



## Data Management Policy

**Version 01 – August 2020**

### General Data Protection Regulation Compliance

The SIMBA project partners are subject to the EU General Data Protection Regulation (GDPR) which came into force on 25<sup>th</sup> May 2018. Data that is collected and processed for the purposes of facilitating and administering SIMBA training courses and events is therefore subject to GDPR.

Overall management of the SIMBA training courses is provided by University of Parma in collaboration AquaTT and Luke.

### Personal Data

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

#### *Training Course Applicants*

SIMBA training course applicants are required to submit personal data as part of the application process. Personal data means all data relating to an individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller (i.e. SIMBA project partners). For the purpose of the SIMBA training courses, applicants are required to provide the following personal data:

- Name
- Email address
- Telephone number
- Gender
- Organisation name
- Organisation type
- Country
- Position
- Highest qualification (BSc/MSc/DVM/PhD)
- Research category
- Previous relevant experience

Some of this personal data may be made publicly available for the purposes of reporting project results, or because of a legitimate freedom of information request (e.g. name, organisational affiliation, gender). However, all other personal data will be treated as confidential (see 'Confidentiality, Data Use and Data Sharing' section). For instance, for applicants who are unsuccessful in applying for SIMBA training courses, all personal data will be considered confidential and will not be used or passed to any other parties outside of the project partners. Similarly, some personal data is additional CV information such as qualifications and previous relevant experience and is used for the purposes of evaluating training course applications. This personal data is not passed on to external parties such as the European Commission and is treated as confidential. An additional type 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 SIMBA training course 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 application stage or generated during the processing and execution of a SIMBA training course will generally be regarded as confidential. Where required, such data may be shared with the European Commission. 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 training course provider formalise 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 SIMBA partners (i.e. SIMBA organisations across jurisdictions). This data is also shared with any experts employed by the European Commission to evaluate the SIMBA project. Data provided for the purposes of applying for a SIMBA training course 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 a SIMBA partner organisation but who may require access to confidential and personal data for the purposes of event 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 e-mail. SIMBA training course applications are administered and managed by AquaTT (Ireland) in collaboration with University of Parma. SIMBA training course applications are first emailed to AquaTT by interested applicants. These application forms are then shared by AquaTT with University of Parma for the purposes of collating

and managing training course applicant details and registrations. Application data may also be securely archived by Luke, the overall SIMBA project coordinator. We will never share your personal data outside of the project partners without receiving prior permission from you to do so.

## Data Access and Deletion

Under GDPR, data subjects (i.e. training course applicants) may request a copy of any personal data held by any SIMBA 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. training course 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 by any individual applying for a SIMBA training course. This should be attached to the training course registration email.

## Further information

Information on GDPR and its implementation is available from many government and commercial sources such as <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

Further information: for any additional information or clarifications please contact Jane Maher, AquaTT ([jane@aquatt.ie](mailto:jane@aquatt.ie))

**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 SIMBA project, they should seek qualified legal advice.*