



Privacy Notice

This privacy notice explains how we use the personal data collected from you when you apply for the European Qualifications Passport for Refugees (EQPR).

Who are we?

The Council of Europe administers the process of issue of the EQPR. It is the “data controller” with respect to your personal data, which means it has the decision-making power concerning the data processing.

CIMEA is the official Italian centre within the European Network of Information Centres in the European Region (ENIC) and the National Academic Recognition Information Centres in the European Union (NARIC) based in Rome, Italy. It has developed the EQPR IT platform used to process applications for the EQPR, to issue the EQPR in digital format and to allow EQPR holders to securely store his/her EQPR and securely share it with whomever the EQPR holder wants to share his/her EQPR. With regard to the processing of your personal data, CIMEA is the “data processor”, which means it processes personal data on behalf of the Council of Europe.

What data do we collect?

1. We collect the personal data necessary to process your application for the EQPR. This includes information submitted by you in response to the EQPR questionnaire, such as your name, your parents' names, date and place of birth, gender, nationality, refugee status, information about your education and skills. In addition to your responses to the questionnaire, we may collect your personal data from the supporting documents that you submit, which includes your identification documents and documents related to your education, as well as during an interview with you.

2. We also collect data necessary for the functioning of the IT platform used to process applications for the EQPR. In order to register with the IT platform you will have to create a login with your e-mail address and your password.

Should you contact the Council of Europe for technical support, we may ask you to provide certain personal data for authentication purposes.

For the duration of your session, we store login information in your browser's local storage. It is deleted upon the expiry of your session. We also record time and date of creation and updates of the documents you have submitted and of access to the data so as to trace any possible misuse.

We do not collect information either about your IP address or the computer and technology you use. We do not install cookies on your computer either.

How do we use your personal data?

The Council of Europe will use the information collected for the exclusive purpose of processing your application for the EQPR.



CIMEA may also process your personal data for authentication purposes when you use the EQPR platform.

If you get invited to an online interview, the processing of your personal data for purposes other than those stated above (for example, in order for you to be able to use the online web-conferencing tool) will be explained in the Privacy Notice of the provider of the online service.

After the issue of the EQPR we may use your contact details to ask for your feedback on whether you found the EQPR useful. While we encourage you to provide us with feedback, you are under no obligation to do so.

Your rights and control of your personal data

Your personal data will be stored in your User's Wallet on the EQPR platform. You are the only one who can correct, update or delete it, thereby exercising your rights to access your personal data, correct incomplete or inaccurate data, delete or remove your personal information and object to the processing of your personal data.

All data saved within your User's Wallet can be exported in standardized format allowing you to exercise your right to portability of such data to any other system or service. The data structure follows the open-standard and language-independent JSON format compatible with any modern IT system.

If you notice inaccurate information in your EQPR, you have seven days from the date of its issue to bring this to our attention so that we could rectify it.

Data storage

Prior to the issue of the EQPR the personal data that you submitted in the EQPR questionnaire and the supporting documents will be stored on CIMEA's data servers in Germany. It will be stored until six months after the issue of the EQPR, unless you choose to delete it sooner.

After the EQPR is issued, your personal data contained in the EQPR will be stored on multiple servers within the European Union (EU) using blockchain technology (see more on this technology in relation to Data security below). Your EQPR will be stored in your User's Wallet until you decide to delete it.

Data sharing and transfer

Apart from you, your personal data may be accessed by the Council of Europe's team in charge of administering the processing of applications for the EQPR as well as by two evaluators and one evaluation coordinator from the partnering ENIC-NARIC centres.

Otherwise, the Council of Europe and CIMEA will not disclose your personal data to third parties without your consent unless under a duty to disclose or share your personal data in order to comply with a legal obligation or to protect your security or security of other persons. Should such situation arise, we will seek to share the minimum amount of information necessary. In this case we will make reasonable efforts to inform you beforehand of the disclosure of your personal data unless we are specifically precluded from doing so by the applicable provisions on confidentiality, for example, in relation to an ongoing criminal investigation.



We will not transfer your personal data to servers in locations outside of the EU.

Once your EQPR is issued, you can share it anytime, anywhere and with anyone you choose.

Data security

The Council of Europe and CIMEA have put in place measures to protect the security of your information, including appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

In particular, data you provide to us is protected by encryption. Only you have access to the data in your User's Wallet's through cryptographic keys.

Furthermore, the EQPR platform is based on blockchain technology which provides decentralised storage of your personal data within the chain, which makes it immutable or tamper resistant (that is secure from unauthorised access, misuse, deterioration or destruction).

Legal basis for processing your data

While the Council of Europe does not charge for the issue of EQPR, submission of an application for the EQPR amounts to a request for service under the contract between you and the Council of Europe. We process your personal data on the basis of this contract.

Contacts

For any queries, concerns or requests you may have in connection with the way your data is collected and used, please contact the Council of Europe by:

- sending an email to refugees.qualifications@coe.int
- sending a request by post to European Qualifications Passport for refugees Project, Education department, Capacity Building and Co-operation Division / Council of Europe / F-67075 Strasbourg Cedex
- sending an email to the Council of Europe's Data Protection Officer at dpo@coe.int.