

## ANNEX D

### COMPLETE PRIVACY NOTICE

#### UA\_EU\_CLUSTER5.0 Partnership Brokers Selection

**Effective Date:** [To be inserted upon publication]

**Version:** 1.0

**Language:** English

---

### 1. INTRODUCTION

This Privacy Notice explains how we collect, use, store, and protect your personal information when you apply for the Partnership Brokers selection within the UA\_EU\_CLUSTER5.0 project. This notice is provided in accordance with the General Data Protection Regulation (EU) 2016/679 (GDPR) and applicable national data protection legislation.

We are committed to protecting your privacy and handling your personal data in accordance with the highest standards of data protection. This notice describes your data protection rights and how the law protects you.

---

### 2. DATA CONTROLLER

#### 2.1 IDENTITY AND CONTACT DETAILS

**Data Controller:** X23 Srl - The Innovation Bakery

**Legal Form:** Limited Liability Company (Società a Responsabilità Limitata)

**Registration:** MI - 2099321

**Registered Office:** via Sant'Elisabetta, 5 - Bergamo

**Tax Identification Number:** IT11372301009

**Primary Contact for Data Protection Matters:**

**Email:** info@x-23.org

**Postal Address:** via Sant'Elisabetta, 5 - Bergamo

**Telephone:** +39 035 086 9220

#### 2.2 DATA PROTECTION OFFICER

**Name:** Giuseppe Laquidara

**Email:** GO@x-23.org

**Postal Address:** [via Sant'Elisabetta, 5 - Bergamo  
**Telephone:** +39 035 086 9220

You have the right to contact our Data Protection Officer directly regarding any questions or concerns about our processing of your personal data.

---

### 3. CATEGORIES OF PERSONAL DATA COLLECTED

We collect and process the following categories of personal data about you:

**3.1 IDENTITY DATA** - Full name, preferred title, date of birth - Nationality and tax identification numbers - Professional status and business registration details - Copy of identity document

**3.2 CONTACT DATA** - Postal addresses (registered and correspondence) - Telephone numbers (primary and mobile) - Email addresses (including certified email) - Emergency contact information (where provided)

**3.3 PROFESSIONAL DATA** - Employment history and professional experience - Educational qualifications and certifications - Professional memberships and affiliations - Language competencies and certifications - Technical skills and specialist expertise

**3.4 PROJECT-SPECIFIC DATA** - Partnership development project details - Professional references and contact authorisations - Motivational statements and application responses - Availability and travel preferences - Track preferences (SMAU or SIM)

**3.5 FINANCIAL DATA** - Bank account details (for successful applicants only) - Tax status and VAT registration numbers - Professional insurance details

**3.6 SPECIAL CATEGORIES OF DATA** - Accessibility requirements (where disclosed) - Health-related information relevant to project participation (voluntary disclosure only)

**3.7 TECHNICAL DATA** - IP address and device information - Application submission timestamps - Platform usage analytics (where consent provided)

---

### 4. SOURCES OF PERSONAL DATA

**4.1 DIRECTLY FROM YOU** The majority of your personal data is collected directly from you through: - Completion of the application form - Submission of supporting documentation - Email communications - Telephone conversations - Video conference interviews (if applicable)

**4.2 FROM THIRD PARTIES** We may receive personal data about you from: - Professional references (with your consent) - Verification services for qualification checking - Public

registers for business verification - Consortium partners (where you have existing relationships)

**4.3 PUBLICLY AVAILABLE SOURCES** Limited information may be obtained from: - Professional networking platforms (LinkedIn, industry directories) - Company websites and public business registrations - Published professional materials and articles

---

## 5. PURPOSES AND LEGAL BASIS FOR PROCESSING

### 5.1 PURPOSES OF PROCESSING

We process your personal data for the following purposes:

- a) Selection Process Management** - Application processing and evaluation - Candidate screening and shortlisting - Communication regarding selection status - Reference verification and background checks
- b) Contract Administration** - Contract preparation and execution - Performance monitoring and evaluation - Payment processing and financial administration - Compliance with contractual obligations
- c) Project Implementation** - SME assignment and coordination - Event participation coordination - Performance tracking and reporting - Knowledge sharing and best practice development
- d) Legal and Regulatory Compliance** - EU audit and reporting requirements - Tax and employment law compliance - Anti-money laundering checks - Health and safety obligations
- e) Communication and Engagement** - Project updates and notifications - Alumni network participation (with consent) - Future opportunity notifications (with consent) - Promotional activities (with specific consent)

### 5.2 LEGAL BASIS FOR PROCESSING

The legal basis for processing your personal data depends on the purpose:

- a) Contractual Necessity** (Article 6(1)(b) GDPR) - Processing necessary for contract performance - Pre-contractual activities and selection process - Payment processing and administration
- b) Legal Obligation** (Article 6(1)(c) GDPR) - EU audit and reporting requirements - Tax and employment compliance - Anti-fraud and security measures

**c) Legitimate Interests** (Article 6(1)(f) GDPR) - Project quality assurance and performance monitoring - Business relationship management - Future opportunity matching - Operational efficiency and improvement

**d) Consent** (Article 6(1)(a) GDPR) - Marketing communications - Alumni network participation - Promotional material usage - Optional platform analytics

### 5.3 SPECIAL CATEGORIES OF DATA

Where we process special categories of personal data (such as accessibility requirements), we rely on: - Explicit consent (Article 9(2)(a) GDPR) - Necessity for compliance with employment obligations (Article 9(2)(b) GDPR)

---

## 6. RECIPIENTS OF PERSONAL DATA

### 6.1 INTERNAL RECIPIENTS

Your personal data may be shared within the project consortium: - X23 Srl - The Innovation Bakery (Data Controller) - Madan Parque Science and Technology Park - ICI Cluster - Chernihiv IT Cluster - AFIL - Associação para a Formação, Investigação e Lazer - University of Bergamo

### 6.2 EXTERNAL RECIPIENTS

We may share your personal data with:

**a) Evaluation Commission Members** - External experts participating in candidate evaluation - Subject to confidentiality agreements and data protection obligations

**b) Professional Service Providers** - IT service providers and platform operators - Payment processing services - Professional verification services - Legal and financial advisors

**c) Regulatory and Government Bodies** - European Commission (for audit and reporting purposes) - National tax authorities - Regulatory bodies as required by law

**d) SME Partners** (for successful applicants only) - Contact details for collaboration purposes - Professional background relevant to partnership facilitation

### 6.3 SAFEGUARDS FOR RECIPIENTS

All recipients are bound by: - Data processing agreements compliant with GDPR - Confidentiality obligations - Technical and organisational security measures - Regular compliance monitoring and auditing

---

## 7. INTERNATIONAL TRANSFERS

### 7.1 TRANSFERS WITHIN THE EEA

Personal data is primarily processed within the European Economic Area (EEA) through our consortium partners in Italy, Portugal, and project activities extending to Ukraine.

### 7.2 TRANSFERS OUTSIDE THE EEA

Where personal data is transferred outside the EEA:

- a) To Ukraine** - Transfers necessary for contract performance with Ukrainian SMEs - Appropriate safeguards through standard contractual clauses - Additional security measures for sensitive data
- b) To Third Countries** - Limited transfers only with adequate protection measures - Standard Contractual Clauses (SCCs) or adequacy decisions - Prior assessment of transfer necessity and proportionality

### 7.3 SAFEGUARDS FOR INTERNATIONAL TRANSFERS

All international transfers are protected by: - European Commission standard contractual clauses - Technical encryption and security measures - Regular monitoring of protection adequacy - Data minimisation principles

---

## 8. RETENTION PERIODS

### 8.1 RETENTION POLICY

We retain personal data for the minimum period necessary to fulfil the purposes for which it was collected:

- a) Successful Applicants** - Duration of contract plus five (5) years - EU audit requirements mandate five-year retention post-project completion - Financial data retained for seven (7) years for tax compliance
- b) Unsuccessful Applicants** - Two (2) years from selection conclusion - Reserve list data until 31st December 2025 - Limited contact data with consent for future opportunities
- c) Reference Data** - Retained only for verification period - Deleted within six (6) months of selection completion - Unless explicit consent provided for future contact

### 8.2 RETENTION CRITERIA

Retention periods are determined by: - Contractual obligations and performance requirements - Legal and regulatory compliance requirements - Legitimate business

interests in relationship maintenance - Data subject consent for optional retention purposes

### 8.3 SECURE DELETION

Upon expiry of retention periods: - Secure deletion using industry-standard methods - Verification of complete data removal - Certificates of destruction where appropriate - Regular auditing of deletion procedures

---

## 9. YOUR DATA PROTECTION RIGHTS

### 9.1 OVERVIEW OF RIGHTS

Under GDPR, you have the following rights regarding your personal data:

- a) Right of Access** (Article 15 GDPR) - Obtain confirmation whether we process your personal data - Access to your personal data and processing information - Free copy of personal data (additional copies may incur reasonable fees)
- b) Right to Rectification** (Article 16 GDPR) - Correction of inaccurate personal data - Completion of incomplete personal data - Prompt notification to relevant third parties
- c) Right to Erasure** (Article 17 GDPR) - Deletion of personal data in specific circumstances - Subject to legal obligations and legitimate interests - Notification to third parties where technically feasible
- d) Right to Restrict Processing** (Article 18 GDPR) - Limitation of processing in certain circumstances - Notification before lifting restrictions - Continued storage with limited processing
- e) Right to Data Portability** (Article 20 GDPR) - Receive personal data in structured, machine-readable format - Transmit data to another controller where technically feasible - Direct transmission where possible
- f) Right to Object** (Article 21 GDPR) - Object to processing based on legitimate interests - Object to direct marketing at any time - Object to processing for scientific/historical research
- g) Rights Related to Automated Decision-Making** (Article 22 GDPR) - Right not to be subject to solely automated decision-making - Right to human intervention in automated processes - Right to challenge automated decisions

### 9.2 EXERCISING YOUR RIGHTS

To exercise your data protection rights:

**Contact Methods:** - Email: [privacy@x-23.org](mailto:privacy@x-23.org) - Post: [Address to be inserted] - Online form: [To be provided if available]

**Response Timeframes:** - Standard response: within one (1) month - Complex requests: up to three (3) months with explanation - Emergency situations: immediate response where feasible

**Identity Verification:** - Verification may be required to prevent unauthorised access - Additional information may be requested for complex requests - Proportionate verification measures applied

### 9.3 LIMITATIONS ON RIGHTS

Your rights may be limited where: - Processing is necessary for compliance with legal obligations - Processing is in the public interest or exercise of official authority - Processing is necessary for establishment, exercise, or defence of legal claims - Restriction would prejudice EU audit and oversight requirements

---

## 10. CONSENT MANAGEMENT

### 10.1 CONSENT-BASED PROCESSING

Where we rely on consent for processing:

**a) Characteristics of Valid Consent** - Freely given, specific, informed, and unambiguous - Clear affirmative action required - Granular consent options provided - Easy withdrawal mechanisms available

**b) Consent Withdrawal** - Right to withdraw consent at any time - Withdrawal does not affect lawfulness of prior processing - Easy withdrawal through same channels used for giving consent - No disadvantage for withdrawing consent

### 10.2 CONSENT RECORDS

We maintain records of: - When and how consent was obtained - Information provided at time of consent - Withdrawal of consent and effective dates - Regular review of consent validity

---

## 11. DATA SECURITY

### 11.1 TECHNICAL MEASURES

We implement appropriate technical measures including:

**a) Encryption** - Data encryption in transit and at rest - Industry-standard encryption protocols - Regular security protocol updates - Encrypted backup and recovery systems

**b) Access Controls** - Role-based access permissions - Multi-factor authentication requirements - Regular access review and updates - Automated access logging and monitoring

**c) Network Security** - Firewall protection and intrusion detection - Regular security vulnerability assessments - Secure communication channels - Isolated data processing environments

## **11.2 ORGANISATIONAL MEASURES**

We implement appropriate organisational measures including:

**a) Staff Training and Awareness** - Regular data protection training programmes - Confidentiality agreements for all staff - Clear data handling procedures and policies - Incident response training and protocols

**b) Data Processing Governance** - Data protection impact assessments - Regular compliance auditing and monitoring - Documented data processing procedures - Senior management accountability frameworks

**c) Third Party Management** - Due diligence on data processors - Contractual data protection obligations - Regular monitoring of compliance - Incident notification requirements

## **11.3 DATA BREACH PROCEDURES**

In the event of a data breach: - Assessment and containment within 24 hours - Notification to supervisory authority within 72 hours (where required) - Communication to affected individuals without undue delay (where required) - Documentation and post-incident review procedures

---

## **12. COMPLAINTS AND SUPERVISION**

### **12.1 INTERNAL COMPLAINTS**

If you have concerns about our data processing:

**First Contact:** [info@x-23.org](mailto:info@x-23.org)

**Escalation:** [privacy@x-23.org](mailto:privacy@x-23.org)

**Final Appeal:** Project Coordinator

**Response Process:** - Acknowledgement within 5 working days - Investigation and response within 30 days - Escalation procedures for unresolved complaints



## 12.2 SUPERVISORY AUTHORITY

You have the right to lodge a complaint with the relevant supervisory authority:

**Italy** (Lead Supervisory Authority):

Garante per la protezione dei dati personali

Website: [www.gpdp.it](http://www.gpdp.it)

Email: [garante@gpdp.it](mailto:garante@gpdp.it)

Telephone: +39 06 69677 1

**Other Relevant Authorities:** - Portugal: Comissão Nacional de Proteção de Dados (CNPd) -  
Ukraine: Commissioner for Human Rights of the Verkhovna Rada - Your local supervisory  
authority (if different)

## 12.3 JUDICIAL REMEDIES

You also have the right to seek judicial remedies if you believe your data protection rights  
have been infringed.

---

# 13. AUTOMATED DECISION-MAKING

## 13.1 AUTOMATED PROCESSING

Our selection process includes some automated elements:

**a) Application Screening** - Automated completeness checking - Basic eligibility  
verification - Duplicate application detection

**b) Scoring Components** - Mathematical calculation of scores - Ranking and shortlist  
generation - Performance monitoring during engagement

## 13.2 HUMAN OVERSIGHT

All significant decisions involve human review: - Final selection decisions made by  
Evaluation Commission - Human verification of automated assessments - Right to request  
review of automated elements - Appeals process for all selection decisions

## 13.3 PROFILING ACTIVITIES

Limited profiling may occur for: - Matching candidates to suitable tracks - Performance  
prediction and support needs - Alumni network engagement optimisation

You have the right to object to profiling and request human intervention in any automated  
decision-making process.

---

## **14. UPDATES TO THIS NOTICE**

### **14.1 NOTICE UPDATES**

This Privacy Notice may be updated to reflect: - Changes in data processing activities - Legal or regulatory requirements - Technological developments - Best practice improvements

### **14.2 NOTIFICATION OF CHANGES**

We will notify you of significant changes through: - Email notification to applicants - Website publication with change tracking - Direct communication for material changes affecting your rights

### **14.3 VERSION CONTROL**

All versions of this notice are maintained with: - Version numbers and effective dates - Summary of changes made - Historical versions available upon request

---

## **15. ADDITIONAL INFORMATION**

### **15.1 DATA PROTECTION IMPACT ASSESSMENT**

A Data Protection Impact Assessment has been conducted for this project, evaluating: - Necessity and proportionality of processing - Risk assessment and mitigation measures - Consultation with data protection authorities - Ongoing monitoring and review procedures

### **15.2 CHILDREN'S DATA**

This selection process is intended for professional adults. We do not knowingly collect personal data from individuals under 18 years of age.

### **15.3 MARKETING AND COMMUNICATIONS**

Marketing communications are sent only with explicit consent and include: - Clear identification of communication purpose - Easy unsubscribe mechanisms - Respect for communication preferences - Separation from operational communications

---

## **16. CONTACT INFORMATION**

### **16.1 DATA PROTECTION ENQUIRIES**

**Primary Contact:** [privacy@x-23.org](mailto:privacy@x-23.org)

**Response Time:** 5 working days for acknowledgement

## 16.2 GENERAL PROJECT ENQUIRIES

**Primary Contact:** info@x-23.org

**Website:** www.ua-eu-cluster-partnership.eu

**Response Time:** 2 working days

## 16.3 EMERGENCY CONTACT

For urgent data protection matters: **Emergency Email:** GO@x-23.org

**Telephone:** +39 035 086 9220

---

## 17. ACKNOWLEDGEMENT AND CONSENT

By submitting your application, you acknowledge that:

1. You have read and understood this Privacy Notice
2. You consent to the processing described for selection purposes
3. You understand your rights and how to exercise them
4. You have provided accurate and complete information

**Optional Consents** (to be selected in application form): ☐ I consent to receiving information about future opportunities

☐ I consent to participating in alumni network activities

☐ I consent to my professional achievements being used in promotional materials

☐ I consent to enhanced platform analytics for service improvement

---

### Document Information:

**Document Reference:** UA\_EU\_CLUSTER5.0/PRIVACY/V1.0

**Approval Date:** November 25, 2025

**Review Date:** November 25, 2026

---

*This Privacy Notice is issued within the framework of the UA\_EU\_CLUSTER5.0 project, co-funded by the European Union under Grant Agreement No. 101195937. All data processing activities comply with GDPR and applicable national data protection legislation.*

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Innovation Council and SMEs Executive Agency (EISMEA). Neither the European Union nor EISMEA can be held responsible for them.