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## PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

**Processing operation:** Erasmus for Young Entrepreneurs IT Tool and Website

**Data Controller:** European Commission – Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) / Directorate D, Networks and governance / Unit D2, Industrial forum, alliances, clusters (hereinafter “DG GROW D.2” or “the Data Controller”)

**Data Processors:**

1. European Innovation Council and Small and Medium-sized enterprises Executive Agency (EISMEA)
2. Support Office, contractor in charge of coordinating the Programme
3. Intermediary Organizations (IO) – Commission or EISMEA grant beneficiaries, in charge of running the Programme at local level

**Record reference:** DPR-EC-00591

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### 1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation “Erasmus for Young Entrepreneurs IT Tool and Website” undertaken by the Data Controller is presented below.

## **2. Why and how do we process your personal data?**

The Data Controller and the Data Processors process your personal data to enable the roll-out of Erasmus for Young Entrepreneurs Programme.

Data processing through the IT Tool:

1. The IT Tool aims to support the process of the Programme, particularly **the registration, the selection and matching of the new and host entrepreneurs** (see [www.erasmus-entrepreneurs.eu](http://www.erasmus-entrepreneurs.eu) for more information).
2. Furthermore, it is used to collect, store and treat information about all involved parties in order to enable the Support Office, DG GROW and EISMEA to manage the Programme – including **payments and audits**.
3. It is also used to extract **data for statistics** on the progress and status of each registered entrepreneur and each relationship that has been initiated or is in progress.
4. In addition, the IT Tool is used to collect and store entrepreneurs’ **feedbacks on the relationships** that have been concluded as well as **feedbacks on the long-term impact** of Erasmus for Young Entrepreneurs Programme on the entrepreneurs.
5. The information provided by the entrepreneurs can also be treated for **possible future participation in promotional activities** as well as for **publication on promotional brochures, programme social media pages and programme Website (e.g. success stories)**. In case of publication of private data, an additional consent will be requested to the parties involved.

Data processing through the Website:

1. The Helpdesk feature provided on the Erasmus for Young Entrepreneurs Website collects, stores and treats users’ information with the scope of ticketing users’ enquiries, draw statistics on the types of issues and later answer to the enquiries received.
2. The programme Website stores and displays information on all active Intermediary Organisations, including personal contact details (i.e. name, email address, phone number) of their relevant staff, in order to allow potential participants to contact the Intermediary Organisations for further information about the programme. In case of publication of private contact details, a specific consent will be requested to the relevant persons.

Your data will not be used for an automated decision-making, including profiling.

## **3. On what legal ground(s) do we process your personal data**

We process your personal data, because processing is necessary for achieving the purposes as described under section 2 and to comply with the legal obligations (Article 5(1)(b) of Regulation (EU) 2018/1725), in particular:

- Article 173 of the Treaty on the Functioning of the European Union; and
- Article 12, in combination with Recitals 14 and 24, of Regulation (EU) No 1287/2013 of the European Parliament and of the Council of 11 December 2013 establishing a

Programme for the Competitiveness of Enterprises and small and medium-sized enterprises (2014-2020).

Processing operations necessary for your participation in the programme, publication of personal data on promotional materials or the programme social media pages and Website and operations linked to pictures, photos, video/voice recordings take place based on the explicit consent of the data subject. The data subjects give their consent via a clear affirmative act.

#### **4. Which personal data do we collect and further process?**

In order to carry out this processing operation, the Data Controller obtains your personal data from the Erasmus for Young Entrepreneurs IT Tool or from the Erasmus for Young Entrepreneurs Website. In particular, we process the following personal data for the purposes described above:

From your EU Login (mandatory data):

- Your surname
- Your given name
- Your EU Login ID
- Your email address

From your Profile Page in the IT Tool (mandatory data):

- Your last name
- Your first name
- Your date of birth
- Your company name
- Your address and zip code
- Your telephone number
- Your email address
- Your CV
- Your Business Plan (only in case of New Entrepreneurs)
- The duration of your previous working or entrepreneurial experience
- The information you provide regarding your motivation to participate in the programme
- The information you provide regarding your study or work experiences abroad (only in case of New Entrepreneurs)
- Your mother tongue and any other language you speak
- Your main business sector
- Your preferred target country for the exchange
- Your preferred duration of the exchange
- How you heard about the programme

From your Profile Page in the IT Tool (non-mandatory data):

- Your fax number (if any)
- Your website (if any)
- Your Skype ID (if any)
- Data on special needs (e.g. personal disabilities), leading to specific management of the person's registration to the Erasmus for Young Entrepreneurs Programme

From the Helpdesk:

- Your email address
- The content of your enquiry

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

The Data Controller processes and keeps your personal data for the time necessary to fulfil the purposes as described under section 2 and for the time necessary to fulfil its audit obligations. Therefore, your personal data will be anonymised **at the latest** after 10 years.

The non-mandatory data mentioned above can be deleted at any moment upon your request, as it is not necessary for taking part to the Programme.

The Data Controller will need to keep the anonymised data until the end of the Programme for statistical purposes.

With regard to the personal data of the entrepreneurs:

- Generally, data of entrepreneurs will only be completely erased if they have never been accepted to participate in the Programme – this will happen 12 months after the last activity in the IT Tool.
- If entrepreneurs were accepted but they have been in status 'Back to Applicant', their data will be made anonymous 12 months after the last log in. If they were never accepted, their data will be erased after the same time period.
- If new entrepreneurs have participated in a relationship, their data will be kept for verification purposes for 10 years and it will then be made anonymous. This delay is due to audit requirements.
- If host entrepreneurs have participated in a relationship and do not want to participate in further relationships, their data will be kept for 10 years and it will then be made anonymous. This delay is due to audit requirements.
- No data will be deleted as long as entrepreneurs are accepted and fully active in the IT Tool; whilst data of withdrawn entrepreneurs (i.e. entrepreneurs who have withdrawn from the IT Tool) will be made anonymous after 6 months.
- Data of new entrepreneurs – who have not yet participated in a relationship – will be made anonymous once they do no longer fulfil the criteria for participation.

With regard to the personal data of the staff of Intermediary Organisations:

- Data pertaining to staff of Intermediary Organisations cannot be deleted until the audit period for the grant agreement of the respective Intermediary Organisation has passed. This period would amount to 12 months (period for reporting and payment of the respective Intermediary Organisation) + 5 years (maximum audit period) – i.e. 6 years after the contract of the Intermediary Organisation has finished. There is no need to make the data anonymous as it is not relevant for statistical purposes.

## **6. How do we protect and safeguard your personal data?**

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission or of its contractor. All processing operations are carried out pursuant to the Commission Decision (EU Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security,

risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

## **7. Who has access to your personal data and to whom is it disclosed?**

Access to the personal data collected through EU Login, the IT Tool or the programme Website is provided to the staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The following persons will have access to your data:

- Staff of Intermediary Organisations in charge of running the Programme;
- Staff of the Support Office;
- Authorised staff of the European Commission and the European Innovation Council and Small and Medium-sized enterprises Executive Agency;
- Entrepreneurs having been accepted to the Programme and thus having access to the IT Tool.

The personal data collected for promotional materials or for publication on the programme social media pages and Website will be public. For this type of publications, you will be asked to express an explicit consent to the sharing and display of your personal data.

### **Cookies**

Cookies are short text files stored on a user’s device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

The cookies employed by the Commission on your device for that purpose will be covered by the cookie policy of the Commission, which is available here: [https://ec.europa.eu/info/cookies\\_en](https://ec.europa.eu/info/cookies_en).

When you visit the Erasmus for Young Entrepreneurs IT Tool, we will keep the browser history of your visit until you quit your browser. This information will then be deleted. The collection, aggregation and anonymising operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission’s websites on EUROPA. More information is available in the Record of Processing DPR-EC-00685 (Europa Analytics).

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission’s control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

### **Third party IT tools, including Social Media**

We use third party IT tools to inform about and promote the Erasmus for Young Entrepreneurs through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

You can watch our videos, which we also upload to our YouTube page and follow links from our website to Facebook, Twitter, Instagram and LinkedIn.

In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users read the relevant privacy policies of [Facebook](#), [Twitter](#), [LinkedIn](#), [Instagram](#), and [YouTube](#) carefully before using them. These explain each company’s policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

### **International transfers**

The data collected through the IT Tool is available to subjects based in countries participating in the programme including outside the European Union (e.g. [non-EU countries participating in the COSME programme](#), with which the European Commission might not have an [adequacy decision](#) or appropriate safeguards). You will thus be asked to express an explicit consent according to Article 50 (1)(a) of Regulation 2018/1725 to the sharing of your personal data with subjects based in countries outside the European Union in your application to the programme.

The personal data collected through the Helpdesk of the Erasmus for Young Entrepreneurs Website will be additionally processed by a processor for the scope of registering and ticketing your enquiries. The processor is based on UK territory, thus the collected data will be transferred on the basis of the Adequacy Decision under Article 47 of Regulation 2018/1725 adopted by [Commission Implementing Decision of 28.6.2021 pursuant to Regulation \(EU\) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom](#). The processor's privacy policy follows the provisions of the General Data Protection Regulation (GDPR) and can be consulted at the following link: <https://help.kayako.com/hc/en-us/articles/360006375320-General-Data-Protection-Regulation-GDPR-and-Kayako>.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further

processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

## **8. What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have consented to provide some of your personal data to the Controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Section 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Section 10 below) in your request.

## **9. Contact information**

### **- The Data Controller and Processors**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact:

- the Data Controller, for any enquiries related to the IT Tool:

*European Commission - DG GROW / Directorate D, Networks and governance / Unit D2, Industrial forum, alliances, clusters*

*E-mail: [GROW-ERASMUS-TEAM@ec.europa.eu](mailto:GROW-ERASMUS-TEAM@ec.europa.eu)*

- the Support Office, for any enquiries related to the Helpdesk feature on the Website:

*Email: [support@erasmus-entrepreneurs.eu](mailto:support@erasmus-entrepreneurs.eu)*

### **- The Data Protection Officer (DPO) of the Commission**

In case of disagreement with the Controller, you may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **- The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

## **10. Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-00591.