

PRIVACY POLICY

About us

The WTD platform (the Platform), located at the Internet address <https://weteachdata.eu/>, was created as a result and for the purposes of the implementation of the activities of the project "**We Teach DATA – Inspire Teachers to Integrate DATA Science in STEM Subjects**" (the WTD Project and/or the Project), Project Reference 2022-1-BG01-KA220-SCH-000085398, which is funded by the Erasmus+ program of the European Commission. Additional information can be found in the menu "About" on the Platform website.

The Platform is administered by RAABE Bulgaria Ltd. (RAABE Bulgaria). RAABE Bulgaria is a company registered in the Commercial Register maintained by the Registry Agency of the Republic of Bulgaria under UIC 121250175, with headquarters and management address: 147, Tsarigradsko Shosse Blvd., fl. 6, 1784, Sofia, Bulgaria; telephone: +359 2 974 1781, e-mail address: office@raabebg.com. RAABE Bulgaria implements the activities of the WTD project in the role of Project coordinator.

The contacts of the Data Protection Officer in connection with the implementation of the WTD Project are:

RAABE Bulgaria Ltd.

147, Tsarigradsko Shosse Blvd., fl. 6, 1784, Sofia, Bulgaria

write2us@weteachdata.eu

Personal data protection officer: Katerina Kasabova

1. Our treatment of your personal data

RAABE Bulgaria considers the protection of personal data of great importance and collects and processes personal data only in compliance with the requirements of national and European legislation. The purpose of this "Privacy Policy" is to inform you about how we process your data and what personal data we would collect about you, for what purpose and term, as well as about your rights in this regard.

The security of the data you have entrusted to us is very important to us. That is why we protect your data by applying all appropriate technical and organizational means at our disposal to prevent unregulated access, unauthorized or malicious use, loss or premature deletion of information.

2. What information do we collect and why?

We may collect personal data about you when you use the Platform or register for the events on the Project. We require your personal data for the purposes of providing full access to the resources and functionalities of the Platform, to comply with a legal obligation or to protect our legitimate interest. Of course, in some cases, you yourself provide us with this information by choosing and agreeing to send us information about yourself. Without this data, we would not be able to provide the relevant services. If you do not provide us with identification data, we would not be able to provide you with access to the

Platform resources or register you to participate in any of the Project events. Depending on the functionalities you use, we may collect and process the following information about you:

General personal data to personalize you:

Name and surname.

To provide access to the resources under the WTD project related to the functioning of the Platform, conducting events under the Project, fulfilling other legal and contractual obligations in connection with the implementation of the Project:

When registering on the Platform: data about the educational institution where you work, electronic address (email) and password;

Contact data: electronic address (email);

Letters and e-mail messages we receive from you in our communication;

Other data we may also collect about you are: IP address, country of origin.

3. Purpose of processing your data

We process the personal data we collect most often for the following purposes:

To provide full access to the Platform's resources and functionalities:

establishing the user's identity;

providing access to the Platform resources;

providing access to an online training course;

registration for participation in Project events;

issuing certificates of achievement and/or participation in an event.

To fulfil our legal obligation:

obligations arising from the Contract for the implementation of the WTD Project between RAABE Bulgaria and the National Agency and the signed Agreements with the project partners organisations, as well as from the General Terms and Conditions and the Financial and Contractual Rules applicable to projects financed under the Erasmus+ program of the European Commission;

obligations to provide information to all state commissions and regulatory bodies;

providing information to the court and law enforcement authorities.

To protect our legitimate interest:

measures to protect the WTD platform and platform users against cyber-attacks;

measures to prevent and detect fraud attempts, including the transmission of information to competent public authorities;

measures to manage various other risks.

The main reason for the specified types of processing is to protect our legitimate interest and, in particular, our activity in connection with the implementation of the WTD project, making it clear that all measures taken by us guarantee the balance between our interests and your fundamental rights and freedoms.

4. Who we share your information with:

RAABE Bulgaria implements the activities under the WTD project in partnership with six other organizations (educational institutions, higher education institutions and commercial companies). Part of the WTD project partners may be among the recipients of personal data collected through the Platform.

We do not provide your personal data to third parties before we have made sure that all technical and organizational measures have been taken to protect this data, striving to implement strict controls for the fulfilment of this purpose.

The provision of personal data is in some cases mandatory in order to comply with our legal obligations. In these cases, the recipients of your personal data might be: regulatory authorities, incl. state commissions, institutions and agencies, prosecutor's office, courts, the National Agency responsible for the management of the Erasmus+ program at national level, the European Prosecutor's Office, the European Commission and others to whom we are obliged to provide personal data under the applicable legislation.

5. Use of cookies

RAABE Bulgaria uses functional cookies regarding the users' location (country, region, time zone, IP address), as well as their interests regarding the content and resources of the WTD platform.

6. Processing of anonymized data

We process your data for statistical purposes; this means for analyses where the results are only generalizable and therefore the data is anonymous – for example, for preferences of a given group of users towards a particular language version of the Platform. Identification of a specific person from this information is impossible.

7. Security

RAABE Bulgaria implements measures to protect your personal data from accidental loss and unauthorized access, use, modification or disclosure. There are in place Policies and Procedures, which have been designed to protect the information from loss, misuse and improper disclosure. In addition, we implement further information security measures, including access control, strict physical security and reliable information collection, storage and processing practices.

Furthermore, we apply technical measures such as encryption and anonymization of collected personal data.

8. Data retention periods

We store all the information we have collected about you and destroy it within the statutory time limits, and if there are none – within the time limits determined by us and after final settlement of all our obligations. **We do not keep your data indefinitely.**

Some of the deadlines are:

5 years after the full implementation of all WTD project activities, in connection with our obligations arising from the receipt of funding under the Erasmus+ program of the European Commission;

10 years under the Accounting Act of the Republic of Bulgaria for storage and processing of accounting data;

5 years in regard to the obligation to provide information to the court, competent state authorities, etc. on the grounds provided for in the applicable national and European legislation.

In case of anonymization of personal data, the deadlines do not apply, as we cannot identify you.

9. Transfer between countries

The transfer, storage and processing of personal data is ensured by modern technical means.

RAABE Bulgaria will not transfer your data outside the EEA without complying with legal requirements, and will implement appropriate safeguards to maintain the confidentiality of your information.

RAABE Bulgaria does not transfer any data collected through the WTD platform to companies or organizations in third countries.

10. Your rights

At any time, you can ask RAABE Bulgaria to provide you with information about the personal data collected and stored for you. You may also request RAABE Bulgaria to correct, delete or update such personal data. RAABE Bulgaria also guarantees your right to object to the processing of personal data. You can withdraw your consent to the collection, storage and use of your personal data at any time. However, withdrawal will not affect data lawfully processed prior to withdrawal.

Description of your rights:

Access to data	You can ask us: <ul style="list-style-type: none">• to confirm that we are processing your personal data;• to provide a copy of that data;• to provide you with information about your personal data, such as what data we have, how we use it, who we disclose it to, whether we transfer
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	it abroad and how we protect it, how long we keep it, what rights you have, how you can make a complaint, how we have acquired your data to the extent that this information has not already been provided to you through this Policy.
Correcting data	You can ask us to correct or supplement your inaccurate or incomplete personal data. We may ask you to verify the inaccuracy of the data before we correct it.
Deleting data	<p>You can request that we delete your personal data in the following cases:</p> <ul style="list-style-type: none"> • it is no longer necessary for the purposes for which it was collected; or • you have withdrawn your consent (if data processing is based on consent); or • you exercise a legal right to object; or • it has been unlawfully processed; or • there is a legal obligation in this regard. <p>We are under no obligation to respect your request for deleting your personal data if its processing requires:</p> <ul style="list-style-type: none"> • to fulfil our legal or contractual obligation (e.g. financial reporting); or • to establish, exercise or defend our legal claim.
Data portability	<p>You can ask us to provide your personal data in a structured, widely used and machine-readable format, or you can request that it be directly "ported" to another data controller, but only if:</p> <ul style="list-style-type: none"> • the processing is based on your consent; and • processing is done by automatic means.
Right to object	You can object at any time to the processing of your personal data based on our legitimate interests, if you consider that your fundamental rights and freedoms dominate these interests.
Complaints	You have the right to file a complaint with the supervisory authority: Commission for Personal Data Protection of the Republic of Bulgaria. Address: 2, Prof. Tsvetan Lazarov Str., 1592, Sofia, Bulgaria or at www.cdpd.bg .

To exercise your rights, you can contact us using the contact details provided at the above in this Policy. Please consider the following:

Identity. We take the confidentiality of all documents containing personal data seriously. For this reason, please send us your requests using your e-mail address with which you have registered on the WTD Platform. We reserve the right to verify your identity by requesting additional information.

Fees. There is no charge for exercising your rights in relation to personal data processing, except where the request for access to information is unfounded, or unnecessarily repeated on multiple occasions, in which cases we would charge a reasonable amount for administrative costs. If applicable, we will inform you of any charges before considering the specific request.

Deadline for response. We respond to all valid requests within one month, unless the request is particularly complex, or if you have made multiple requests, in which case we will respond within a maximum of three months. We will let you know if we need more than one month. We reserve the right

not to respond to your request if it negatively affects the rights and freedoms of other personal data subjects.

11. Changes to this Privacy Policy

This Policy may be changed and updated. Any changes will be effective immediately upon their posting on the WTD Platform. Regularly reviewing the Platform ensures that you are always aware of what information we collect, how and for what purposes we use it, and under what circumstances (if any) we will share it with other parties.

If you have any questions regarding data protection, you can contact the Data Protection Officer:

Katerina Kasabova

RAABE Bulgaria Ltd.

147, Tsarigradsko Shosse Blvd., fl. 6, 1784, Sofia, Bulgaria

write2us@weteachdata.eu

This Privacy Policy was last updated on 21.02.2025.