



**DATA PROTECTION
POLICY
IO.3 (PIM)**



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1. Introduction

The BEYOND NEET(D)s Personal Integration Map (PIM) is an online platform that collects manually inserted data by mentors about professional achievements of mentees.

As the main purpose of the BEYOND NEET(D)s Personal Integration Map (PIM) is to collect data from mentees, data and privacy protection are essential components of a GDPR compliant implementation of the project. The project team considers the privacy of users a priority.

Educational institutions involved in the BEYOND NEET(D)s Personal Integration Map (PIM) development are committed to complying with data protection act and GDPR (General Data Protection Regulation), which can be found:

GDPR (EU) 2016/679: <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

Later in this document the BEYOND NEET(D)s Personal Integration Map (PIM) are called “service”.

2. Basic concepts of data protection

2.1. What is personal information?

All data related to an identified or identifiable person is personal data. Information such as names, telephone numbers, location data is personal data.

The data protection principles must always be observed when processing personal data.

The data-protection principles state that personal data must be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject.
- collected and processed for a specific and lawful purpose.
- collected only to the amount necessary with regard to the purpose of the processing.
- updated when required – inaccurate personal data must be erased or rectified without delay.
- kept in a form which only permits the identification of data subjects for as long as is necessary for the purposes of processing the personal data; and
- processed confidentially and securely.

These principles have been taken into account when developing BEYOND NEET(D)s Personal Integration Map online platform for mentors and mentees.

2.2. Controller and data processor

There are two kinds of roles in processing personal data. A controller is an individual or organisation that determines the purposes and means of the processing of personal data. A company, authority or corporation that collects your personal data is called a controller. A processor is person/ organisation with access to the personal data collected by the controller.

In BEYOND NEET(D)s Personal Integration Map (PIM) the controller is Jugend am Werk Steiermark GmbH in Austria. Mentors and mentees registered to the service can be seen as processors.

Data will not be shared with third parties.

3. Rights of the data subject according to the GDPR

According to the General Data Protection Regulation (GDPR), data subjects have several rights. In the following paragraph is explained how the rights are taken into consideration.

3.1. Right to obtain information on the processing of their personal data

Data subjects have the right to be informed of the collection and processing of their personal data. The processing of personal data shall be done in a transparent manner. The information on processing must be provided in a concise, transparent, intelligible, and accessible form and be presented in clear and plain language.

The data subject can give his or her consent to processing the data subject's personal data. Such consent must be a freely given, specific, informed, and unambiguous indication of the data subject's agreement to the processing of personal data relating to him or her. The data subject can give a written or oral statement of his or her consent or express it by some other clear, affirmative act, such as ticking a box on a website. It must be as easy to withdraw consent as to give it.

3.2. Right of access to their data

Data subjects have the right to receive confirmation from the controller on whether the controller is processing personal data that concerns them. In BEYOND NEET(D)s Personal Integration Map online platform service the user can see his/her own personal data via his/her own login.

3.3. Right to rectification of their data

Data subjects have the right to demand the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

If the user wants to have his/her data rectified, the user can contact us and make a request directly to contact@findyourtrack.eu

3.4. Right to the erasure of their data

The user has the right to erase her/his personal data.

If the user wants to erase his/her personal data, the user can contact us and make a request directly to contact@findyourtrack.eu

3.5. Right to restrict the processing of their data

The user can request processing of his/her personal data to be restricted. In certain cases, user can request the controller to restrict the processing of his/her personal data.

If the user restricts processing, the user can contact us and make a request directly to contact@findyourtrack.eu

3.6. Right to data portability

The user has the right to receive the personal data concerning himself/herself from the controller in a commonly used format to deliver them to another service provider. Transferring user's personal data does not necessarily mean that it will be erased from the original controller's systems. However, the user does have the right to request the controller to erase your personal data from its file.

If the user wants to receive his/her personal data in a commonly used format, the user can contact us and make a request directly to contact@findyourtrack.eu

3.7. Right to object to the processing of their data

The user can object to the processing of his/her data. In certain situations, the user can also object to the processing of his/her own personal data, i.e., request that it not be processed at all. Objecting is possible if the controller is processing user data based on public interest or the exercise of official power or on the basis of legitimate interest. An example of processing based on legitimate interest would be using the user personal data for direct marketing. (BEYOND NEET(D)s Personal Integration Map online platform service do not use the user's personal data for direct marketing.)

If you don't want your data processed, contact us, and make a request directly to contact@findyourtrack.eu

3.8. Right not to be subject to a decision based solely on automated processing

The user has the right to demand human involvement in decisions concerning user. The BEYOND NEET(D)s Personal Integration Map online platform service does not automatically profile the user or make automated decisions.

4. How privacy is taken into account in the application/software development

4.1. Collecting data in BEYOND NEET(D)s Personal Integration Map online platform

In this service the data is collected direct from the person who has registered to the service. Upon registration, the platform will collect data about:

- password
- e-mail address of user
- age
- name

When using the online platform, the platform collects manually (by the mentor) inserted data about:

- milestones and reached tasks
- dates and time frame

What kind of data do users see from each other?

- The mentors only see the manually inserted data of their mentees; no other mentors see any data of mentees they do not work with in the field of mentoring / coaching
- Mentees see their milestones and tasks as bespoke with their mentor
- Mentees never see each other's data

5. Processing data in the BEYOND NEET(D)s Personal Integration Map online platform

The BEYOND NEET(D)s Personal Integration Map (PIM) which will be implemented through a webserver, will access the data collected with it and stored in the Jugend am Werk Steiermark GmbH database.

It will calculate correlations between co-dependencies and then allow the users (mentor and mentees) to log in, access, and further utilise the results from their web browser.

6. Information provided for the users of the online platform

This following information is provided for the users, when they are registering to the service: They are asked to agree with it before continuing with the service.

Data Protection Policy (Data regulations)

The BEYOND NEET(D)S Data Protection Policy assures that the data processing and storage is compliant to the European Data Protection Regulation GDPR (EU) 2016/679: <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

Introduction

The BEYOND NEET(D)S Personal Integration Map is used by mentors and mentees and it supports to elaborate personal milestones and tasks for professional careers.

What data is collected

Users of the online platform (“mentees”):

- Personal identification information (user-name, E-mail address; if necessary: phone number, age)

How data is collected

- Data is collected direct from the registered person by the mentor and inserted manually in the mentees profile on the online platform.

How data is used:

- To manage your account
- To agree on milestones and tasks defined with your mentor

How data is stored:

BEYOND NEET(D)s Personal Integration Map (PIM) securely stores your data at the server of Jugend am Werk Steiermark (AT) which are updated on a regular basis and are included in a cascading backup-cycle.

The BEYOND NEET(D)s products will stay freely accessible for 2 years after the project end. Active data is stored for 6 months after the project ends, unless the user wants to delete his/her account earlier. See you rights below.

Security description of the service (Technical (IT) measures):

Appropriate and proper technical and organisational security measures are taken to ensure that there is no unauthorised access to the personal data that is hold and that it is not used, destroyed, modified, made public or misused in any other way.

Any access to a user's personal data and any actions are only possible after the user has been logged in. As long as the user is logged in the credentials are stored safely in the application to authenticate against the backend.

Client-Server communication

All the communication between the browser and the web server is always fully encrypted using TLS. HTTP Strict Transport Security is enabled as additional barrier to prevent man-in-the-middle-attacks.

Login credentials are only sent for initial authentication.

Data protection rights of the users:

- **The right to be informed**

The user is informed about the Data Protection policy and Terms and Conditions when she/he is signing into the platform. She/he confirms that she/he has read and accepted it.

- **The right of access**

The user can see his/her own personal data via his own login pages.

- **The right to rectification**

If the user wants to have his/her data rectified, the user can contact us and make a request directly to contact@findyourtrack.eu

- **The right to erasure**

If the user wants to erase his/her personal data, the user can contact us and make a request directly to contact@findyourtrack.eu

- **The right to restrict processing**

If the user restricts processing, the user can contact us and make a request directly to contact@findyourtrack.eu

- **The right to data portability**

If the user wants to receive his/her personal data in a commonly used format, the user can contact us and make a request directly to contact@findyourtrack.eu

- **The right to object**

If the user does not want his/her data processed, the user contact us and make a request directly to contact@findyourtrack.eu

- **Rights related to automated decision making and profiling**

The application does not automatically profile the user or make automated decisions.

What are cookies?

Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our software, we may collect information from you automatically through cookies or similar technology.

For further information, visit allaboutcookies.org.

Does the BEYOND NEET(D)s Personal Integration Map (PIM) use cookies?

The app does not use cookies and only uses local media assets. No external services are contacted except the BEYOND NEET(D)S backend.

Privacy policies of other websites

This privacy policy applies only to this online platform, so if you click on a link to another website, you should read their privacy policy.

Changes to the privacy policy

The BEYOND NEET(D)S project keeps its privacy policy under regular review and places any updates on this document. This privacy policy was last updated in January 2023.

How to contact us

If you have any questions about the privacy policy or the data we hold on you, please do not hesitate to contact us via contact@findyourtrack.eu

For more information <https://www.findyourtrack.eu/>