

PRIVACY POLICY – STAFFMOBILITY.EU

This Privacy Policy (hereinafter referred to as the "**Privacy Policy**") governs the processing of your personal data by the website <http://www.staffmobility.eu> (hereinafter referred to as the "**Website**"), and your communications with us through this Website, including via social networks (hereinafter "**Social Networks**", e. g. Facebook, LinkedIn, and Instagram) which are functionally integrated on the Website.

1 GENERAL INFORMATION

- 1.1 *Your personal data are processed by UNICA a.i.s.b.l. - Network of Universities from Capitals of Europe - c/o University Foundation - Rue d'Egmont 11 - 1000 Brussels, Belgium (hereinafter "UNICA", "we", "us", "our", "our"), acting as a data controller as defined under applicable data protection law.*
- 1.2 *You can contact us by e-mail at the following address: office@unica-network.eu.*
- 1.3 *The personal data that we process in relation to you varies depending on your usage profile, and notably whether you are a general visitor of the website (without a user account), an event participant, an event organiser, or an expert. For the purposes of this policy, 'events' include Staff weeks, Job-shadowing, or any other types of events described on the Website. In the sections below, we will provide relevant information tailored to your profile.*

2 YOU ARE A VISITOR OF OUR WEBSITE WITHOUT A USER ACCOUNT

2.1 **The type of personal data we process**

2.1.1 Each time you use our Website we automatically collect:

- technical information related to the device you are using, such as your IP address, browser type, geographical location and operating system;
- information about your browsing behaviour, such as the length of your visit, the links you click on, the pages you visit and how often you visit a page.

2.1.2 When you complete a contact form on our Website or contact us by e-mail, telephone, fax, in particular when you contact us to create a user account on our Website, we collect:

- the basic identity information you provide us, such as name, e-mail address, postal address, telephone number, company you work for, your position;
- the content of your communications, and the technical information of your communications themselves (the person with whom we communicate on our side, the date and time, etc.);
- your preferences regarding the receipt of our e-mail communications, such as newsletters, etc., if you have chosen to receive these communications;
- your profile information on Social Networks made available to the public;
- any other personal data you choose to provide to us when you fill the section "short biography" and when you upload you CV.

2.1.3 We may receive additional information about your preferences and browsing behaviour from partners such as Google and LinkedIn. If you require more information about the personal data about you that these parties process and make available to third parties, we invite you to consult their respective privacy policies:

- Google: <https://policies.google.com/privacy?hl=en> ;
- LinkedIn: https://www.linkedin.com/legal/privacy-policy?_l=en

2.2 Purpose of the processing operation

2.2.1 UNICA processes your personal data in order to provide you with the information and services you request on the Website, by e-mail, telephone, fax; and to ensure the correct, safe and efficient functioning of the Website.

2.2.2 UNICA processes your personal data in order to create a user account on our website if you request that we do so, or to respond to any other requests that you make.

2.2.3 UNICA processes your personal data in order to comply with legal obligations or to comply with any reasonable request from relevant officials or representatives of the police, judicial authorities, government agencies or governmental bodies, including relevant data protection authorities.

2.2.4 Your personal data may be transferred at UNICA's initiative to the police or judicial authorities as evidence or in the event of reasonable suspicion of an illegal act or offence on your part when you register or use the Website or other means of communication with us.

2.2.5 UNICA can processes your personal data to carry out statistical analyses in order to improve our Website and services or develop new services.

2.2.6 UNICA may process your personal data in order to protect its legitimate interests and those of its partners or a third party in the event that and when your registration or use of the Website, or other means of communication can be considered as (a) a violation of any of the applicable terms of use or intellectual property rights or any other right of a third party, (b) a threat to the security or integrity of the Website, or other means of communication, (c) a danger to the Website, or other means of communication or to any of the underlying systems of UNICA or its subcontractors due to viruses, Trojans, spyware, malware or any other form of malicious code, or (d) hateful, obscene, discriminatory, racist, defamatory, contemptuous, offensive or in any other inappropriate or illegal manner.

2.3 The legal basis for the processing of your personal data

2.3.1 In order to be able to process your personal data for the purposes indicated in clauses 2.2.1 and 2.2.2, UNICA, as a responsible party, requires your consent.

2.3.2 The processing of your personal data necessary for the fulfilment of the purposes set out in clauses 2.2.3 and 2.2.4 is necessary to enable UNICA to comply with its legal obligations.

2.3.3 The processing of your personal data necessary for the purposes set out in clauses 2.2.5 and 2.2.6 is necessary to protect UNICA's legitimate interests, which are:

- the continuous improvement of UNICA's Website and services to ensure that you get the best possible experience;
- the protection of our Website and services against any misuse and illegal activity.

3 YOU ARE AN EVENT PARTICIPANT

3.1 *The type of personal data we process*

3.1.1 In addition to any personal data that we process due to your actions as a simple visitor (as described in section 2 above), if you have a user account that you use to participate in events we additionally collect information about the events that you choose to register for.

3.2 *Purpose of the processing operation*

3.2.1 In addition to the purposes of processing due to your actions as a simple visitor (as described in section 2 above) which will also apply to the personal data described in section 3.1.1, if you have a user account that you use to participate in events UNICA also processes your personal data in order to enable your registration for events, including by passing it onwards to the event organisers if technically necessary to allow you to register.

3.3 *The legal basis for the processing of your personal data*

3.3.1 In order to be able to process your personal data for the purposes indicated in clause 3.2.1, UNICA relies on your consent, as expressed explicitly through your choice to register for an event.

4 YOU ARE AN EVENT ORGANISER

4.1 *The type of personal data we process*

4.1.1 In addition to any personal data that we process due to your actions as a simple visitor (as described in section 2 above), if you have a user account that you use to organise events, we additionally collect information about the events that you choose to organise.

4.2 *Purpose of the processing operation*

4.2.1 In addition to the purposes of processing due to your actions as a simple visitor (as described in section 2 above) which will also apply to the personal data described in section 4.1.1, if you have a user account that you use to organise events, UNICA also processes your personal data in order to enable your creation and management of events on the Website, including by passing it onwards to potential event participants or to other visitors of the Website, or by making it publicly available through other publicly accessible resources, in order to promote awareness of your event and encourage participation.

4.3 The legal basis for the processing of your personal data

4.3.1 In order to be able to process your personal data for the purposes indicated in clause 4.2.1, UNICA relies on your consent, as expressed explicitly through your choice to publish information relating to an event.

5 YOU ARE AN EXPERT

5.1 The type of personal data we process

5.1.1 In addition to any personal data that we process due to your actions as a simple visitor (as described in section 2 above), if you have a user account that you use in your capacity as an expert, we additionally collect information about your role and claimed qualifications and competences as an expert as made available to us by you, and any evidentiary information that you choose to provide to us, along with your indicated availabilities and interests for cooperation.

5.2 Purpose of the processing operation

5.2.1 In addition to the purposes of processing due to your actions as a simple visitor (as described in section 2 above) which will also apply to the personal data described in section 5.1.1, if you have a user account that you use in your role as an expert, UNICA also processes your personal data in order to enable you to link to any users of the Website that are interested in your expertise, including for the purposes of establishing new cooperation opportunities.

5.3 The legal basis for the processing of your personal data

5.3.1 In order to be able to process your personal data for the purposes indicated in clause 5.2.1, UNICA relies on your consent, as expressed explicitly through your choice to publish information relating to your status as an expert.

6 WE USE COOKIES

6.1 *We use cookies to enable the functioning of this website. Cookies are small text files which are placed on your computer when you visit this website. Cookies help us to do different things, such enabling certain features on our website or measure how visitors such as you use our website.*

6.2 *We use different categories of cookies, including notably:*

Cookie Provider	Cookie Name	Cookie function	Cookie lifespan
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Doubleclick.net (this is a server used by Google)	IDE, cto_lwid	These cookies are used by Google to collect information for use on Google Adwords. The data is anonymous and helps Google deliver relevant advertising on other websites.	The cookies expire between three and thirteen months.
Staffmobility.eu	__utma, __utmb, __utmc, __utmt, __utmz, has_js	Those of the google analytics cookies we use in order to monitor the use and frequentation of our website and check whether the used has java scrip embeded	The lifespan varies, from the session to 2 years.
Youtube.com:	CONSENT, GPS, PREF, VISITOR_INFO1_LIVE, YSC, and remote_sid	We have embedded YouTube video on our website. Those cookies are used to monitor your habits and preference, as well as the version of he interface used and the number of viewed of the video.	The lifespan varies, from 30 min to persistent

6.3 We need you consent to be able use these cookies. You can give your consent by clicking the appropriate button in the cookie banner used by this Website.

You can withdraw your consent at any time by deleting the cookies stored in your browser. You can find more information on how to do this on the websites of the respective browser manufacturers:

- Internet Explorer: <https://support.microsoft.com/en-gb/help/17442/windows-internet-explorer-delete-manage-cookies>;
- Safari: <https://support.apple.com/en-gb/guide/safari/manage-cookies-and-website-data-sfri11471/mac>;
- Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>;
- Chrome: <https://support.google.com/chrome/answer/95647?hl=en>;
- Microsoft Edge: <http://windows.microsoft.com/en-gb/windows-10/edge-privacy-faq>.

7 RECIPIENTS

7.1 UNICA does not send your personal data in an identifiable manner to any third party without your explicit permission except as described in this privacy policy. Note that other users of the Website may receive access to personal data that you choose to publish or share via this Website, and that this privacy policy only allows such users to use your personal data for the purposes set out herein. When you receive personal data of other users of the Website as a part of the functions of the Website, you are only permitted to use that data as described in this privacy policy. Any other use is at your sole responsibility and liability.

7.2 Furthermore, UNICA uses third party subcontractors to provide you with the services of the Website and process your personal data on our behalf. These third party subcontractors are only allowed to process your personal data on behalf of UNICA on UNICA's explicit written instructions. UNICA guarantees that all third party subcontractors are carefully selected and are required to respect the security and integrity of your personal data, and ensures that their use of your personal data complies with this privacy policy.

8 LOCATION AND TRANSFER

- 8.1 UNICA processes your personal data within the EU. Note however that the functionality of the Website can entail the public availability of your personal data to a potentially global audience, if you choose to publish your personal data or make it otherwise publicly available via the Website.
- 8.2 UNICA may transfer pseudonymised, anonymised and/or aggregated data to organisations outside the EU. In this case, UNICA will ensure that protective measures are in place to ensure the security and integrity of your data and all rights relating to personal data that you may have under applicable mandatory legislation.

9 PROPORTIONALITY AND QUALITY ASSURANCE

- 9.1 UNICA shall process only those personal data which are necessary for the purposes listed herein.
- 9.2 Your personal data will only be processed for the time necessary to achieve the purposes listed in this Privacy Policy, or until you actively withdraw your consent to their processing by requesting the deletion of your personal data. UNICA will depersonalise your personal data when they are no longer necessary for the purposes set out herein, unless there is:
- a primary interest for UNICA or any other third party to keep your personally identifiable data;
 - a legal or regulatory obligation or a judicial or administrative order preventing UNICA from depersonalizing them.
- 9.3 UNICA will take appropriate technical and organisational measures in accordance with the state of the art to protect your personal data against unauthorised access or theft and against accidental loss, alteration or destruction. Only UNICA staff or its third party processors who need to know your personal data will have access to it and will be subject to strict confidentiality obligations. However, please understand that safety and security measures will be in line with the state of the art for similar websites, but that they are best efforts obligations that can never be guaranteed. You should not rely on the Website as a permanent archive or to support critical functions.

10 YOUR RIGHTS

- 10.1 You have the right to request access to all personal data processed by UNICA concerning you. UNICA may charge administrative fees for subsequent access requests that are clearly submitted in order to harm or prejudice UNICA.

10.2 You have the right to request the rectification, free of charge, of any personal data concerning you that are inaccurate.

10.3 You have the right to request the deletion of personal data concerning you if they are no longer necessary for the purposes set out above or if you withdraw your consent to their processing. However, you should keep in mind that UNICA will assess your deletion request against:

- the overriding interests of UNICA or any other third party;
- any legal or regulatory obligations or judicial or administrative orders that may conflict with such deletion.

Instead of requesting the deletion of your personal data, you may also request that UNICA limit their processing if and when (a) you dispute the accuracy of the data, (b) the processing is unlawful or (c) the data are no longer necessary for the purposes listed herein, but you need them to defend yourself in legal proceedings.

10.4 You have the right to object to the processing of personal data if you can prove that there are serious and well-founded reasons linked to particular circumstances guaranteeing such opposition. However, if the processing operation envisaged is a direct marketing operation, you have the right to object to such processing free of charge and without justification.

10.5 You have the right to withdraw your earlier consent to the processing of your personal data, in which case Clause 9.2 will apply.

10.6 If you wish to submit a request to exercise one or more of the rights listed above, you may send an e-mail to office@unica-network.eu. This request must clearly indicate which right you wish to exercise and the reasons for the request, if required. It must also be dated, signed and completed by a scanned copy of a valid identity card or equivalent proof of your identity. UNICA shall have the right to demand specific proof in case of reasonable doubts in relation to your request, or when your request may prejudice the rights of third parties, including other users of the Website.

UNICA will inform you promptly of the receipt of this request. If the request is valid, UNICA will honour it as soon as reasonably possible and no later than thirty (30) days after receiving the request.

If you have any complaints about UNICA's processing of your personal data, you can always contact UNICA at the e-mail address indicated in the first paragraph of this clause. If you are not satisfied with UNICA's response, you are free to lodge a complaint with the competent data protection authority, namely the Belgian Data Protection Authority (<https://www.dataprotectionauthority.be/>)