

**Joint Privacy Notice pursuant to article 13 of Regulation EU 2016/679
(hereinafter "GDPR") for applicants of the training program for the UE
Project DataSkills4SMEs ("Project")**

1. Joint Data Controllers and Data Protection Officers (DPO)	<p>Joint Data Controller – Partner 1: European Entrepreneurs CEA-PME-Confederation Europeenne des Associations de Petites et Moyennes Entreprises ("CEA-PME")</p> <ul style="list-style-type: none"> - Address: Avenue de la Renaissance 1, 1000 Bruxelles, Belgium - Telephone: +32 2 7396264 - e-mail: info@cea-pme.com <p>Data Protection Officer (DPO):</p> <ul style="list-style-type: none"> - Address: Avenue de la Renaissance 1, 1000 Bruxelles, Belgium - Telephone: +32 2 7396264 - e-mail: stefan.moritz@cea-pme.com
	<p>Joint Data Controller - Partner 2: Bundesverband Mittelstandische Wirtschaft. Unternehmerverband Deutschlands e.V. ("BVMW")</p> <ul style="list-style-type: none"> - Address: Potsdamer Str. 7, 10785 Berlin - Telephone: +49 30 53320610 - e-mail: info@bvmw.de <p>Data Protection Officer (DPO): Dr. Stephan Gärtner</p> <ul style="list-style-type: none"> - Address Melanchthonstraße 14, 10557 Berlin - Telephone: +49 30 81866371 - e-mail: dsb@stanhope.de
	<p>Joint Data Controller - Partner 3: CONFAPI - Confederazione Italiana della Piccola e Media Industria Privata ("CONFAPI")</p> <ul style="list-style-type: none"> - Address: Via della Colonna Antonina 52, 00186, Rome (Italy) - Telephone: +39 06690151 - e-mail: info@confapi.org - Certified mail (PEC): presidenza@pec-confapi.org <p>Data Protection Officer (DPO):</p> <ul style="list-style-type: none"> - Address: NA - Telephone: +393394040798 - e-mail: dpo@confapi.org - Certified mail address: marcoferrante@ordineavvocatiroma.org
	<p>Joint Data Controller – Partner 4: Österreichischer Gewerbeverein ("OGV")</p> <ul style="list-style-type: none"> - Address: Eschenbachgasse 11, 1010 Wien, Austria - Telephone: + 43 1 587 3 633 0 - e-mail: h.danql@gewerbeverein.at <p>Data Protection Officer (DPO):</p> <ul style="list-style-type: none"> - Address: Eschenbachgasse 11, 1010 Wien, Austria - Telephone: + 43 1 587 3 633 0 - e-mail: c.barfuss@gewerbeverein.at
	<p>Joint Data Controller - Partner 5: Università degli Studi di Roma "Tor Vergata" ("UNITOV")</p> <ul style="list-style-type: none"> - Address: Via Cracovia 50, 00133, Rome (Italy) - Telephone: + 39 06 72598753 - e-mail: rettore@uniroma2.it - Certified mail address: rettore@pec.uniroma2.it <p>Data Protection Officer (DPO):</p> <ul style="list-style-type: none"> - Address: Via Cracovia 50, 00133, Roma (RM) - Telephone: + 39 06 7259 2151

	<ul style="list-style-type: none"> - e-mail: rpd@uniroma2.it - Certified mail address: rpd@pec.torvergata.it <p>Further information about the University's activities related to privacy can be obtained by writing to the following e-mail: privacy@uniroma2.it (Tel. 0672592151).</p>
<p>2. Categories of personal data processed</p>	<p>Joint Controllers are committed to process personal data of applicants of the training program ("data subjects"), namely owners and employees of small or medium enterprises.</p> <p>The learning management system is provided by the Moodle platform.</p> <p>Personal data processed are listed as follows:</p> <ul style="list-style-type: none"> - personal identification information (name and surname); - contact details (e-mail); - work-related information (workplace, role, area); - serial number; - private messaging, log of cycles performed). <p>Joint Controllers undertake not to process special categories of personal data (art. 9, par. 1, GDPR), unless those special categories of personal data emerge unambiguously or may be assumed from the application.</p> <p>Processing of personal data relating to criminal convictions and offences (art. 10, GDPR) is not requested.</p>
<p>3. Source of personal data</p>	<p>Personal data will be obtained by the data subject at the time of the application, pursuant to article 13 of the GDPR.</p> <p>Articles 13 of the GDPR specifies what individuals have the right to be informed about processing operations at the time their data are obtained.</p> <p>When obtaining personal data from other sources (art. 14 of the GDPR), Joint Controllers will not need to provide individuals with the present privacy notice if:</p> <ul style="list-style-type: none"> - the individual already has the information; - providing the information to the individual would be impossible; - providing the information to the individual would involve a disproportionate effort; - providing the information to the individual would render impossible or seriously impair the achievement of the objectives of the processing; - you are required by law to obtain or disclose the personal data; or - you are subject to an obligation of professional secrecy regulated by law that covers the personal data. <p>Per article 14, paragraph 3, of the GDPR, if Joint Controllers obtain personal data from a third party, therefore they must communicate the above information to the data subject either no later than one month after they have obtained the data, at the time they first communicate with the data subject, or before sharing the data with another partner.</p>
<p>4. Purposes of personal data processing</p>	<p>The purposes for which the Joint Controllers will collect and process personal data from data subjects are:</p> <p>4.1) registration on the platform and management of the training program;</p> <p>4.2) sending newsletter about the training program.</p> <p>Retrieving and aggregating personal data for research and analysis about the attendances of the courses will be carried out in anonymized form (<i>considerando</i> 26 and article 89 of the GDPR).</p> <p>Lawful bases of the abovementioned processing are:</p> <ol style="list-style-type: none"> a) for the purpose 4.1, the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract, as defined in art. 6, par. 1, lett. b) of the GDPR; b) for the purpose 4.2), the explicit consent of the data subject, as defined in art. 6, par. 1, lett. a) of the GDPR. <p>Consent is given by checking the registration box and can be withdrawn at any time by the data subject, by writing at the mail address of the Coordinator of the Project – Partner 1 (info@dataskills4smes.eu).</p>
<p>5. Recipients of personal data</p>	<p>For the purposes of this notice, personal data can be disclosed to the single partners and their staff acting in processing personal data, that could include: prospective, current employees; contractors; consultants; workers; officers;</p>

	volunteers; interns; agency workers; apprentices; honorary staff; affiliated academic staff members; and visiting staff members. All of them will be appointed person authorized to process personal data, pursuant to article 29 of the GDPR.
6. Retention period of personal data	Joint Controllers only retain personal data for as long as the legal basis for processing is applicable. Personal data will be stored for 5 years after the end of the project for audit purposes or – limited to purpose 4.2 – until the consent is withdrawn and within the aforementioned 5 years of processing.
7. Rights available to the data subjects	The data subject has the right to: - ask the Coordinator Joint Controller (info@dataskills4smes.eu), pursuant to articles 15, 16, 17, 18, 19, 20 and 21 GDPR, information and access to their personal data and the rectification or erasure of the same or the restriction of the processing that concerns them or to object to their processing, in addition to the right to data portability - withdraw the consent pursuant to article 7 of the GDPR; - lodge a complaint with a supervisory authority (European Data Protection Supervisor, Rue Wiertz/Wiertzstraat 60, B-1047, Bruxelles, Belgium) by writing to the mail address edps@edps.europa.eu , https://edps.europa.eu .
8. Obligation to provide the personal data	Personal data are provided on voluntary basis at the time of the application. Any refusal to provide personal data will preclude the participation in the training project.
9. Data processing methods	Personal data are processed wholly or partly in paper forms and/or by automated means by the partners' Staff, who is authorized to data treatment according to their tasks, in respect of lawfulness, fairness, transparency, accuracy, relevance and necessity as per article 5, paragraph 1 of GDPR. Joint Controllers do not use automated decision-making processing, including profiling.
10. Transfer of personal data to non-EU countries	Within the above mentioned purposes personal data will not be transferred or shared to any non-EU countries or international organization that is non mentioned in the Project.
11. Privacy notice version	The privacy notice is regularly review and, where necessary, updated. If Joint Controllers plan to use personal data for a new purpose, they update the privacy notice and communicate the changes to individuals before starting any new processing. Version of: 23/06/2021