
Management of mobility between consortium partners	coordinate mobility of students between partners, ensure the study program and the degree issuing process	<ul style="list-style-type: none"> <li>-hosting institutions' enrollment and registration data</li> <li>- arrival and departure dates from host institutions</li> <li>- Erasmus Study Mobility related data, such as course titles, codes and credits</li> </ul>	GDPR 6. § (1) f) Legitimate interest of data controllers
Reduction of scholarship	if the student does not meet the minimum mobility requirements, the grant will be proportionally reduced	name, amount of grant, evidence on the breach of minimum mobility requirements, decision, amount of reduction,	GDPR 6. § (1) f) Legitimate interest of data controllers
Dispute resolution	MESPOM internal institution involved in dispute resolution between a student and a Consortium member university	name, subject of the dispute, evidence, any material or information share by the student	GDPR 6. § (1) f) Legitimate interest of data controllers
Project reporting requirements	financial follow-up and monitoring of the grant agreements	Budgetary data, distribution and expenditure of resources	GDPR 6. § (1) f) Legitimate interest of data controllers

Content generated by the students the <a href="https://mespom.eu">https://mespom.eu</a> website	publishing blogs and/or news to the <a href="https://mespom.eu">https://mespom.eu</a> website	first name or full name, photo, mobility track, text	GDPR 6. § (1) a) consent of the individual
Information on the student representatives	Publishing information on the students' representatives on the <a href="https://mespom.eu">https://mespom.eu</a>	name, mobility track, Program	GDPR 6. § (1) a) consent of the individual
Providing program specific information	Responding to email requests	email address, name, request, personal data provided by the individual	GDPR 6. § (1) f) Legitimate interest of data controllers
MESPOM Alumni Association	Providing information to former MESPOM students (newsletter)	name, MESPOM email address	GDPR 6. § (1) f) Legitimate interest of data controllers

In addition, during the mobility phase, the Consortium is requested to report to the Education, Audiovisual and Culture Executive Agency (“EACEA” or “Agency”) of the European Commission on: name, gender, date of birth, citizenship, place of residence, disability status, email address, number of payments, amounts received by recipients, number of ECTS acquired and grade, graduation date, name of degree(s) obtained, type of degree, mobility data (time periods spent in each institution and type of activity).

More information on how the Agency further uses your personal and study related data, please check the [https://ec.europa.eu/research/participants/data/support/legal\\_notice/h2020-ssps-grants-sedia\\_en.pdf](https://ec.europa.eu/research/participants/data/support/legal_notice/h2020-ssps-grants-sedia_en.pdf) website.

The Consortium will prepare statistical information that only contains anonymous information on the individuals included (such as nationality and gender).

### 3. Who has access to your personal data and to whom may it be disclosed?

For the purposes detailed above, access to parts of the personal data is given to the following recipients:

- Consortium institutions
- Education, Audiovisual and Culture Executive Agency of the European Union.

For specific activities linked to the implementation of the Program (e.g. the support to students' visa requests or the organization of pre-departure briefings) a limited set of information about the participants (such as name, nationality, gender and email address) may be provided to the European Commission services, the EU Delegations, the Erasmus+ National Agencies and National Erasmus + Offices.

A limited set of information about the participants (such as names, nationality, gender, e-mail) may also be directly provided to the Erasmus Mundus Students and Alumni Association (EMA) in order to support their activity.

The health insurance valid for the Program is provided by Expat & Co (Assesteenweg 65, 1740 Ternat, Belgium), personal data indicated in the relevant part of section 2. is transferred to the service provider. Personal data related to claims, or any other issues will only be processed by the insurance service provider.

Personal data that is requested for the preparation, signing, completion or termination of the student agreement with you and the execution of the Program will only be shared with the unit or employee responsible for the relevant tasks of the Consortium partner Institution, except you instruct otherwise.

We share only those data with external parties which are needed to perform the specific service and we require a data processing agreement to be signed before any data transfer. We require all third parties and data processors to respect the security of your personal data and to treat it in accordance with the local privacy law.

Our data processor:

- Microsoft (Office 365): Based in the US, with CEU's data stored within EU in data centers located in Amsterdam and Dublin. Software as a Service which provides CEU's email and document management.
- Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland): operation of Google Education Suite for the MESPOM program under the @mespom.eu domain.

For further information on the potential personal data transfer that might occur to your data that was transferred to the Agency by the Consortium, please check

[https://ec.europa.eu/research/participants/data/support/legal\\_notice/h2020-ssps-grants-recipient\\_en.pdf](https://ec.europa.eu/research/participants/data/support/legal_notice/h2020-ssps-grants-recipient_en.pdf)

No personal data is transmitted to parties which are outside the recipients and the legal framework mentioned. The Consortium and the Institutions will not share personal data with third parties for direct marketing.

#### **4. How do we protect and safeguard your information?**

The collected personal data and all related information are stored on the premises and on servers of a computer center of the Data Controllers. The Data Controllers' premises and operations of all computer centers abide by the data protection provisions as applicable in the European Union.

#### **5. How long do we keep your personal data?**

Personal data should stay in the Coordinating Institution's system during the lifetime of the Program and the reporting for projects linked to this.

Your personal data are kept for the following periods

- Files relating to grant procedures, mobility, educational activity or reporting, including personal data, are to be retained during the Program and for a period of 5 years after the closure of the grant agreement. (31 December 2033)
- Until the end of a possible audit, if started before the end of the above-mentioned period.
- Post, news articles prepared by you will be published on the <https://mespom.eu> website during the Program and for a period of 5 years after the closure of the grant agreement. (31 December 2033)
- Student representative's data will be published on the <https://mespom.eu> website during the tenure of the role.
- After the period mentioned above has elapsed, the files containing personal data are sampled to be sent to the historical archives of the Commission for further conservation. The non-sampled files are destroyed.

## **6. Your right to have recourse in case of conflict on any personal data issue**

You have a right

- to access your personal information – you can obtain a confirmation that we are processing your data and information how we process it. We suggest that you make a request in writing.
- to object to the processing of your personal information – this allows you to ask us to stop processing your data at any time. Where we rely on legitimate interest, you must give specific reasons why you are objecting the processing of your data. In this case this is not an absolute right, we can demonstrate compelling legitimate grounds for processing, which override your interests, rights and freedoms. Where we are processing personal data for scientific or historical research, or statistical purposes, you only have a right to object if our lawful basis for processing is legitimate interest.
- to rectify – you have a right to have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- to erase (also known as the right to be forgotten) – in certain circumstances you can ask for the data we hold about you to be erased from our records. Your personal data will be erased where the data are no longer needed for their original processing purpose, or you have withdrawn your consent and there is no other legal ground for processing, or you have objected and there are no overriding legitimate grounds for the processing, or erasure is required to fulfill a statutory obligation under the EU law or the right of the national law.
- to request data portability – you can ask to have the data we hold about you transferred to another organization.
- to restrict processing your personal information – where certain conditions apply, you have a right to restrict the processing of your personal information.
- to withdraw your consent at any time – without affecting the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise any of these rights, please email [privacy@ceu.edu](mailto:privacy@ceu.edu) or write to us at Central European University, Quellenstrasse 51, 1010 Vienna.

The Consortium will make every effort to fulfill your request to the extent allowed by law and will respond in writing within 30 days of receiving your request.

Should you wish to request help from the relevant national authority, you can find their contact details here: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

In case you face a personal data protection issue with the Agency you can also contact EACEA's Data Protection Officer at the following email address: [eacea-data-protection@ec.europa.eu](mailto:eacea-data-protection@ec.europa.eu) .

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