



## Data Protection Declaration

The members of the CIRCLE Consortium (University of Graz, Chalmers University of Technology, Delft University of Technology, Leiden University and Norwegian University of Science and Technology), as joint controllers, take data protection very seriously and treat your personal data confidentially and in accordance with the legal requirements.

This Data Protection Declaration is designed to inform (1) you, as an applicant – and in case of selection for the Erasmus Mundus Master on Circular Economy (CIRCLE) – as a grantee of the programme, as well as (2) referees in accordance with Articles 12, 13 and 14 of the General Data Protection Regulation (GDPR), on the purpose, legal basis, and your rights regarding the processing of personal data by the CIRCLE Consortium.

### **Purpose, scope and legal basis of data processing:**

#### 1. Applicants/Grantees

a) We process your personal data indicated in the online application (e.g. personal information, study path) as well as your application documents according to the programme call for the purpose of the application process, the orientation week/summer school and the graduation of the Erasmus Mundus Master on Circular Economy (CIRCLE).

The legal basis for this processing is

- the performance of the contract or in order to take steps prior to entering into the contract in the context of the application process and furthermore the organization and completion of the Erasmus Mundus Master on Circular Economy pursuant to Art 6 § 1 (b) GDPR,
- the compliance with a legal obligation pursuant to Art 6 § 1 (c) GDPR in connection with the relevant national law on study regulations,
- the performance of a task carried out in the public interest which is given in the implementation of the double degree programme pursuant to Art 6 § 1 (e) GDPR in connection with the relevant national law and also the regulation (EU) 1288/2013,
- the legitimate interest of the CIRCLE Consortium with regard to quality assurance as well as for public relations and statistical purposes pursuant to Art 6 § 1 (f) GDPR,
- the fulfilment of legal obligations in regards to possible data transfer to the respective competent bodies for the purpose of control and audit duties pursuant to Art 6 § 1 (c) GDPR,
- the legitimate interest of the CIRCLE Consortium with regard to data transfer to “MARSH” (insurance broker) and to “Europ Assistance SA” (insurance company) for the completion of an insurance contract for the purpose of fulfilment of the Erasmus Mundus Programme Guidelines pursuant to Art 6 § 1 (f) GDPR,
- the legitimate interest of the CIRCLE Consortium and the associated partners with regard to the transmission of data to the associated partners for their organization of the orientation week/summer school pursuant to Art 6 § 1 (f) GDPR.

b) In case of an application for an additional mobility at one of the associated partner universities [Curtin University (Australia), Tsinghua University (China), and Waseda University (Japan)], your data will also be transmitted to the respective mobility university for the purpose of the evaluation and selection of your application, and, if applicable, for the implementation of the mobility period.

The legal basis for this processing is



- the performance of the contract or in order to take steps prior to entering into the contract in the context of the application process pursuant to Art 6 § 1 (b) GDPR,
- the performance of a task carried out in the public interest which is given in the implementation of the double degree programme pursuant to Art 6 § 1 (e) GDPR in connection with the relevant national law and also the regulation (EU) 1288/2013.

Processing of your data and documents by the CIRCLE Consortium is a necessary step in the evaluation and selection process for the programme. Therefore, not providing the relevant personal data will result in your application not being considered for the programme.

The CIRCLE Consortium will, as far as is reasonably practical, anonymize or pseudonymize all Personal Data contained in statistics, reports and summaries to minimise the amount of Personal Data processed.

## 2. Referees

We process personal data of referees (first name, last name and any other personal data included in the letter of recommendation) submitted by the applicants to the programme and indicated in the letters of recommendation.

The legal basis for this processing is the legitimate interest by a third party, the students to fulfil the application requirements and the legitimate interest of the consortium to choose the most qualified applicants, pursuant to Art 6 § 1 (f) GDPR.

### **Duration of storage:**

- In case of a contract/contractual obligation, legal obligation: Your personal data will be stored as long as necessary for the organization and completion of the Erasmus Mundus Master on Circular Economy/to comply with the legal obligation.
- In case of legitimate/public interest: Your data will be processed as long as necessary for the preservation of the legitimate/public interest or until (justified) objection is raised.

In addition, we will store your data if there are statutory retention periods or if the statute of limitations regarding potential legal claims is still open.

### **Transmission of your personal data:**

We transfer your personal data to the following recipients:

- Control and supervisory authorities  
E.g. the European Commission ([https://eacea.ec.europa.eu/sites/eacea-site/files/privacy\\_statement\\_emt.pdf](https://eacea.ec.europa.eu/sites/eacea-site/files/privacy_statement_emt.pdf)), European Anti-Fraud Office, European Court of Auditors [ECA] or Austrian Court of Audit, Austrian Federal Ministry of Finance (Transparency Portal))
- Insurance company/broker  
The following data will be transmitted to “MARSH” (insurance broker) and to “Europ Assistance SA” (insurance company) in the context of the conclusion of an insurance contract: family name, first name, country of official residence, gender, date of birth, start date of the coverage, end date of the coverage, email address, and type insured (e.g. student).
- Associated Partners (Curtin University, Tsinghua University, Waseda University)  
Given the location of the associated partners in third countries, transfer of personal data to third countries is necessary. The transfer to Japan (Waseda University) is based on an adequacy decision Art 45 § (1) GDPR. The transfer to Australia (Curtin University) and China (Tsinghua University) is based on:



- the performance of a contract/implementation of pre-contractual measures taken at the data subject's request according to Art 49 § 1 (b) GDPR,
  - the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person according to Art 49 § 1 (c) GDPR,
  - important reasons of public interest according to Art 49 § 1 (d) GDPR.
- Software provider  
Your personal data will also be transferred to mayermayer Informations.Werkstatt, software provider of the Biobs application platform.

### Your rights:

Where the processing of your personal data is concerned, you have the following rights at all times with regard to the University of Graz as coordinator of the programme; these rights can be exercised by emailing: [emcircle@uni-graz.at](mailto:emcircle@uni-graz.at)

- the right of access to the personal data in question (Article 15, GDPR),
- the right to rectification (Article 16, GDPR) or erasure (Article 17, GDPR) or restriction of processing (Article 18, GDPR),
- the right to data portability (Article 20, GDPR),
- the right to object (Article 21, GDPR),
- the right to withdraw consent (Article 7(3), GDPR), which shall not affect the lawfulness of processing based on consent before its withdrawal.

In principle, these rights can be exercised at all partner universities in the CIRCLE Consortium.

You also have the

- right to lodge a complaint (Article 77, GDPR),

which should be addressed to the Austrian Data Protection Authority, Barichgasse 40-42, 1030 Vienna, telephone: +43 1 52 152-0, email: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at), as the relevant regulatory authority.

In principle, the rights concerned must be asserted at the home university. Your request may therefore be forwarded to the respective consortium partner.

### Our contact details:

- University of Graz, Office of International Relations, Universitätsplatz 3, 8010 Graz, email: [emcircle@uni-graz.at](mailto:emcircle@uni-graz.at). The data protection officer can be contacted at: [dsba@uni-graz.at](mailto:dsba@uni-graz.at)
- Chalmers University of Graz, Department of Space, Earth and Environment, Maskingränd 2, 41296 Gothenburg, email: [ulrika.lundqvist@chalmers.se](mailto:ulrika.lundqvist@chalmers.se). The data protection officer can be contacted at: [dataskydd@chalmers.se](mailto:dataskydd@chalmers.se)
- Delft University of Technology/Leiden University, Van Steenis, Einsteinweg 2, 2333 CC Leiden, email: [ocie@cml.leidenuniv.nl](mailto:ocie@cml.leidenuniv.nl). The data protection officer of Delft University of Technology can be contacted at: [privacy-tud@tudelft.nl](mailto:privacy-tud@tudelft.nl). The data protection officer can be contacted at: [privacy@bb.leidenuniv.nl](mailto:privacy@bb.leidenuniv.nl)
- Norwegian University of Science and Technology, Department of Energy and Process Engineering, Realfagbygget, E4-150, Gloschaugen, email: [johan.berg.petterson@ntnu.no](mailto:johan.berg.petterson@ntnu.no). The data protection officer can be contacted at: [sikkerhet@ntnu.no](mailto:sikkerhet@ntnu.no)