



EURASTiP Exchange Programme – Data Management Policy

Version 01 – 18/06/2018

General Data Protection Regulation Compliance

The EURASTiP project partners are subject to the EU General Data Protection Regulation (GDPR) which came into force on 25th May 2018. Data that is collected and processed for the purposes of facilitating and administering the EURASTiP Exchange Programme is therefore subject to GDPR.

Overall management of the EURASTiP Exchange Programme is provided by the EURASTiP partners AquaTT, UGent and EATiP.

Personal Data

To manage the application, selection, monitoring and evaluation processes for the EURASTiP Exchange Programme, it is necessary for some personal data to be requested and processed as set out below.

Programme Applicants

EURASTiP Exchange Programme applicants are required to submit personal data as part of the registration process. Two main categories of personal data are requested. Category 1 data is data required for the purposes of identification of the applicant(s); communication with the applicant(s) and the reporting of results to the European Commission (EC). Category 1 data can be further subdivided into categories 1a and 1b. This data is (for each applicant):

Category

1a

- Name
- Organisation affiliation
- Country of employment
- Video footage (where applicable if vlogs are produced)

Category

1b

- Nationality
- Country of birth
- Date of birth
- Gender
- Home address
- Work address



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- Degree information
- CV
- Host name, address, and contact person
- Residence during exchange
- E-mail address
- Membership aquaculture related organisation

Category 1a data is personal data that may be made publicly available for the purposes of reporting the project results, or because of a legitimate freedom of information request. Category 1b data will be treated as confidential (see '*Confidentiality, Data Use and Data Sharing*' section).

For applicants who are unsuccessful in applying for the EURASTiP Exchange Programme, all personal data will be considered confidential and will not be used or passed to any other parties outside of the project partners.

Category 2 personal data is used for the purposes of evaluating the Exchange Programme applications. Category 2 personal data is not passed on to the European Commission and is treated as confidential.

A third category of personal data is sensitive personal data which is specifically defined within the GDPR and includes ethnic, religious, political, sexual, health and some other data. No sensitive personal data is requested as part of the EURASTiP Exchange Programme application process. Any sensitive data that is given e.g. within the applicant's application form will not be transferred into any other records or processed or used in any way.

Non-Personal Data

Non-personal data provided at the registration stage or generated during the processing and execution of an EURASTiP Exchange Programme will generally be regarded as confidential. Where required, such data may be shared with the EC. Data may also be aggregated and shared publicly. The use of project data is covered by other regulations and policies and it is recommended that each Exchange Programme host formalises a separate data management agreement.

Confidentiality, Data Use and Data Sharing

To process applications, it is necessary that all the data provided by the applicant is transferred between EURASTiP partners (i.e. EURASTiP organisations across jurisdictions). This data is also shared with Exchange Programme Selection Committee members and any experts employed by the European Commission to evaluate the EURASTiP project.

Confidential and personal data will only be shared with Selection Committee members directly involved in the review and selection process for each individual application, with access removed once the application process is complete.



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Data provided for the purposes of applying for an EURASTiP Exchange Programme will only be used for these purposes and will not be passed on to third parties unless required for legal or other contractual purposes.

All partner organisations are signatories to an agreement that includes extensive expectations concerning maintenance of confidentiality and protection of privacy where appropriate. Individuals who are not employed by an EURASTiP partner organisation but who may require access to confidential and personal data for the purposes of Exchange Programme planning, management or coordination are required to sign separate undertakings of confidentiality.

Data Security

All submitted data will be held on computer systems that meet local requirements for data security, which generally include password-controlled access and frequently data encryption. Personal and confidential data will not be transmitted directly by unencrypted email. EURASTiP Exchange Programme applications are administered and managed by UGent (Belgium) in collaboration with AquaTT (Ireland) and EATiP (Belgium). EURASTiP Exchange Programme registrations are submitted through a secure online system managed by Ghent University in Belgium. Registration information is shared by UGent with AquaTT and EATiP, for the purposes of collating and managing Exchange Programme applicant details and registrations. Registration data are also securely archived by AquaTT and EATiP, the overall EURASTiP project coordinator.

Data Access and Deletion

Under GDPR, data subjects (i.e. Exchange Programme applicants) may request a copy of any personal data held by any partner organisation and may object to its processing and under some circumstances request its deletion. Any such requests will be considered by the relevant partner organisation(s) and referred to the appropriate GDPR responsible person to assist with resolution. If the request is not dealt with to the satisfaction of the applicant, the case may be referred to the European Data Protection Supervisor (EDPS). In general, data which is not contractually or legally required to be held will be deleted, and any errors will be immediately corrected.

Full deletion of personal data will be carried out once the information is no longer legally or contractually required to be held.

Consent

It is a requirement of GDPR that all data subjects (i.e. Exchange Programme applicants) give explicit consent to the storage and processing of their personal data. A separate Data Processing Consent Form is therefore provided, and this must be completed and submitted by any individual applying for an EURASTiP Exchange Programme.

Further information

Information on GDPR and its implementation is available from many government and commercial



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sources such as [https://ico.org.uk/for-organisations/guide-to-the-general-data-
protection-regulation-gdpr/](https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/)

Disclaimer: *This document has been compiled based on readily available information about GDPR. If applicants are concerned about the storage and use of their personal information by the EURASTiP project, they should seek qualified legal advice.*