

Specific Privacy Statement

Western Balkans Alumni Association Tracer Study 2021

Processing operation: Western Balkans Alumni Association Tracer Study 2021

Data Controller: European Commission, Directorate-General for Education, Youth, Sport and Culture, International Cooperation Unit (DG EAC.C.3)

Record reference: DPR-EC-01011

Introduction

The European Commission is committed to protect your personal data and to respect your privacy. The European Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001) (hereinafter '[Regulation \(EU\) 2018/1725](#)').

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

1. Purpose, responsible institutions and legal basis: Why and how do we process your personal data?

The Western Balkans Alumni Association Tracer Study 2020 aims to capture the varied study experience of students and graduates who have studied within and outside the Western Balkans. By comparing the diverse higher education systems, it is possible to draw useful conclusions that can highlight deficits in teaching and learning and at the same time identify opportunities for improvements in the Western Balkans.

1.1 Responsible institutions

The survey is commissioned by the European Commission, International Cooperation Unit in Directorate-General for Education, Youth, Sport and Culture (DG EAC, see 7 Contact Information). The **Data Controller** is then DG EAC.C3.

The **Data Processor** for the survey is a consortium consisting of the following institutions:

- *Institute for Advanced Studies (IHS)*, Vienna, Austria
- *Gesellschaft für Internationale Zusammenarbeit (GIZ)*, Bonn, Germany
- *Mosaic GmbH*, Cologne, Germany
- *Pietzpluswild GmbH*, Cologne, Germany.

The consortium conducts this survey in its function as a Service Provider for DG EAC under framework contract EAC/53/2018 (Provision of services for Erasmus+ International Student and Alumni Networks). In particular, the Institute for Advanced Studies (IHS) as a research institution is the consortium partner mainly responsible for the Western Balkan Tracer Study.

1.2 Legal basis

As this online survey collects and further processes personal data, the applicable legislation is Regulation (EU) 2018/1725. We process your personal data based on the following provisions laid down in Articles 5(1) of Regulation (EU) 2018/1725:

- (a) processing is necessary for the performance of a task carried out in the public interest;
- (d) it is based on your consent, for the following purpose:
 - participating in a prize draw (optional) following the survey.

The Union law which is the basis for the processing based on Articles 5(1)(a) of Regulation (EU) 2018/1725 is the Treaty of the European Union, and more specifically its Articles 1 and 11, Article 298 of the Treaty on the Functioning of the European Union, read in conjunction with Recital 22 of Regulation (EU) 2018/1725), as well as the Protocol 2 on the application of the principles of subsidiarity and proportionality.

2. What personal information do we collect and through which technical means?

The personal data collected in connection with the survey falls into two categories: **survey data** and **data for a prize draw**. Survey data and data for the prize draw are stored separately from each other and cannot be matched. The entry of any information is voluntary.

2.1 Survey Data

The data collected and further processed are contextual data necessary for a meaningful analysis of the survey results. *In particular, the Data Controller will collect data on the respondents'*

- sociodemographic background (gender, year, citizenship(s), country of residence, country of work and country of study)
- educational career
 - place of high school graduation and study location(s)

- name of the higher education institution they attend in the Western Balkans
- number of studied semesters in and outside of the Western Balkans
- number and level of higher education degree(s)
- respondents' motivation to study abroad
- details on the respondents' study experience outside the Western Balkans (start year, end year, study field, study programme, host countries, details on funding by a mobility programme used to cover expenses during the study experience outside the Western Balkans)
 - experienced difficulties
 - experienced modes of teaching and learning (incl. experienced teachers' competencies)
- respondents' satisfaction with their study experience outside the Western Balkans and the personal impact of this experience (incl. the skills and abilities developed)
- comparisons made by respondents between their study experience at their university of the Western Balkans and their (cumulative) study experience outside the Western Balkans
 - comparisons regarding lecturers, curricula and study organisation, the physical and digital infrastructure
- respondents' opinions on what should be improved in the higher education system of the Western Balkans (regarding the organisation of the study programmes, teaching systems, curricula and support system)
 - respondents' own recommendations
- past and current employment details:
 - current employment status
 - field of work of current occupation
 - own job skills and skill demands of the current occupation
 - satisfaction with current occupation
- respondents' preferences on the future place of residence (incl. motivations)
- feedback or criticism from the respondents on the questionnaire and any content covered

Name, surname or other data unique to a person (such as e-mail address or other contact information) are not collected within the survey itself.

2.2 Data for prize draw (optional)

Respondents who choose to attend the prize draw following the survey are asked to provide an e-mail address. This e-mail address will be used for contacting winners of the prize draw after the survey closed. Prize draw data is stored separately from survey data and cannot be connected to it.

2.3 Technical information

The web-tool used to collect responses to the survey was developed by IT experts at the Institute for Advanced Studies (IHS). With experience in large-scale data collection, this tool provides accessibility regarding both survey design and technical delivery and is compliant with Regulation 2018/1725 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, applicable since 25 May 2018.

Respondents access the survey via a publicly accessible link and no personal data are used to contact respondents. As a result, the Service Provider, in particular the research team from IHS responsible for the data analysis, has no access to any of the respondents' contact information and cannot link survey responses to personal contact information.

3. Who has access to your information and to whom is it disclosed?

Access to all information collected in the context of this survey is granted to members of the Service Provider Consortium as described in section 1.1, who have signed a corresponding data protection agreement, without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection tasks in accordance with EU legislation.

After completion of the project, a so-called Scientific Use File (SUF) will be created, which will be stored in a scientific data centre in the EU and will be accessible exclusively for scientific purposes. The SUF will not contain any data that allow direct or indirect conclusions about a person (e.g. metadata like the link referrer or the access code to the survey) or detailed analysis of individual higher education institutions (e.g. name of university).

No personal data is transmitted to parties which are outside the recipients and the legal framework mentioned.

The European Commission will not share your personal data with third parties for any purpose other than that stated in section 1-Purpose.

4. How do we protect and safeguard your information?

The collected personal data and all information related to the abovementioned survey are stored in the EU on a computer/server of the service provider, acting as processor, who must guarantee the data protection and confidentiality required by Regulation (EU) 2018/1725.

In order to protect your personal data, the Data Processor, which is bound by a specific contractual clause for any processing operations of your personal data on behalf of the European Commission, has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss,

alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

5. What rights do you have regarding the accession, modification or deletion of your information?

As a "data subject", you have the right to request access to, ratification, or erasure of your personal data, as well as to object to, or request the restriction of, the processing of your personal data. However, in the Western Balkans Tracer Study survey, no personal data can be related to the survey responses as it is accessible via a publicly available link and no personal data are used to contact respondents. As for the 'Data for prize draw' under section 2.2, you furthermore have the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal.

In case you wish to verify which survey data are stored, have them modified, corrected or deleted, the following procedure is in place:

- a) Before the survey responses are finally submitted or the survey is closed, the respondent is able to change answers until the specific date set as the end of the fieldwork.
- b) Once the respondent has submitted the responses or closed the survey, no further changes of survey responses are possible as the data is stored anonymized.
- c) Concerning data entered for the lottery, until the specific date set as the end of the fieldwork the respondent can send a request to the Service Provider in charge to have his or her data deleted.

You can exercise your rights by contacting the Service Provider (Data Processor) or, in case of conflict, the Data Controller (see Contact Information under section 7).

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

6. How long do we keep your contact details?

Contact details entered for the price draw (see 'Data for prize draw (optional)) are kept until the prize shipping is completely coordinated with the winners of the prize draw, but no longer than March 31st 2022. The Service Provider does not have access to any other contact information.

If you do not agree with this, please contact the Data Controller (see 7 Contact Information) and explicitly specify your request.

7. Contact Information

In case you have questions regarding the survey, or concerning any information processed in the context of the survey, or on your rights, feel free to contact the Service Provider's Research Team, who operates under the responsibility of the Data Controller, using the following contact information:

On behalf of the **Service Provider (Data Processor)**:

Institute for Advanced Studies
Higher Education Research Group
Josefstädter Strasse 39
1080 Vienna, Austria
GISurvey@ihs.ac.at

Data Controller:

European Commission
Directorate-General for Education, Youth, Sport and Culture
Directorate C: Innovation, International Cooperation and Sport
Unit C3: International Cooperation
70 Rue Joseph II
BE - 1049 Brussels, Belgium
EAC-UNITE-C3@ec.europa.eu

8. Recourse

1. The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller.

European Commission, DG EAC.C.3 at EAC-UNITE-C3@ec.europa.eu.

2. The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

3. The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.