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## Special Notice on Processing of Personal Data for CLUE - InCLUusive Erasmus+ tool

*Version of December 3, 2024*

### **Agency for Mobility and EU Programmes**

Frankopanska 26, Zagreb

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### **Data Protection Officer**

Contact: [privatnost@ampeu.hr](mailto:privatnost@ampeu.hr)

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## DEFINITIONS

For the purposes of the Special Notice on Processing of Personal Data for CLUE - InCLUusive Erasmus+ tool, the terms stated below will have the following meaning:

<b>Agency</b>	means Agency for Mobility and EU Programmes, Frankopanska 26, Zagreb, PIN (OIB): 25385906011;
<b>CLUE Tool Privacy Policy</b>	means this Special Notice on Processing of Personal Data for CLUE - InCLUusive Erasmus+ tool;
<b>CLUE Tool</b>	means a web-based tool designed for schools within the fields of school education (SCH) and vocational education and training (VET) seeking to strengthen their inclusive pedagogical practices through Erasmus+ projects, available at <a href="http://saltoinclusion.eu">saltoinclusion.eu</a> ;
<b>Data subject</b>	means a person whose personal data is processed, and whose identity identified or identifiable; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
<b>General Notice on Processing of Personal Data</b>	means the General Notice on Processing of Personal Data, available at <a href="https://www.ampeu.hr">https://www.ampeu.hr</a> ;
<b>General Regulation</b>	means regulation (EU) 2016/679 of the European Parliament and of the council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation);
<b>Personal data</b>	means any information relating to a data subject, on the basis of which it is possible to directly or indirectly identify an individual;



## 1. Introductory notes

- 1.1. This is the CLUE Tool Privacy Policy issued by the Agency and which contains information on processing of personal data of the data subjects in cases in which the Agency has the position of a controller of their personal data, in the context of use of the CLUE Tool.
- 1.2. The CLUE Tool Privacy Policy is considered as an additional notice on the processing of personal data referred to in Article 1.3 of the General Notice on Processing of Personal Data.
- 1.3. The General Notice on the Processing of Personal Data also applies to the processing of personal data when using the TCB tool, unless otherwise specified in CLUE Tool Privacy Policy.
- 1.4. This version of the CLUE Tool Privacy Policy applies from the date indicated therein.

## 2. Contact details of the data processor

- 2.1. When the Agency is in the position of the data controller, the data subjects can, in order to exercise their rights in connection with the processing of their personal data (section 17. of the General Notice on Processing of Personal Data) contact the data processor and data protection officer via email at the contact address indicated at the beginning of this CLUE Tool Privacy Policy.

## 3. CLUE Tool (data subjects, categories of data, purposes of processing personal data)

- 3.1. The Agency is processing personal data of persons using the CLUE Tool only if the entered email address can be considered as personal data due to information contained therein. If you entered a generic email address (e.g. info@XYZ.org), CLUE Tool does not process your personal data.
- 3.2. Data processed by CLUE Tool:
  - *email address*
  - *country*
  - *sector*
  - *role in your organization.*
- 3.3. The Agency is processing personal data of the data subjects concerned for the following purposes:
  - 3.3.1. To provide CLUES – recommendations designed to help improve implementation of the Erasmus+ programme, by sending results and recommendations to the email address you entered. In this case, legal basis for the processing of personal data is performance of the contract, i.e. terms of use of the CLUE Tool and providing the requested CLUES – recommendations.
  - 3.3.2. For the purpose of evaluating the efficiency and success of the CLUE Tool. For that purpose, we may send you a follow-up email asking your feedback on the CLUE Tool. In



this case, legal basis for the processing of personal data is the legitimate interest of the Agency as a National Agency hosting the SALTO resource center.

3.3.3. For the purpose of fulfilment of the rights of data subject (*e.g. when data subject requests to exercise the rights regarding their personal data*). In this case, legal basis for the processing of personal data is compliance with the legal obligations to which the Agency as a controller of data subject personal data is subject.

3.3.4. For the purposes of fulfilment other legal obligations to which the Agency is subject (*e.g. keeping data on activities conducted as national organizer or a coordinator, or a public entity subject to archiving regulations*). In this case, legal basis for the processing of personal data is compliance with the legal obligations to which the Agency is subject.

#### 4. Rights of the data subject and other relevant information

4.1. All information related to exercising rights under the General Regulation and all other information which we have to provide under the General Regulation is available in General Notice on Processing of Personal Data, especially Articles 12 – 17 thereof.

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Zagreb, December 3, 2024

DIRECTOR

Antonija Gladović, MSc

