

Tempus Foundation Policy on personal data protection

Introduction

Tempus Foundation is committed to protecting and safeguarding personal data, entrusted to it for the of implementation of the Erasmus+ Programme in Serbia and is taking necessary technical and organizational measures in order to provide the compliance with all relevant personal data protection regulations.

Following you can find more about the main reasons for the processing of your personal data, how these data are collected and processed, methods for ensuring the protection of personal data, the way these data are used and what rights you have concerning your personal data.

Contact details of the Tempus Foundation as the responsible Data Processor, through which you can exercise your rights, as well as the contacts within the European Commission (Data Controller) are also listed below.

The legal grounds

The Tempus Foundation is obliged to provide the appropriate protection of personal data for all the project applicants and beneficiaries of the grants based on the current signed Agreement with the European Commission and the obligations arising from it, in accordance with the EU Regulation 2018/1725, as well as the national legislation on the protection of personal data. Having that in mind, the processing of your personal data is only done in accordance with the following provisions:

- [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018, on the protection of natural persons with regard to the processing of personal data by the institutions, bodies, offices and agencies of the European Union and on the free movement of such data (repealing Regulation (EC) No 45/2001);
- Law on Personal Data Protection (" Official Gazette of RS, No 87/2018), hereinafter: LPDP;
- [GDPR](#)

An additional set of regulations provided by the European Commission (EC) for all beneficiaries i.e. personal data subjects, are further defined within the relevant EC privacy statements, and the information on how to contact the Data Controller can be found on the following [link](#).

Why do we process your personal data?

- The processing of your personal data is done by the Tempus Foundation for the purpose of implementing the Erasmus+ programme, in accordance with special authorizations and exclusively based on instructions provided by the European Commission.

- The processing is necessary for the compliance with special contractual requirements that the Tempus Foundation, as an organisation responsible for the Erasmus+ programme in Serbia, has in relation to the European Commission, in accordance with legal obligations to which European Commission is subject, as the Data Controller;
- Processing of the personal data is necessary for the implementation of a Grant agreement to which the data subject is the beneficiary, or to take further steps on data protection at the request of the beneficiary.

Purpose of data processing

- Managing details of the projects approved for funding for the purpose of monitoring the achievement of the project objectives, the information on the number and type of participants as well as the budgetary and financial aspects of the projects;
- Monitoring the participating organisations in the project to ensure the implementation;
- Collecting statistics from the projects through reporting and the answers provided by the beneficiaries or participants as part of surveys;
- Managing statistics on the answers provided by the beneficiaries, which is essential to demonstrate how the grant is used and if the programme objectives have been achieved;
- Providing support to future participants in the programme etc.

How do we process your personal data?

- Your personal data are processed in a lawful and transparent manner;
- Data are collected exclusively for specified and legitimate purposes and they are no longer processed if it is not compatible with the relevant purpose of processing;
- Data are processed in a suitable manner and limited to what is necessary in relation to the purpose of processing;
- All data must be accurate and, where necessary, kept up to date and;
- Data are kept in form which permits identification of data subjects no longer than is necessary for the purposes for which they are processed;
- Data are processed in a manner that ensures appropriate security of the personal data.

Which personal data are collected and processed?

The data of the contact persons and legal representatives in organisations are processed, such as:

- Title
- First name
- Last name
- Sex/Gender

- Department
- Position
- Mobile number
- Phone number
- Email
- Legal address

The following personal data of participants in the project are processed:

- Passport or ID number
- Title
- First name
- Last name
- Date of birth
- Sex/Gender
- Nationality
- Information about persons with disabilities

[How do we protect and safeguard your personal data?](#)

In order to protect your personal data, the Tempus Foundation has implemented special technical and organisational measures.

Technical measures include:

- Special types of encryptions set up in order to increase "online" security so that the data you upload to your Beneficiary space can only be accessed by authorised persons from the organisation of the beneficiary and the Tempus Foundation;
- Preventing unauthorised access- data from the Beneficiary space cannot be accessed by third parties, i.e. persons without special permission;
- Minimizing the risk of data loss- the data on the Beneficiary space cannot be erased by the Beneficiary. All data are backed up and their storage and destruction are regulated by internal regulations of the Foundation.

Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate "need to know" for the purposes of this processing operation, in a beneficiary organisation as well as within the Tempus Foundation.

[Who has access to your personal data and to whom is it disclosed?](#)

Access to your personal data have:

- Employees and other differently engaged persons in the Tempus Foundation (Data Processor)
- Partner organisations and the European Commission (Data Controller);
- Companies maintaining the Processor's IT systems where the data are stored;

Moreover, keeping in mind that the transfer of your personal data is necessary for the realization of the contract concluded in Your interest between the European Commission (Data Controller) and the National Agencies, and therefore the Tempus Foundation, access to your personal data have both the European Commission and the other National agencies implementing the Erasmus+ programme. More information on the regulations of the European Commission concerning personal data transfer can be found [here](#).

In addition, when it comes to special regulations set by the European Commission in relation to the storage period of your personal data, you can find them [here](#).

[What are your rights and how can you exercise them?](#)

You have a right to access your personal data and contact us at any time, concerning the following rights that are at your disposal:

- The right to request from the Processor the access to personal data and the information concerning the processing (Article 26 LPDP)
- The right to request rectification of incorrectly entered data and amendment of such data (Article 29 LPDP)
- The right to ask for erasure of the data (Article 30 LPDP)
- The right to restriction of processing (Article 31 LPDP)
- The right to transfer data (Article 36 LPDP)
- The right not to be subject to a decision made solely on the basis of automated processing, including profiling (Article 38 LPDP)
- The right to be informed on the personal data breach, if such breach could result in a high risk to the rights and freedoms of natural persons (Article 53 LPDP)
- The right to address a complaint to the Commissioner for information of public importance and personal data protection - Bulevar Kralja Aleksandra 15, 11120 Belgrade, phone number: +38111 3408 900, e-mail:office@poverenik.rs (Article 82 LPDP)
- The right to legal protection if you think your rights under the LPDP have been violated (Article 84 LPDP)
- other rights under the applicable LPDP.

[Other activities of the TF](#)

With your consent, and in accordance with the Law on Personal Data Protection, the Tempus Foundation, acting as the Data Processor, collects and processes your personal data for the purpose of participating in an event or a competition or for the purpose of performing any other type of activities (workshops, webinars, events) organized by the Tempus Foundation, respecting the following rules:

- The Tempus foundation collects and processes Data solely for the said purposes (event, competition, workshop etc.) for scientific-educational purposes with the previous consent of the person to whom the Data relate and which are safeguarded for 1 year, i.e. for as long as there is a legitimate interest for their processing. The Tempus Foundation will not use the Data from the registration form for other

purposes.

- The Tempus Foundation collects the Data based on informed consent of the person to whom the data relate, pursuant to Article 15 of the LPDP;
- The Tempus Foundation stores and safeguards Data in its internal electronic records (databases) applying all necessary organizational, technical or personnel measures for their protection in accordance with the provisions of the applicable LPDP.
- The Tempus Foundation can transfer the data to third parties, of which some are processors and some are users. The Processor, pursuant to Article 4 paragraph 1 item 9) of the LPDP is a natural or legal person, i.e. public authority processing the personal data on behalf of the Controller, whereas the the data user is a natural or legal person, i.e. public authority to whom the personal data have been disclosed whether a third party or not.
- The Tempus Foundation processes and stores personal data in its electronic data base until the person whose data are being processed withdraws the consent. The withdrawal can be made at any time, by sending a notice to e-mail address: hr@tempus.ac.rs, whereas the withdrawal does not effect the processing that has been performed based on the consent prior to the withdrawal.

Contacts

The Tempus Foundation

Žabljačka 12, 11050 Belgrade, Serbia

Phone number/fax: 011/33 42 430

E-mail: hr@tempus.ac.rs

Should you request any information, amendment, withdrawal or erasure of data, or to exercise any of aforesaid rights, you can contact us in the following [way](#).

Also, when your rights regarding the European Commission are in question, you have at your disposal the following contacts [here](#).