



Words of Europe Project

Personal Data Protection and Storage Policy

Introduction

This Data Protection and Storage Policy outlines the principles, processes, and responsibilities for data collection, storage, and processing by the "**Words of Europe**" project, funded by the European Commission through the CERV program (Citizens, Equality, Rights, and Values). This policy is designed to ensure compliance with the General Data Protection Regulation (GDPR) (EU Regulation 2016/679) and other relevant European Union data protection laws.

The lead organization for the project is **Arci Solidarietà Società Cooperativa Sociale**, headquartered at Viale dell'Università 11, 00185 Rome, Italy, which assumes the role of Data Controller. All partners involved in the project act as Data Processors and adhere to this policy when handling personal data.

The partners in the Words of Europe project, along with their respective countries, are:

- **Arci Solidarietà Società Cooperativa Sociale** (Italy)
- **Altera APS** (Italy)
- **Association Community** (France)
- **Faktor Terminal Association** (Hungary)
- **Ligue de l'Enseignement** (France)
- **JEF Europe** (Belgium/Transnational)
- **Mandragola Editrice SCG** (Italy)
- **Subjective Values Foundation** (Hungary)
- **UCCA - Unione dei Circoli Cinematografici Arci** (Italy)

These partners, as Data Processors, ensure the secure handling of personal data in accordance with GDPR and the provisions of this policy.

1. Data Controller and Contact Information

Data Controller: Arci Solidarietà Società Cooperativa Sociale





Legal Address: Viale Dell'Università 11, 00185 Rome (RM), Italy

Email: europa@arcisolidarieta.com

Data Protection Officer (DPO): To ensure GDPR compliance, Arci Solidarietà has appointed a Data Protection Officer (DPO). Any inquiries related to data protection can be directed to the DPO via the above email.

2. Legal Framework and Normative References

This policy is created in accordance with the following legal frameworks:

- **Regulation (EU) 2016/679** - General Data Protection Regulation (GDPR)
- **Directive 2002/58/EC** - ePrivacy Directive
- **European Commission's CERV Program** requirements for data protection

The policy applies to all personal data collected in connection with the "Words of Europe" project. This includes, but is not limited to, participants' names, contact details, photographs, audiovisual material, and any data collected during workshops, debates, artistic residencies, and other project activities.

3. Categories of Personal Data Collected

The following types of personal data may be collected:

- **Contact Information:** Name, Surname, Email Address, Age, Gender, City of residence.
- **Visual and Audiovisual Data:** Photographs, videos, and recordings during project events.
- **Opinions and Feedback:** Ideas, opinions, and contributions during debates, workshops, and other activities.

4. Purpose of Data Collection

Personal data is collected and processed for the following purposes:

- Reporting and auditing requirements for the European Commission.
- Communication with participants regarding upcoming events or project updates.
- Documentation and analysis of contributions to create "Words of Europe" outputs such as the vocabulary.
- Public dissemination of artistic and intellectual outputs produced during the project (e.g., photos, videos, or art exhibits).





5. Data Storage and Retention

All data collected will be securely stored at **Arci Solidarietà's offices at Viale dell'Università 11, 00185 Rome, Italy**, both in physical and digital formats. Arci Solidarietà uses security measures including restricted access and regular audits to safeguard personal data against unauthorized access, alteration, or destruction.

The data will be stored for a period of **four (4) years** following the conclusion of the "Words of Europe" project (**31.10.2024**), in compliance with audit requirements set by the European Commission.

After this period, all personal data will be permanently deleted, except where further retention is legally required.

6. Purpose and Subject of Data Transfer

The Data Controller (Arci Solidarietà) and the Data Processor (external partner) agree that the personal data subject to transfer will be processed exclusively for the following purposes:

- Ensure the execution of the activities planned within the "Words of Europe" project.
- Allow monitoring and evaluation of the project activities by competent authorities.

7. Legal Basis for Data Processing

Personal data is processed on the following legal bases as per **Article 6(1)** of the GDPR:

- **Consent:** Participants voluntarily provide consent for their data to be processed for the purposes outlined above.
- **Legitimate Interest:** Data processing is necessary for the administration of the project and for fulfilling reporting obligations to the European Commission.
- **Legal Obligation:** Compliance with European Union funding requirements and audit processes.

8. Consent Withdrawal and Data Subject Rights





Participants have the right to withdraw their consent for the processing of their personal data at any time. Requests for withdrawal should be directed to europa@arcisolidarieta.com. Upon receiving a request, Arci Solidarietà will:

- Cease processing the individual's data unless a legal obligation mandates its retention.
- Ensure the data is deleted from all storage locations.
- Confirm the completion of the request with the data subject.

Participants also have the following rights under the GDPR:

- **Right of Access:** Individuals can request a copy of their personal data held by the project.
- **Right to Rectification:** Participants can request corrections to any inaccurate or incomplete personal data.
- **Right to Erasure ("Right to be Forgotten"):** Participants can request the deletion of their personal data when it is no longer necessary for the purposes for which it was collected.
- **Right to Restrict Processing:** Individuals may request limitations on the processing of their data under certain conditions.
- **Right to Data Portability:** Individuals may request that their personal data be transferred to another data controller in a structured, commonly used format.
- **Right to Object:** Participants can object to the processing of their personal data if it impacts their rights and freedoms.

To exercise any of these rights, participants can contact the Data Controller at

europa@arcisolidarieta.com

9. Data Breach Notification

In the event of a data breach that affects personal data, Arci Solidarietà will notify the relevant supervisory authority (Garante per la Protezione dei Dati Personali in Italy) and, where required by law, affected data subjects, in accordance with **Articles 33 and 34 of the GDPR**.

10. Data Transfer to Third Parties

Personal data collected will only be shared with project partners who are bound by this policy. Data will not be transferred to third parties outside of the project unless required by law or with explicit consent from the participants.





The Data Processor may not transfer personal data to third parties or subcontract the processing of data without the prior written consent of the Data Controller.

In case of subcontracting, the Data Processor guarantees that the subcontractor complies with all provisions of this agreement and the GDPR.

11. Changes to This Policy

Arci Solidarietà reserves the right to modify this policy to comply with updates to legal regulations or operational needs. Any changes to this policy will be communicated to participants in a timely manner.

