

PERSONAL DATA PROCESSING POLICY

Asociatia COSI respects the privacy of participants in events/activities/projects, as well as candidates in Erasmus+ and European Solidarity Corps projects, and we are committed to protecting your personal data. To this end, we adopt this Personal Data Processing Policy to align with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as "GDPR"), applicable in all European Union member states.

In the following lines, we will inform you about how we manage personal data and your privacy rights. We invite you to read this privacy statement carefully.

Who Are We?

The data controller is **Asociatia COSI** (Civic Orientation and Social Integration), a Romanian legal entity, CIF RO33155095, registration number 16509/A/2014, with its registered office at Intrarea Ana Ipatescu No. 6A, Dobroesti 077085, Ilfov County, and working point at Splaiul Unirii No. 6, Block B3A, Staircase 1, Floor 1, Ap. 01, Sector 4, Bucharest. If you have any questions or requests regarding the processing of personal data, you can contact us by sending an email to asociatiacosi@gmail.com or by phone at 0763 795 403.

How Do We Collect Personal Data?

Directly: We obtain personal data from individuals in various ways, including by filling out online forms, registration forms, or participation in courses, mobilities, and seminars organized by COSI, as well as by collecting documents necessary for participating in the selection process of mobility projects (CVs, application forms and motivation letters), travel and reimbursement documents, and photographs and audio-video recordings made during our activities.

What Categories of Personal Data Do We Collect?

The personal data we consider are:

- **Contact information** such as name and surname, mobile phone number, email address, postal address. In some cases, we collect the name of the company/organization/institution you work for, job title, professional/educational experience, and any other information you provide.
- **Additional information** processed obligatorily for concluding or exercising a contractual relationship or voluntarily communicated by you, such as given instructions, payments made, requests, and projects;
- **Travel and reimbursement data** such as travel documents, tickets, boarding passes, invoices and receipts, and the bank details of your sending organisation;
- **Images and recordings** such as photographs and audio-video material taken during the activities we organize;
- **Information about special needs** such as dietary requirements, allergies, accessibility needs or medical conditions, only where you choose to communicate them to us so that we can make the necessary arrangements during an activity;
- **Other personal data** necessary to inform you if relevant to our activity, which falls within the legitimate interest of the operator;

Why Do We Need Personal Data and on What Legal Basis?

We process personal data transparently for the following purposes:

- **Organisation and implementation of courses, projects, seminars and mobility activities, including the selection of participants** - performance of a contract or steps taken at your request prior to entering into a contract, Article 6(1)(b) GDPR;
- **Management and reporting of the grant to the National Agency and the European Commission** - performance of a contract and compliance with a legal obligation, Article 6(1)(b) and (c) GDPR;
- **Compliance with our legal obligations** such as record-keeping obligations, the issuance of financial-accounting documents, the conclusion of contracts and other necessary acts in our activity, and responding to checks, controls, audits and investigations - Article 6(1)(c) GDPR;
- **Publication of photographs and audio-video material** for the promotion, dissemination and visibility of the project - your consent, Article 6(1)(a) GDPR, which you may withdraw at any time;
- **Informing you about our activity** where relevant to you - our legitimate interest, Article 6(1)(f) GDPR.

Where you provide us with information about your health, dietary requirements or accessibility needs so that we can make reasonable arrangements during an activity, we process that information only on the basis of your explicit consent, Article 9(2)(a) GDPR, and only for as long as the activity requires.

Do We Share Personal Data with Third Parties?

We communicate personal data to third parties for organizing the courses we provide, but these third parties have similar obligations to COSI concerning data protection. We share personal data with:

- **ANPCDEFP** (National Agency for Community Programs in the Field of Education and Vocational Training);
- **the European Commission**, through the Erasmus+ and European Solidarity Corps platform;
- **partner and sending organisations** participating in the project;
- **service providers** strictly as needed for the activity, such as accommodation, transport and insurance providers;
- **public authorities**, where we are required to do so by law.

Personal data transferred to the National Agency and to the European Commission are processed under the privacy statement published at <https://ec.europa.eu/erasmus-esc-personal-data>.

Transfers Outside the European Union

Some of the partner and sending organisations taking part in our projects are established outside the European Union and the European Economic Area, for example in Albania, Armenia, Azerbaijan, Bosnia and Herzegovina, Georgia, Kosovo, Moldova, Montenegro, North Macedonia, Serbia, Turkiye and Ukraine.

Where we transfer your personal data to such an organisation, we do so only for the purposes described above and only on the basis of one of the safeguards provided in Chapter V of the GDPR, in particular the standard contractual clauses adopted by the European Commission, or, in the absence of such safeguards, on the basis of your explicit consent given after you have been informed of the possible risks, in accordance with Article 49(1)(a) GDPR. You may ask us at any time for information on the safeguards in place.

What Are the Rights of Data Subjects?

As a data subject, you have the following rights:

- **Right of access** (Article 15 GDPR): to request a copy of the personal data held by COSI, to know if we process data about you, and to know what data, to whom they are transferred, how long they will be kept, and where we obtained them.
- **Right to rectification** (Article 16 GDPR): to obtain the correction of inaccurate personal data and the completion of incomplete personal data.
- **Right to erasure** (Article 17 GDPR): to request that personal data be deleted.

- **Right to restriction of processing** (Article 18 GDPR), including in the event of a dispute regarding the accuracy of the personal data processed.
- **Right to data portability** (Article 20 GDPR), which applies if we process your personal data by automated means based on consent or contract.
- **Right to object** (Article 21 GDPR): to object at any time, on grounds relating to your particular situation, to processing based on our legitimate interest, and at any time to processing for direct marketing purposes.
- **Right to withdraw your consent** (Article 7(3) GDPR), when processing is based on consent, without affecting the legality of processing activities carried out up to that point.
- **Right not to be subject to a decision based solely on automated processing**, including profiling (Article 22 GDPR). We do not carry out such processing.
- **Right to be informed** as clearly as possible about your data rights (Articles 13 and 14 GDPR).
- **Right to lodge a complaint with the supervisory authority**: National Authority for the Supervision of Personal Data Processing, at B-dul G-ral. Gheorghe Magheru, No. 28-30, Bucharest, Romania, or by email at anspdcp@dataprotection.ro.

You can exercise these rights by writing to us at asociatiacosi@gmail.com. We will reply within one month of receiving your request. That period may be extended by two further months where the request is complex or where we receive a number of requests, in which case we will inform you within one month, in accordance with Article 12(3) GDPR.

Keeping Personal Data Secure

We ensure that access to personal data is limited and authorized only to persons legally entitled to use it. These individuals are obliged to ensure data confidentiality.

How Long Will We Keep Personal Data?

We will store the personal data necessary for providing services per the activity object, to maintain contact with data subjects, and to comply with legal obligations. We will store your data only for the time needed to achieve the purposes outlined above, while respecting current legal requirements, or until you withdraw your consent. We estimate that the processing activities detailed above will require storing personal data for the following periods:

- **Data included in the contract and financial documents**: 5 years, starting from the end of the financial year during which they were prepared.
- **Project records, including participant data and travel and reimbursement documents**: 5 years from the final payment of the grant by the National Agency, in accordance with the record-keeping obligations of the Erasmus+ grant contract.
- **Photographs and audio-video material published on the basis of your consent**: until you withdraw your consent.
- **Other data**: throughout the contractual period and 5 years after the contract ends.

Once the processing period indicated above expires, and COSI no longer has legal or legitimate reasons to process your personal data, the data will be deleted in accordance with its procedures, which may involve archiving, anonymizing, or destroying them.