

PRIVACY NOTICE – TEAM-COACH TRAINING PROGRAMME
article 13 Regulation (EU) 2016/679
“General Data Protection Regulation”

Pursuant to article 13 and 14 of the Regulation (EU) 2016/679 General Data Protection Regulation (hereinafter the “**GDPR**”), **Fondazione Penta ETS**, an organization incorporated in Italy (Fiscal Code 92166930286) with registered office in Padova, Corso Stati Uniti, 4, Italy, email info@penta-id.org (hereinafter “**Penta**” or “**Joint Controller**”) and **Fundación Biomédica del Hospital Universitario 12 Octubre**, an organization incorporated in Spain (VAT number ESG83727016) with registered office at Avda. de Córdoba s/n, 28041 Madrid, Spain, email teamcoach.eu@gmail.com (hereinafter “**FIB120**” or the “**Joint Controller**”), in their capacity as “**Joint Controllers**”, provide the following information on the processing of the Personal Data of the User(s) (i.e. the healthcare professionals, hospital cleaning personnel and faculties members) of the Team-COACH virtual learning environment which gather training courses within the Team-COACH project called “Training and capacity building in antimicrobial stewardship and infection prevention and control in children through an interactive electronic tool and a European collaborative group” (hereinafter “**Team-COACH Training Programme**”).

The data processing will be carried out in compliance with GDPR.

a) Joint Data Controllers:

Penta and FIB120 are the Joint Controllers.

b) Data Protection Officer (DPO):

Each Joint Controller has appointed a Data Protection Officer pursuant to Article 37 of the GDPR who may be contacted at the following e-mail addresses:

- for Penta: dpo@pentafoundation.org
- for FIB20: dpo.fib120octubre@alvaroavant.com

c) Purposes and legal basis of the processing

The Users’ personal data (e.g. name, surname, username, e-mail address, place of work, profession) (“**Personal Data**”) are processed by the Joint Controllers, according to the GDPR, for the following purposes:

1) manage the registration and participation to the Team-COACH Training Programme: Penta will manage the User’s personal data to register him/her to the Team-COACH virtual learning environment to allow him/her to attend the training courses hosted therein, to let him/her to participate in the community and to offer technical support when requested. The personal data collected for this purpose are the username, the name (only for technical support), the surname (only for technical support), the e-mail address (only for technical support), the place of work and the profession. The legal basis of such data processing is the performance of a service requested by the data subject (Art. 6(1)(b) of the GDPR).

2) provision of ECME credits: the Joint Controllers will manage the provision of the ECME credits if needed and requested by the User. The personal data collected for this purpose are the username, the name, the surname, the e-mail address, the place of work and the profession. The legal basis of such data processing is the performance of a service requested by the data subject (Art. 6(1)(b) of the GDPR).

3) (only for training leaders) manage the participation to the questionnaires: Penta will manage the training leader’s personal data to allow them to answer to the questionnaires and to analyze the results collected. The personal data collected for this purpose are the username, the place of work and the profession. The legal basis for such data processing is the consent of the data subject (Art. 6(1)(a) of the GDPR). We specify that any reports that may be produced, transferred, or disseminated by the Joint Controllers on the results of the questionnaires will contain only aggregate data, with no participant identification data.

If the User refuse to give us the consent this does not have any consequences regarding the possibility of participating to the Team-Coach Training Programme, but it will not be possible to fill out the questionnaire. The consent can be freely withdrawn by sending an e-mail to info@penta-id.org or to teamcoach.eu@gmail.com. Withdrawing consent shall not affect the lawfulness of the processing based on consent before its withdrawal.

d) Means of the processing

Users’ Personal Data will be processed and stored both in electronic and paper form in compliance with the legislation in force and, in any case, in a way that ensures their safety, confidentiality and prevents unauthorized dissemination or use, falsification or destruction.

e) Data storage period

The Personal Data collected and processed for the purposes c) n.1 and n.2 will be stored for a maximum period of 3 (three) years from the official end of the Team-COACH project, including any extension thereof, and in compliance with relevant legal obligation.

The Personal Data collected and processed for the purposes c) n.3 will be stored until User's consent withdrawal and in any case no longer of a maximum period of 3 (three) years from the official end of the Team-COACH project, including any extension thereof, and in compliance with relevant legal obligation.

In any case, the data will be kept to comply with regulatory obligations and pursue the aforementioned purposes, in accordance with the principles of necessity, minimization and adequacy.

After the aforementioned periods, the Personal Data will be cancelled or destroyed.

f) Processing recipients

For the above purposes, Users' Personal Data may come to knowledge of personnel expressly authorized by each Joint Controller for their respective areas of competence (pursuant to art. 29 GDPR) and may also be known to the following third parties: (i) companies entrusted with the management of the website, electronic archives and IT systems; (ii) companies and/or professionals entrusted with graphic design, layout, etc. Where necessary, the Joint Controllers have appointed such processing recipients as Data processor pursuant art. 28 GDPR. A list of all the Data processor designated can be required by notice to be sent to info@penta-id.org or to teamcoach.eu@gmail.com.

g) Transmission of data outside the European Union

Within the purposes listed above, Personal Data might be processed in countries not belonging to the European Union ("Third Countries"), such as Philippines. In the case of a transfer of Personal Data outside the European Union, the Joint Controllers undertake to comply with Chapter V of the GDPR on the transfer of data to Third Countries. The transfer of data shall be based on an adequacy decision of the European Commission (according to art. 45 of the GDPR) or on an appropriate safeguard (according to art. 46 of the GDPR). By simple request to be made to the e-mail address info@penta-id.org or toteamcoach.eu@gmail.com, the User will be able to receive specific information on processor which process data outside the European Union.

h) Data subject's rights

By notice to be sent, with respect to each Joint Controllers, to the e-mail address info@penta-id.org or teamcoach.eu@gmail.com. Users may at any time exercise the rights provided for by articles 15 to 22 of the GDPR, such as:

- *obtaining confirmation as to whether or not personal data concerning you is being processed;*
- *obtaining access to your personal data and to the information set out in Article 15 of the GDPR;*
- *obtaining the rectification of the inaccurate personal data that concern you without undue delay or the supplementing of incomplete personal data;*
- *obtaining the erasure of the personal data that concern you without undue delay;*
- *obtaining the restriction of processing the personal data that concern you;*
- *being informed of any rectifications or erasures or restrictions of processing in relation to the personal data that concern you;*
- *receiving in a structured, commonly used and machine-readable format the personal data that concern you;*
- *objecting at any time, on grounds associated with your specific situation, to the processing of the personal data that concern you.*

You can find the full list of your rights on www.garanteprivacy.it and/or on the website of the local Data Protection Supervisory Authority.

i) Complaint to the Data Protection Authority

We remind the User that, should he/she consider the processing of his/her Personal Data infringes the GDPR, he/she may in any event lodge a complaint before the Italian Data Protection Supervisory Authority, the Spanish Data Protection Supervisory Authority or to the Data Protection Supervisory Authority of the Member State of your habitual residence, place of work or place of the alleged infringement.

Fondazione Penta ETS

Fundación Biomédica del Hospital Universitario 12 Octubre