ACCADEMIA EUROPEA DI FIRENZE

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PRIVACY NOTICE REGARDING THE PROCESSING OF PERSONAL DATA

Participants in Erasmus+ VET international mobility projects (Learners & Staff)

(Pursuant to Art. 13 of EU Regulation 2016/679 - GDPR)

Dear Participant (student/staff member), **Accademia Europea di Firenze ETS**, acting as the Data Controller, wishes to inform you that, in relation to your application and/or participation in Erasmus+ VET international mobility activities, it is required to collect and process personal data relating to you. Processing will take place in compliance with the principles of fairness, lawfulness, transparency, and the protection of your confidentiality and rights.

1. Nature of the processed data

Our Association will process the following data:

- **Common Data:** Personal identification data (name, surname, date of birth), contact details (email, telephone), tax code, bank details (for the disbursement of the accommodation security deposit), data relating to academic/professional background, curriculum vitae.
- **Special Categories of Data (formerly Sensitive):** Pursuant to Art. 9 of the GDPR, we may need to process data relating to **health status** (e.g., allergies, food intolerances for accommodation organization, disabilities or medical conditions for requesting special funds for fewer opportunities or for managing insurance and security coverage).

2. Purpose and Legal Basis for Processing

The personal data you provide will be processed for the following purposes:

1. **Administrative management and selection:** Evaluation of the application and management of security procedures.
2. **Logistics organization (Incoming/Outgoing):** Organization of travel, accommodation services, optional pre-departure linguistic/cultural training, and matching with host companies.
3. **Institutional reporting obligations:** Communication and entry of data to the Sending Partner to manage official platforms of the European Commission (e.g., *Beneficiary Module*) and monitoring by the National Agency.
4. **Dissemination and Promotion:** Subject to your specific consent, use of images or short videos created during the experience for dissemination purposes and reporting on results (e.g., social networks, the organization's website, channels in synergy with Europe Direct and Informagiovani).

The processing is necessary for the execution of the mobility contract to which you are a party (Art. 6(1)(b) GDPR) and to fulfill legal and European regulatory obligations connected to the Erasmus+ Accreditation (Art. 6(1)(c) GDPR). For health/special data or the use of images, the legal basis is your explicit consent.

3. Methods of processing

Data processing will be carried out using tools and procedures suitable for ensuring security and confidentiality. It may be performed both using paper-based supports and through the aid of **IT means and remote communication platforms** (used for pre-departure training, interviews, and monitoring during the activity), in compliance with the security measures provided for by the GDPR.

4. Obligation or right to provide data

Providing data for administrative, organizational, and reporting purposes (points 1, 2, 3 of the Purposes) is **mandatory**. Any refusal to provide such data or failure to consent to the processing of health data strictly necessary for accommodation or safety will objectively make it impossible for you to participate in the Erasmus+ mobility. Consent for promotion and dissemination activities (use of photos/videos) is entirely **optional**, and any refusal will in no way prejudice participation in the project.

5. Disclosure of data (Who can it be communicated to?)

Your data will not be disseminated to indeterminate parties. It may, however, be communicated to specific parties, strictly linked to the project organization:

- To the National Agency and the European Commission for reporting obligations;
- To transnational partners (training centers and foreign intermediaries) and **host companies** abroad (or local ones in case of Incoming mobility) for internship placement;
- To accommodation facilities/host families in charge of the *accommodation* service;
- To insurance companies for coverage of accidents, civil liability, and medical assistance during travel;
- To external consultants and international networks of which the organization is a part, exclusively for monitoring and audit activities related to project quality.

6. Data belonging to "special categories" (Art. 9 GDPR), with specific reference to:

- Health status, allergies, or food intolerances;
- Relevant medical conditions, chronic pathologies, or ongoing pharmacological therapies;
- Accessibility requirements, disabilities, or special educational needs/specific support…

will be processed **exclusively** for the following purposes strictly connected to the stay abroad:

- Organization and personalization of the **accommodation** service (e.g., matching with host families or suitable facilities);
- Organization of personalized **support and tutoring** during mobility;
- Safe management of **transfers** and transport;
- Guarantee of **health protection, first aid, and medical assistance** in case of emergency;
- Request for any additional inclusion support contributions from the Erasmus+ National Agency.

Special data will be communicated exclusively to parties strictly necessary for the provision of the services indicated above (e.g., the partner/intermediary organization abroad, accommodation facilities/host families, insurance companies, tutoring staff, and emergency medical personnel) in compliance with the principle of minimization.

7. Data retention period

Data will be retained for the entire duration of the mobility and, following your return, for the period imposed by the reporting and control rules of the Erasmus+ Program (normally 5 years from the formal closure of the financial agreement between National Agency, the Sending partner and the Controller), as well as for the times provided for by national tax and legal regulations.

8. Your Rights (Arts. 15 et seq. of the GDPR)

At any time, you may exercise the following rights provided for by the GDPR by contacting the Association's office by sending an email to **info@aefonline.eu**:

- Request access to your personal data, rectification, or erasure of the same.
- Request the restriction of processing or object to the same.
- Request data portability.
- Withdraw consent at any time (without affecting the lawfulness of processing based on consent before the withdrawal).
- Lodge a complaint with the Data Protection Authority (www.garanteprivacy.it).