



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR INTERNAL MARKET, INDUSTRY, ENTREPRENEURSHIP
AND SMES
COSME Programme
Enterprise Europe Network and Internationalisation of SMEs

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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 H, COSME programme / Unit H2, Enterprise Europe Network and Internationalization of SMEs

Data Processors:

1. Executive agency for Small and Medium Enterprises (EASME)
2. Support Office, contractor in charge of coordinating the Programme
3. Intermediary Organizations (IO) – Commission or EASME 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 European-wide 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 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 and DG GROW and EASME 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 Erasmus for Young Entrepreneurs Website collects, stores and treats users’ information with the scope of examining the usage of the website.
2. 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.
3. 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 contained in:

- 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.

The web service available for the online registration uses cookies to remember your display preferences, such as contrast colour settings or font size. You are offered the possibility to accept or refuse these cookies. If you accept them, cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on EUROPA. Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can deactivate cookies at any time by configuring your web browser. More information on the use of cookies is available at https://ec.europa.eu/info/cookies_en

From the Website:

- IP Address

The web page uses cookies service offered by Google Analytics to improve your website experience, to generate anonymous, aggregate user statistics and to better understand website usage and traffic. You are offered the possibility to accept or refuse these cookies. If you accept them, you can still deactivate the cookies at any time by configuring your web browser.

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 Executive Agency for Small and Medium Enterprises;
- Entrepreneurs having been accepted to the Programme and thus having access to the IT Tool.

The 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 data.

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 H, COSME programme / Unit H2, Enterprise Europe Network and Internationalization of SMEs

E-mail: 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

- 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) 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) 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.