

General Notice on Processing of Personal Data

Version dated January 2019

Agency for Mobility and EU Programmes

Data Protection Officer

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Frankopanska 26, Zagreb

Croatian PIN ("OIB"): 25385906011

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1. Definitions

For the purposes of the General Notice on Processing of Personal Data, the terms stated below will have the following meaning:

Agency	means Agency for Mobility and EU Programmes , Frankopanska 26, Zagreb, Croatian PIN ("OIB): 25385906011;
the Union institutions and bodies	means the Union institutions, bodies, offices, and agencies set up by, or on the basis of, the TEU, the TFEU or the Euratom Treaty;
Data subject	means a person whose personal data is processed, and whose identity identified or identifiable; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
General Regulation	means regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
personal data	means any information relating to a data subject, on the basis of which it is possible to directly or indirectly identify an individual;
Regulation 2018/1725	means Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons regarding the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC;

2. Introduction

- 2.1.** This is the General Notice on Processing of Personal Data issued by the Agency and which contains information on the processing of personal data of the data subjects in cases in which the Agency has the position of a controller of their personal data.
- 2.2.** This General Notice on Processing of Personal Data additionally refers to cases where the Agency is processing personal data of the data subjects in the name of a third party (e.g. the European Commission) – when the Agency acts in accordance with the third party's instructions.
- 2.3.** Due to the specific position of the Agency, the General Regulation or Regulation 2018/1725 could be applicable to the processing of personal data. The Regulation 2018/1725 is applicable to the processing of personal data when the Agency, as a processor of personal data, acts in accordance with the instructions of the Union institutions and bodies. In all other situations, the General Regulation is applicable.
- 2.4.** Due to the wide scope of activities, the Agency may issue additional notices on the processing of personal data for special groups of data subjects. In that case, the specific notices on the processing of personal data contain more precise information for the special groups of data subjects.
- 2.5.** The terms used in this General Notice that have a gendered meaning, regardless of whether they are used in male or female gender form, refer to both the male and the female gender.

3. Agency contact information

- 3.1.** In cases where the Agency has the position of a controller of processing, data may contact the Agency regarding their personal data through the Data Protection Officer whose contact information is listed in the heading of this General Notice.

4. Applicants and participants in the programmes (and their family members)

- 4.1.** The Agency is processing personal data of persons who have applied to a programme in which the Agency is a national organizer or a coordinator (*e.g. CEEPUS, ERASMUS+, Bilateral programme of academic mobility or Horizon 2020*) and/or of persons who are current or previous

participants in some of those programmes. In that respect, the Agency is processing the following personal data categories (*depending on a specific programme, the processing might include only some of the categories listed below*):

4.1.1. Identification data

name, surname, residence address, date and place of birth, citizenship, sex, Croatian PIN number ("OIB"), personal document number, photography;

4.1.2. Contact data

Email address;

Residence address;

Phone number;

4.1.3. Data regarding the programme and grant

Information on the programme to which the person applied, information on the awarded grant or other forms of support, payments, and expenses during the programme, the duration of the programme;

4.1.4. Other data

Data on education and acquired title;

Bank account number;

A doctor's certificate stating that there are no impediments to live at a dormitory and to achieve the mobility (does not state your health data);

Data on any special needs of individuals;

Data on family members (see below).

4.2. The Agency is processing personal data of persons whose family members have applied to the programme in which the Agency is a national organizer or a coordinator (*e.g. CEEPUS, ERASMUS+, Bilateral programme of academic mobility or Horizon 2020*) and/or of persons whose family members are current or previous participants in some of those programmes. In that respect, the Agency is processing the following personal data categories (*depending on a specific programme, the processing might include only some of the categories listed below*):

4.2.1. Identification data

Name, surname, residence address, date and place of birth, citizenship, sex, personal document number, photography;

4.2.2. Other data

Data on a family member who is a participant in a programme.

- 4.3.** The Agency is processing personal data of the data subjects concerned for the following purposes:
- 4.3.1. For the purpose of organizing and coordinating the programmes concerned, for the Agency has a position of a national organizer/a coordinator of the programme (*e.g. for the purpose of evaluating an application, awarding and payment of the grant/supports/other expenses, verifying the proper implementation of the programme, reporting on the success of the programme, for the purposes of arranging the residence and accommodation in the Republic of Croatia*). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/a coordinator of the programme.
 - 4.3.2. For the purpose of informing about future similar programmes and opportunities, based on the previously expressed interest of the data subject. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/a coordinator of the programme;
 - 4.3.3. For the purpose of evaluating the efficiency and success of the programme as well as its organization. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/a coordinator of the programme;
 - 4.3.4. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject;
 - 4.3.5. For the purposes of fulfilment of other legal obligations to which the Agency is subject (*e.g. storing data on payments*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency is subject.

Remark:

The Agency has no influence on all data subjects' personal data which are processed for the needs of the programme to which the data subject applied. In that respect, the Agency acts only as a processor on behalf of and according to the orders of a programme organizer (*e.g. the organizer of the ERASMUS+ programme is the European Commission, the Directorate-General for Education, Youth, Sport and Culture; the European Commission is the organizer of the Horizon 2020 programme*). Regardless, the

Agency may have an impact on the data subjects' personal data and the position of a controller in a part in which the data concerned relate to the organization and management of the programme.

Exceptionally, in the CEEPUS Programme, the Agency is a joint controller with all other CEEPUS national offices in the signatory states of the relevant multilateral agreement. In this regard, data subjects are referred to a separate Privacy Policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>.

5. External programme evaluators and external programme associates

5.1. The Agency is processing the personal data of persons who have applied and/or been selected for the position of an external evaluator or another external associate in the programme in which the Agency has a position of a national organizer or a coordinator. The Agency is processing the following personal data categories:

5.1.1. Identification data

Name, surname, address, date of birth, sex, Croatian PIN number ("OIB");

5.1.2. Contact data

Email address;

Residence address;

Phone number;

5.1.3. Data on professional qualifications and experience

Data listed in the CV;

5.1.4. Position in the programme

Position in the programme (evaluator or similar) and data on the institution or other legal entity as an employer;

5.1.5. Other data

Is the person a VAT subject, bank name and bank account number, data on pension insurance;

Evaluation of the programme, organization and overall cooperation.

5.2. The Agency is processing personal data of the data subjects concerned for the following purposes:

- 5.2.1. For the purpose of fulfilling rights and duties arising from a service contract (*e.g. for the payment of the contract fee*). In this case, the legal basis for the processing of personal data is the contract, i.e., processing is necessary for the entering and performance of a contract;
- 5.2.2. For the purpose of organizing and coordinating the programmes, in which the Agency has a position of a national organizer/a coordinator of the programme while the data subject is acting as an external evaluator or another external associate (*e.g. for the purposes of monitoring the programme, supervising the implementation of the programme*). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/a coordinator of the programme;
- 5.2.3. For the purpose of evaluating the efficiency and success of the programme and its organization. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/coordinator of the programme;
- 5.2.4. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject;
- 5.2.5. For the purpose of fulfilment other legal obligations to which the Agency is subject (*e.g. keeping data on payments*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency is subject.

Remark:

The Agency has no influence on all data subjects' personal data which are processed for the needs of the programme in which data subject is participating as an external evaluator or another external associate. In that respect, the Agency acts only as a processor on behalf of and according to orders of the programme organizer (*e.g. the organizer of the ERASMUS+ programme is the European Commission, the Directorate-General for Education, Youth, Sport and Culture; the European Commission is the organizer of the Horizon 2020 programme*). Regardless, the Agency may have an impact on the data subjects' personal data and the position of a controller in a part in which the data concerned relate to the organization and management of the programme.

Exceptionally, in the CEEPUS Programme, the Agency is a joint controller with all other CEEPUS national offices in the signatory states of the relevant multilateral agreement. In this regard, data subjects are referred to a separate Privacy Policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>.

6. Local partners/contact persons for a specific programme

6.1. In the programmes in which the Agency has a position of a national organizer or a coordinator, the Agency is processing the personal data of local coordinators, local contact persons or persons to which the programme is intended due to their function (*e.g. CEEPUS or Euroguidance*). The Agency is processing the following personal data categories:

6.1.1. Identification data

Name, surname;

6.1.2. Contact data

Email address;

6.1.3. Position in the programme

Data on the institution or other legal entity that the person represents in the programme and the function of the individual;

6.1.4. Other data

Evaluation of the programme, organization and overall cooperation.

6.2. The Agency is processing personal data of the data subjects concerned for the following purposes:

6.2.1. For the purpose of organizing and coordinating the programmes, in which the Agency has a position of a national organizer/coordinator of the programme while data subject is acting as a local coordinator or local contact person (*e.g. for the purposes of contacting by the grant recipients*). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/a coordinator of the programme;

6.2.2. For the purpose of organizing and coordinating the programmes, in which the Agency has a position of a national organizer/a coordinator of the programme while data subject is acting as a person to which the programme is intended due to their function (*e.g. a psychologist at school or a career counsellor at a higher education institution*). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/coordinator of the programme;

6.2.3. For the purpose of evaluating the efficiency and success of the programme and its organization. In this case, the legal basis for the processing of personal data is the

legitimate interest of the Agency as a national organizer/a coordinator of the programme;

6.2.4. For the purpose of informing about future similar programmes and opportunities, based on the previously expressed interest of the data subject. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/coordinator of the programme;

6.2.5. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject;

Remark:

The Agency has no influence on all data subjects' personal data which are processed for the needs of the programme in which data subject is participating as a local coordinator, a local contact person or a person to which the programme is intended due to their function. In that respect, the Agency acts only as a processor on behalf and according to orders of the programme organizer (*e.g. the organizer of the ERASMUS+ programme is the European Commission, the Directorate-General for Education, Youth, Sport and Culture; the European Commission is the organizer of the Horizon 2020 programme*). Regardless, the Agency may have an impact on the data subjects' personal data and the position of a controller in a part in which the data concerned relate to the organization and management of the programme.

Exceptionally, in the CEEPUS Programme, the Agency is a joint controller with all other CEEPUS national offices in the signatory states of the relevant multilateral agreement. In this regard, data subjects are referred to a separate Privacy Policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>.

The Agency publishes personal data of local coordinators and local contact persons on its publicly accessible website so that the programme could function, i.e., so interested parties/users could contact them for the needs of the programme. In this respect, the person concerned is required to provide the Agency only with business contact data which will be published in the above-mentioned way.

For persons to which the programme is intended due to their function (*e.g. a psychologist at school*), there is a possibility that the institution in which that person is employed or the Ministry of Science and Education of the Republic of Croatia (*e.g. for foreign lecturers*) transferred data subject' personal data to the Agency. In that case, the institution or the Ministry was obliged to inform the person concerned of the transfer of the personal data.

7. Business partners

7.1. The Agency is processing personal data of their business partners (*e.g. persons who provide services to the Agency, its suppliers or similar*) as well as persons who have applied for the Agency's public tender calls (*e.g. a public tender for the purchase of certain products or services*). In that respect, the Agency is processing the following personal data categories:

7.1.1. Identification data

Name, surname, Croatian PIN number;

7.1.2. Contact data

Email address, phone number;

7.1.3. Description of cooperation

Services or products delivered to the Agency;

7.1.4. Employer

The legal entity that the individual represents;

7.1.5. Other data

Is the person a VAT subject, bank account number;

7.2. The Agency is processing personal data of the data subjects concerned for the following purposes:

7.2.1. For the purpose of conducting a public tendering procedure and selecting one or more offeror. In this case, the legal basis for the processing of personal data is preparing for entering into a contract, i.e., processing is necessary for entering into a contract;

7.2.2. For the purpose of performance of a contract (*e.g. for issuing invoices or for payment of contracted fees*). In this case, the legal basis for the processing of personal data is the contract, i.e., processing is necessary for the entering and performance of a contract;

7.2.3. For other purposes when the legitimate interest of the Agency exists (*e.g. for partner verification or security measures implementation*);

7.2.4. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject.

Remark:

In the case of legal entities acting as our business partners, the Agency is processing the personal data of persons marked as the contact person of a business partner. In that case, the business partner was required to notify the contact person as their employer of having transferred their personal data to the Agency and for which purpose that personal data were transferred to the Agency.

8. Events participants

8.1. The Agency is processing personal data of persons who have applied and/or participated at some events organized by the Agency (*e.g. info days, conferences or workshops*). The Agency is processing the following personal data categories (*depending on a specific event, the processing might include only some of the categories listed below*):

8.1.1. Identification data

Name, surname;

8.1.2. Contact data

Email address, phone number;

8.1.3. Employer

The legal entity that the individual represents;

8.1.4. Other data

Information on event/s

Satisfaction with the event.

8.2. The Agency is processing personal data of the data subjects concerned for the following purposes:

8.2.1. For the purpose of organizing an event (*e.g. for the needs of planning the number of participants*) as well as evaluation of the participant's content with the event. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as organizer of the event;

8.2.2. For the purpose of promoting the event and the presented topic (*e.g. for the needs of reporting on event success, the announcement of similar new topics*). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as organizer of the event;

- 8.2.3. For the purpose of informing about future similar events, based on the previously expressed interest of the data subject. In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as a national organizer/coordinator of the programme;
- 8.2.4. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject.

Remark:

At events organized by the Agency, there is a possibility of photographing the participants. The photographs are intended for the event promotion. The event promotion is necessary considering the public character of the Agency's activities. The photographs are group photographs, where the focus is not on an individual, but rather on a group of people or the event itself. The goal is not to identify an individual nor will any additional data on participants be published with the photographs.

Considering the public character of the Agency's activities as well as the justified expectations of journalists as professionals whose role is to inform the public, the Agency may process the personal data of the journalist for the above-listed purposes regardless of whether the journalist applied to the event and of whether the journalist previously participated in similar event of the Agency. For these purposes, the Agency processes only those publicly available journalists' personal data, which the Agency regularly verifies to ensure their accuracy.

9. Visitors to the Facebook page of the Agency

- 9.1.** The Agency is processing personal data of Facebook users who have visited or visit the Facebook page of the Agency. In such a case, *Facebook Ireland Ltd* (4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland) and the Agency are in the position of a joint controller of personal data of the data subjects concerned.
- 9.2.** Information on the means of Facebook the personal data processing of the concerned users please find on the following link: www.facebook.com/privacy/explanation.
- 9.3.** The Agency has an influence on the relevant processing only by the means of selecting Facebook user groups (*e.g. by age, gender or similar*) to which the Agency wants to forward a specific

message or content. Information on Facebook users is obtained exclusively by the Agency on a statistical, anonymous basis.

10. Recipients of the Agency's newsletter

10.1. The Agency is processing personal data of persons who signed up for the Agency's newsletter.

10.1.1. Identification data

Name, surname;

10.1.2. Contact data

email address;

10.1.3. Employer

The legal entity that the individual represents;

10.2. The Agency is processing personal data of the data subjects concerned for the following purposes:

10.2.1. For sending the newsletter. In this case, the legal basis for the processing of personal data is the individual's request for the Agency's newsletter, i.e., performance of a contract;

10.2.2. For fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject.

Remark:

The Agency sends newsletters and processes personal data for that purpose not only to the persons who have explicitly requested it, but also to the applicants, evaluators and/or other participants in any Agency programme when it is determined that an individual has previously expressed interest in a specific topic from the newsletter.

11. Job applications

11.1. The Agency is processing personal data of persons who have applied for the advertised work position, an open application for a position, an application for professional/student internship or similar. The Agency is processing the following personal data categories:

11.1.1. Personal data stated in the application, request or similar as well as personal data the Agency collected for the purposes of employment, i.e., the following data:

Personal data stated in the application, request or similar - but never special categories of personal data except for evidence of no criminal record (clearance certificate);

Information on a special status on which an individual can gain an advantage of employment, e.g. the status of a Croatian veteran or family member of Croatian veterans, the status of a member of a national minority or similar;

Evidence of -no criminal record (clearance certificate);

11.1.2. Personal data stated in the application, request or similar as well as personal data the Agency collected for the purposes of student work (entering into a contract for the purposes of student work), i.e., the following personal data:

Personal data stated in the application, request or similar - but never special categories of personal data except for evidence of no criminal record (clearance certificate);

11.2. In the case of entering into an employment contract, the Agency will collect additional data from future employees in accordance with the applicable labour legislation. Processing of these personal data is governed by a separate Employees Privacy Policy.

11.3. The Agency is processing personal data of the data subjects concerned for the following purposes:

11.3.1. For the purpose of selecting and employing new employees, entering into contracts for student work or selecting the interns (*e.g. for selecting candidates for a job interview and for organizing a conversation*). In this case, the legal basis for the processing of personal data is conducting prior actions for the purposes of entering into an employment contract, student work contract or internship contract.

11.3.2. For the purposes of finding new employees and contacting for employment purposes (if an open job application was sent to the Agency). In this case, the legal basis for the processing of personal data is the legitimate interest of the Agency as an employer;

11.3.3. For the purpose of fulfilment of the rights of the data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject.

11.3.4. For the purposes of fulfilment other legal obligations to which the Agency is subject (*e.g. storing data on payments*). In this case, the legal basis for the processing of personal data is compliance with the legal obligations to which the Agency is subject.

12. Access to personal data

12.1. Data subjects' personal data are treated confidentially and are protected by the Agency in accordance with applicable legal regulations and best practices.

12.2. Third persons have a right to access and to process the personal data concerned only in the below-described situations:

Third persons - processors

12.2.1. The Agency allows the access and processing of data subjects' personal data to third service providers that provide services to the Agency for operational business (*e.g. IT services, application evaluation services, advertising, printers, translators, postal and courier services*). The concerned service providers have access only to those categories of personal data that are necessary for the contracted services. In that case, personal data are processed solely in accordance with the instructions of the Agency;

Third persons - controllers

12.2.2. The Agency allows the access and processing of data subject personal data to third service providers whose services the Agency uses to comply with its legal obligation or when it has a legitimate interest (*e.g. tax and legal advisers, when it is necessary to have access to all data in order to give an opinion on specific case*). Such third service providers handle personal data in accordance with their statutory powers and rules of profession. In that case, personal data are processed in accordance with the instructions of the Agency, as well as their statutory powers and rules of profession;

12.2.3. The Agency allows the access and processing of data subject personal data to the competent bodies in the implementation of supervision of the lawfulness of business and conduct. In that case, the competent authorities are processing the personal data in accordance with their statutory authority;

12.2.4. The Agency allows the access and processing of data subject personal data to the third parties with which the Agency is a joint controller (*e.g. within the CEEPUS Programme, the Agency is a joint controller with all other CEEPUS national offices in the signatory states of the relevant multilateral agreement. In this regard, data subjects are referred to*

a separate Privacy policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>).

Situations when the Agency is a processor

12.2.5. When the Agency is processing the personal data in accordance with third party's instructions, that third party is obliged to warn the data subjects about the processing of their personal data and to ensure the lawfulness of processing. When the Agency as an organizer or national coordinator collects and processes the personal data of applicants, evaluators or third parties on a specific programme, the programme manager is also the controller and the person by which instructions the Agency acts.

13. Transfer to third countries

- 13.1.** The Agency transfers personal data to a third country only when the data subjects concerned were previously requested of an explicit consent or when the data recipients and the Agency have a signed contract guaranteeing the same degree of protection, i.e., contains and applies contract provisions approved by the European Commission. Such situations are uncommon, and the Agency avoids them in their everyday business.
- 13.2.** The Agency transfers your personal data to a third country within the CEEPUS Programme. For additional information, data subjects are referred to a separate Privacy Policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>.
- 13.3.** For the purposes of sending programme information and other activities of the Agency, the Agency may use service of the Rocket Science Group LLC d/b/a MailChimp with a registered seat in the United States of America (*more on how they process personal data available through [Privacy policy - MailChimp](#)*). In these cases, the individual's email addresses, to which the relevant information is sent, are stored in the United States of America. The United States, as well as the Rocket Science Group LLC d/ b/a MailChimp, are in the regime approved by the European Commission that is rated as providing a satisfactory level of protection of personal data.

Remark:

In situations when the Agency has the position of a processor and the controller is a third country or a third country institution, the Agency is forwarding the data subject personal data to a controller according to the controller's instructions.

14. Personal data security

14.1. In order to provide adequate personal data protection measures, the Agency undertakes actions that are reasonable and effective, considering the sensitivity of personal data and the risk of unauthorized processing. Some of the measures are the following:

14.1.1. Pseudonymisation of the databases, when possible;

14.1.2. Use of secure personal data exchange methods;

14.1.3. Control of access to the databases;

14.1.4. Supervision of the premises where the databases are stored, i.e., the resources on which they are stored;

14.1.5. Supervision of third parties on which behalf the Agency is processing personal data; and

14.1.6. Confidentiality obligation that binds the employees of the Agency, but also third parties on which behalf the Agency is processing personal data.

15. Data retention period

15.1. Personal data for which the law prescribes data retention period are kept during the statutory prescribed period and are deleted in an additional period of one year.

15.2. In the case of personal data of associates or business partners, if there is no defined statutory data retention period, the Agency keeps them for the entire duration of the contract with the concerned associate or partner. Upon termination of the contract, the Agency deletes personal data of the associate or business partner within an additional period of 6 years from the termination of the contract (statute of limitations period of 5 years, increased by 1 year for deleting).

15.3. In the case of personal data of persons interested in employment or student work at the Agency, which have been submitted in an application for a specific job ad, the Agency keeps them during the selection process and it deletes them upon the termination of the process in period no longer than 6 years (5 years data retention period in accordance with the Croatian Archival Material and Archive Act, increased by 1 year for deleting).

- 15.4.** In the case of personal data of persons interested in employment or student work at the Agency, which have been submitted as an open job application, the Agency keeps them for the maximum period of 12 months.
- 15.5.** Personal data the Agency is processing based on the legitimate interest are kept for the duration of legitimate interest and are deleted within the period of one year after the termination of legitimate interest.
- 15.6.** Personal data the Agency is processing based on data subject's consent are kept for the duration of consent. In the case of a withdrawal, the latter are deleted in the shortest reasonably possible period. If the consent is granted for a specified period, the data are deleted after the expiry of that period in the shortest reasonably possible period.
- 15.7.** For additional information on the data retention period of your personal data within the CEEPUS Programme, data subjects are referred to a separate Privacy Policy available on <https://www.ceepus.info/default.aspx?CMSPage=95#nbb>.

16. Profiling, automated decision-making

- 16.1.** The Agency does not conduct profiling of customers, partners or other persons whose personal data are being processed.
- 16.2.** The Agency does not apply an automatic decision-making system based on the data subjects' personal data, i.e. data subjects' habits or characteristics.

17. Rights of the data subject

- 17.1.** In order to ensure the security of individuals' privacy and their personal data, the Agency is verifying the identity of any person filing a request regarding their personal data in order to reasonably be convinced that the request relates solely to their own personal data.
- 17.2.** Data subjects exercise their rights regarding their personal data processed by the Agency as a controller free of charge. However, if data subject frequently files requests (*e.g. if the previous request was filed less than 6 months ago*) or excessively files requests for access or transfer of personal data (*e.g. providing all data subject's personal data is requested in writing (hard copy)*),

the Agency has the right to ask data subject to bear the Agency's costs in advance before carrying out such actions.

17.3. Data subjects can exercise their below-listed rights by filing a request with the Data Protection Officer of the Agency (*contact information is provided at the beginning of this General Notice*) and entering "*Request of the data subject*" as the subject of the message. Data subjects are obligated to state the nature of the request, i.e., the right data subject wants to exercise and to state their own personal data (*name, last name, Croatian PIN number ("OIB")*) in order to identify data subject.

17.4. *Access to personal data:*

Data subjects have the right to ask for a confirmation that the Agency is processing their personal data, as well as access to their processed personal data.

17.5. *Rectification of inaccurate personal data:*

Data subjects have the right to request the rectification of their incorrect personal data that the Agency is processing as a controller, as well as the right to complete their personal data.

17.6. *Data portability*

Data subjects have the right to receive and request the transfer of their personal data that the Agency is processing as a controller.

17.7. *An objection about the processing or handling personal data:*

Data subjects have the right to object to the processing of their personal data that the Agency is processing as a controller, as well as the Agency's general manner of handling their personal data.

17.8. *The right to withdraw consent*

At any time, data subjects have the right to withdraw the consent for further processing of personal data given to the Agency. The withdrawal of consent does not affect the processing based on consent before its withdrawal.

17.9. *The right to complain to the Croatian Personal Data Protection Agency:*

At any time, data subjects have the right to complain to the competent body for the protection of personal data – Croatian Personal Data Protection Agency (*Agencija za zaštitu osobnih podataka*) (www.azop.hr), in relation to the processing and protection of their personal data.

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