PRIVACY POLICY DISCLAIMER

EDUC ALLIANCE – Website

BASIC LEGAL INFORMATION - NEWSLETTER

Data Controller	EDUC Alliance (www.educalliance.eu)
Purposes	Subscribe to the EDUC Alliance Newsletter
Lawfulness	Consent
Data Right	Access, Rectification, Erasure, Restriction,
	Objection and withdraw consent.
Additional Information	https://www.educalliance.eu/privacy-policy

BASIC LEGAL INFORMATION – EVENTS

Data Controller	EDUC Alliance (www.educalliance.eu)
Purposes	Subscribe to the EDUC Alliance Events
Lawfulness	Consent
Data Right	Access, Rectification, Erasure, Restriction,
	Objection and withdraw consent.
Additional Information	https://www.educalliance.eu/privacy-policy

ADDITIONAL LEGAL INFORMATION

1. Who processes your personal data?

- 1. EDUC-Alliance and that it is composed of several European Universities as data controllers.
- 2. On the EDUC Website we create an exclusive page to indicate the identity, contact and DPO details of each University.
- 3. We invite users to visit the identity section of the different members of the EDUC Alliance.
- 4. According to GDPR Art. 26 (2), all the controller concluded a contract regulating their joint controllership. A copy of this agreement can be found at https://www.educalliance.eu/resources

2. What personal data do we collect?

- 1. By subscribing to EDUC news, events and special announcements, the following personal data will be processed:
 - a. Your email address
 - b. First name
 - c. Country
 - d. Your Institution
- 2. When you browse the EDUC Website, we collect the following data:
 - a. Log data, e.g. IP-addresses and at what time you access which parts of the website
 - b. Technical cookies necessary for the operation of the website
 - c. Other information collected through cookies you have accepted (visit our Cookie Policy for more information)

3. Where do we collect your personal data?

Currently, the entire EDUC Alliance Website infrastructure is hosted and managed by the University of Pécs, but in the future the Controllers have agreed to move the entire EDUC Alliance Website infrastructure and administration to the Universitat Jaume I. So, the specific provisions on Data Processing are:

For as long as the infrastructure is hosted and managed by the University of Pécs:

- (1) **«Administrator Controller»:** The Controller 5 (University of Pécs) will be responsible for the processing of personal data processed for purposes 1 and 2.
- (2) **«Processor Controller».** They Controllers 1, 2, 3, 4, 5, 6, and 8 will be responsible for the processing of personal data processed for purposes 1 and 2.

For as long as the infrastructure is hosted and managed by the University Jaume I:

- (1) **«Administrator Controller»:** The Controller 1 (University Jaume I) will be responsible for the processing of personal data processed for purposes 1 and 2.
- (2) **«Processor Controller».** They Controllers 2, 3, 4, 5, 6, 7 and 8 will be responsible for the processing of personal data processed for purposes 1 and 2.

More information about this "Administrator Controller" is provided below in point 9.

4. How long will we retain your personal data?

The newsletter subscription data is stored until the data subject withdraws his/her consent or communicates his/her refusal to continue receiving the newsletter.

Event subscription data is stored until the end of the event to which the data subject subscribed and for as long as there are legal liabilities attributable to the EDUC Alliance or any of its partners.

COOKIE LIST AND SPECIFICATIONS

Cookie Name	Purpose	Temporality
educ-refresh-token	Request a new access token (x-auth token)	60 days
x-auth-token	Request a new access token (x-auth token)	15 minutes
XSRF-TOKEN	CSRF token to protect against attacks	It lives until the browsing process
JPTESESSION	User identification for Openup modules	1 week

For more information, please visit our Cookie Policy

5. What purposes do we process your personal data for?

The "EDUC Alliance Website" under the URL https://educalliance.eu is established in order to promote and give visibility to the activities carried out by the EDUC European University Alliance.

6. Why do we process your personal data?

Lawfulness of processing:

- (1) **Newsletter.** Subscription to the Newsletter via the EDUC Website is based on the explicit consent of the data subject. In accordance with Art. 6 para. 1 sentence 1 lit. a GDPR. The consent is given conclusively by providing the data.
- (2) **Events.** Subscription to events offered through the EDUC Website is based on the explicit consent of the data subject. In accordance with Art. 6 para. 1 sentence 1 lit. a GDPR. The consent is given conclusively by providing the data. Likewise, during the subscription process, the data subject will be informed by the event organiser of his or her identity and of the

specific data processing carried out at the event for which he or she is applying for subscription, requesting his or her consent in a conclusive manner.

- (3) **Cookies.** The processing of personal log data and personal data in connection with the storage of session cookies on your device is carried out on the basis of the aforementioned provisions.
 - (a) For as long as the infrastructure is hosted and managed by the University of Pécs, the storage of session cookies on the personal device itself is based on based on Act CXII of 2011 on Informational Self Determination and the Freedom of Information (hereinafter: Privacy Act), and Act CVIII of 2001 on certain issues of electronic commerce activities and information society services.
 - (b) For as long as the infrastructure is hosted and managed by the University Jaume I, the storage of session cookies on the personal device itself is based on Article 22 (2), Spanish Law 34/2002, July 11, on information society services and electronic commerce (LSSICE).

7. To which third parties will we disclose your personal data?

For as long as the infrastructure is hosted and managed by the University of Pécs, we will disclose your personal data to the following third parties:

- RackForest Zrt.
- FERLING Kft.
- MailerLite

For as long as the infrastructure is hosted and managed by the University Jaume I, all IT infrastructure is hosted in AWS (Amazon Web Services EMEA SARL – Ireland) and managed by Rackspace (Rackspace International GmbH with registered office in Zurich, Switzerland). In rare cases if there is a data transfer to the USA, SCCs (Standard Contractual Clauses) will be in act as well as the Data Privacy Framework for EU-US personal data transfers.

8. What security measures have we implemented?

For as long as the infrastructure is hosted and managed by the University of Pécs, the safety measures include, at least:

The Alliance shall ensure adequate security of the personal data of the data subject, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, by implementing appropriate technical and organisational measures. Further information about the data security measures applied by the Alliance can be found in §§ 20-22 of the University of Pécs <u>Data Protection Regulations</u> and in Chapter IV of the <u>IT Regulations</u>.

For as long as the infrastructure is hosted and managed by the University Jaume I, the safety measures are:

- (1) The security measures established in the Spanish National Security Framework (ENS), at medium level, and specified in Annex 2 of Royal Decree 311/2022, of May 3, which regulates the National Security Framework
- (2) To view this, please visit the following link:

 https://administracionelectronica.gob.es/dam/jcr:eb23ff83-ebdb-487e-abd2-8654f837794f/RD 311-2022 of-3 May ENS.pdf

9. What are your rights?

According to GDPR, Articles 15-21, You can exercise your rights of access, to rectification, -portability and erasure of your data and those of restriction, objection to their processing and withhold consent. The point of contact for exercising rights as data subjects resulting from Art. 15 to 21 GDPR is, for general technical data, the Administrator Controller running each platform or Data Controllers of the respective university of affiliation of the teacher(s) for those courses or modules taught. Related to this is the obligation to make available to data subjects upon request the information pursuant to Art. 15 GDPR and to handle processing requests pursuant to Art. 16 to 21 GDPR. All Processors Controller shall cooperate, if necessary, to facilitate the exercise of rights. Being so, the contact information for exercising your rights is listed below:

Current Administrator Controller:

University of Pécs

Vasvári P. u. 4.

7622 Pécs - Hungary

Email: adatvedelem@pte.hu

Rest of Processor's Controllers:

University Jaume I

Edifici Rectorat i Serveis Centrals. Campus de Riu Sec. E

Castelló de la Plana (Castelló) - Spain

Email: dpd@uji.es

University of Cagliari

via Università, 40

09124 Cagliari - Italy

Email: dpo@unica.it

Masaryk University

Žerotínovo nám. 617/9

60177 Brno - Czech Republic

Email: poverenec@muni.cz

University Paris Nanterre

Direction des Affaires Juridiques et Institutionnelles (DAJI)

Batiment Pierre Grappin

200 avenue de la République

92001 Nanterre Cedex - France

Email: dpo@liste.parisnanterre.fr

University of Rennes

Monsieur le Président de l'Université de Rennes A l'attention de la déléguée à la protection des données Direction des Affaires Juridiques et Institutionnelles (DAJI) Batiment 1A
263 av Général Leclerc
35042 RENNES CEDEX
CS 74205 - France

Email: dpo@univ-rennes.fr

University of South-Eastern Norway

Postboks 43199 Borre

Norway - Email: Postmottak@usn.no

University of Postdam:

Am Neuen Palais 10 14469 Potsdam - Germany

Email: datenschutz@uni-potsdam.de

The contact details of the Data Protection Officer of each University are as follows:

- University Jaume I: dpd@uji.es
- University of Cagliari: dpo@unica.it
- Masaryk University: <u>poverenec@muni.cz</u>
- University Paris Nanterre: dpo@liste.parisnanterre.fr
- University of Pécs: adatvedelem@pte.hu
- University of Rennes: dpo@univ-rennes.fr
- University of South-Eastern Norway: postmottak@usn.no
- University of Postdam: <u>danteschutz@uni-postdam.de</u>