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## Privacy Policy

Data protection is very important for us. We fully respect your right to privacy and actively seek to preserve the privacy rights of those who share information with us. The collection and processing of your personal data take place in compliance with the applicable data protection regulations, in particular the Basic Data Protection Regulation (GDPR).

The persons responsible (i.e., Joint Controllers) for the collection, processing, and use of your personal data through the use of the website in the sense of art. 26 of the GDPR are the partners who take part in the European Consortium related to the project “XENIA: HE Inclusiveness Index” (Erasmus+ Program - Key Action 3):

SInAPSi - University of Naples Federico II  
Corso Umberto I, 40 - 80138 Napoli  
Italy

University College Dublin, National University of Ireland (UCD)  
Belfield, Dublin 4  
Ireland

Universitat de Barcelona (UB)  
Gran Via de Les Corts Catalanes, 585 - 08007 Barcelona  
Spain

Hellenic Open University (HOU)  
Parodos Aristotelous 18, 26335 Patras  
Greece

Ozara Slovenija, Nacionalno združenje za kakovost življenja  
Ljubljanska ulica 9, 2000 Maribor  
Slovenia

Antinoo Arcigay di Napoli  
Vico S. Geronimo, 17, 80134 Napoli  
Italy

Internet Web Solutions SL (IWS)  
C/ Jalón, 31, Residencial Piscis Litoral II, Bloque 6, 5º A, Malaga  
Spain





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## **Why and how we collect and process the information and for how long we keep it?**

We collect your personal data in order to compute an Inclusiveness Index – namely, XENIA Inclusiveness Index - for each Higher Education Institution participating in the project “XENIA: HE Inclusiveness Index” (Erasmus+ Program - Key Action 3).

The legal basis of the processing of personal data collected is represented by the express consent to the processing of personal data referred to in art. 6, par. 1, lett. a) of the European Regulation 2016/679, through the voluntary act of access to the online questionnaire on the Xenia platform.

With regard to the special categories of personal data, the condition of the processing of these categories is represented by the explicit consent to the processing of personal data referred to in Art. 9, par. 2, let a) of the European Regulation 2016/679, through the voluntary act of marking a box in the online questionnaire on the Xenia Platform.

The data provided will be kept for the duration of the project plus two years, for a total of 5 years from 2020. They will be canceled in 2025. The only part required for statistical purposes by the University will be kept in aggregate form.

### **The types of Personal Data processed**

The personal data processed are those:

a) provided directly by the interested parties when filling out the online questionnaire in the Staff/Students section related to identification data (i.e., Department, biological sex, gender identity, university, profile [student/administrative/technical staff/faculty, sexual orientation). The provision of such personal data is voluntary and upon the subject’s explicit informed consent. These data will be kept separate from other information on the data subjects by reference to a code number. The key that allows the connection between the code and the common identifiers will be kept separately. All data will be processed in an aggregated manner.





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b) provided from time to time by the data subject when connecting and accessing the web application Xenia <https://xeniaindex.eu/xeniaindex.php> of the company Internet Web Solution SL.

When using the online platform, only strictly necessary cookies are collected.

The data provided will be processed by authorised staff within the University structures of competence and for institutional purposes, in line with the relevant laws and regulations. Institutions registered under the profile specialised personnel will have access to a private panel referring to their Institution and to their responses to the inclusiveness indicators proposed. They will be allowed to change their responses at any time. They will also have an overview of the scores obtained based on the answers of the staff/students section, but they will not see the answers.

#### **Who has access to the information and who do we share it with?**

In principle, we use your personal data only within our consortium. We will never share your data with any third parties.

#### **What are your rights?**

You have the following rights under Data Protection legislation.

##### 1. The right to be informed and to access information

You have the right to receive clear information about:

- a) Identity and contact details of the data controller;
- b) Contact details of the Data Protection Officer (person with responsibility for data protection matters within the organisation);
- c) Purpose(s) of the processing and the lawful basis for the processing;
- d) The retention period (how long an organisation holds onto data) or, if that is not possible, the criteria used to determine the retention period;
- e) Where processing is based on consent, the right to





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withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

- f) The right to lodge a complaint with a supervisory authority.

## 2. The right to erasure

This is also known as the 'right to be forgotten'. You have the right to have your data erased, without undue delay, if one of the following grounds applies:

- a) Where your personal data is no longer necessary in relation to the purpose for which it was collected or processed;
- b) Where you withdraw your consent to the processing and there is no other lawful basis for processing the data;
- c) Where you object to the processing and your personal data is being processed for direct marketing purposes;
- d) Where your personal data has been unlawfully processed;
- e) Where your personal data have to be erased in order to comply with a legal obligation.

If you have any concerns about your rights as a participant/student/employee, you can contact the Project Coordinator's Data Protection Office by email at:

rpd@unina.it; rpd@pec.unina.it

**Single Point of Contact for data sharing:** Annalisa Amodeo.

**E-mail:** amodeo@unina.it

If you are not satisfied or believe we are not processing your personal data in accordance with the law, you can complain to a supervisory authority, in particular in the Member State where you are staying, at your place of work, or at the place where the alleged infringement occurred.

