



Q-HELIX ALLIANCE  
NAWA Programme “Support for European Universities”  
Project No. BPI/WUE/2025/1/00016  
“Support for the European University Alliance Q-Helix – Inclusive European University  
Based on the Quintuple Helix Model”

**ANNEX NO. 12**

**INFORMATION CLAUSE ON THE  
PROCESSING OF PERSONAL DATA  
FOR PARTICIPANTS OF Q-HELIX  
RESEARCH MOBILITIES**

Dąbrowa Górnicza, Poland

12 June 2026

This document has been prepared within the project “Support for the European University Alliance Q-Helix – Inclusive European University Based on the Quintuple Helix Model”, implemented by WSB University under the NAWA Programme “Support for European Universities”. The project is financed by the European Union under the European Funds for Social Development 2021–2027 Programme.

## **INFORMATION OBLIGATION REGARDING THE PROCESSING OF PERSONAL DATA BY WSB UNIVERSITY**

Pursuant to Article 13 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as the “GDPR”), we hereby inform you that:

### **1. Data Controller**

The controller of your personal data is:

#### **WSB University**

ul. Cieplaka 1C

41-300 Dąbrowa Górnicza

Poland

E-mail: [rektorat@wsb.edu.pl](mailto:rektorat@wsb.edu.pl)

Telephone: +48 32 262 28 05

### **2. Data Protection Officer**

The Controller has appointed a Data Protection Officer who may be contacted by e-mail at:

[iod@wsb.edu.pl](mailto:iod@wsb.edu.pl)

or by telephone:

**+48 32 111 01 80**

### **3. Purpose and Legal Basis of Processing**

Your personal data shall be processed:

- a) pursuant to Article 6(1)(f) GDPR for the purpose of receiving applications and organising researcher mobility, including organisational communication, providing organisational information, assessment of applications, communication of recruitment results, transfer of data to the host institution and verification of researcher status with the sending institution;
- b) pursuant to Article 6(1)(f) GDPR for the purpose of preparing photographic documentation of events in connection with the implementation of the agreement concluded with the Polish National Agency for Academic Exchange (NAWA), including documentation of substantive

activities and support measures, as well as promotional activities related to such support measures;

c) pursuant to Article 6(1)(f) GDPR for the purpose of establishing, pursuing or defending potential legal claims.

#### **4. Recipients of Personal Data**

Your personal data may be disclosed to:

a) entities cooperating with WSB University and processing personal data under data processing agreements concluded in accordance with Article 28(3) GDPR;

b) university employees or persons engaged by the Controller under civil law contracts who have been authorised by the Controller to process personal data pursuant to Article 29 GDPR;

c) public authorities and entities acting on the basis of and for the purposes specified in generally applicable legal provisions, in particular:

- the Minister responsible for regional development,
- the Polish National Agency for Academic Exchange (NAWA),
- the National Centre for Research and Development (NCBR),

and in connection with the implementation of the Project agreement referred to in point 3, provided that the above-mentioned institutions act as separate controllers of your personal data;

d) the host institution and the researcher's sending institution.

#### **5. Data Retention Period**

Personal data processed pursuant to Article 6(1)(f) GDPR shall be stored for the period necessary due to the obligation to retain documentation related to the proper implementation of the Project agreement referred to in point 3, that is, for a period of not less than five years from the date of completion, termination or expiry of the agreement.

#### **6. Provision of Data**

Providing personal data for the purpose of organising mobility is voluntary, but necessary for the proper conduct of the procedure. Failure to provide such data shall make participation in the procedure impossible.

### **7. Automated Decision-Making**

The personal data provided by you shall not be subject to automated processing and shall not form the basis for automated decision-making, including profiling.

### **8. Transfers to Third Countries**

In connection with the organisation of mobility activities, the Controller may transfer personal data to a third country (Ukraine or Kosovo) where mobility is implemented at a partner institution located in one of the above-mentioned countries.

### **9. Rights of the Data Subject**

In connection with the processing of your personal data by the Controller, you are entitled to:

- a) request access to your personal data – Article 15 GDPR;
- b) request rectification of personal data – Article 16 GDPR;
- c) request erasure of personal data – Article 17 GDPR;
- d) request restriction of processing – Article 18 GDPR;
- e) object to the processing of personal data – Article 21 GDPR;
- f) withdraw consent to the processing of personal data at any time where processing is based on Article 6(1)(a) GDPR. Withdrawal of consent shall not affect the lawfulness of processing carried out before its withdrawal;
- g) lodge a complaint with the supervisory authority responsible for personal data protection, namely the President of the Personal Data Protection Office (UODO), ul. Stanisława Moniuszki 1A, 00-014 Warsaw, Poland, e-mail: [kancelaria@uodo.gov.pl](mailto:kancelaria@uodo.gov.pl), in accordance with Article 77 GDPR.

**INFORMATION CLAUSE OF THE INTERMEDIATE BODY –  
NATIONAL CENTRE FOR RESEARCH AND DEVELOPMENT (NCBR)**

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as the “GDPR”), we hereby inform you that:

**1. Data Controller**

The controller of your personal data is the **National Centre for Research and Development (NCBR)**, with its registered office in Warsaw (00-801), ul. Chmielna 69, Poland.

**2. Data Protection Officer**

The Data Protection Officer may be contacted at:

[iod@ncbr.gov.pl](mailto:iod@ncbr.gov.pl)

or by correspondence sent to the above-mentioned NCBR address with the note:

**“Data Protection Officer”.**

**3. Purpose of Processing**

Personal data are processed for the implementation of projects carried out under the **European Funds for Social Development 2021–2027 Programme (FERS)**, in particular for:

- project evaluation and selection;
- conclusion of grant agreements;
- supervision of project implementation;
- reporting;
- communication;
- publication;
- evaluation;
- financial management;
- verification and control;
- audits;
- assessment of information and promotional activities;
- project acceptance;

- financial settlement;
- determination of participant eligibility;
- establishment, pursuit or defence of legal claims.

#### **4. Legal Basis for Processing**

Personal data are processed because such processing is necessary for the performance of a task carried out in the public interest (Article 6(1)(e) GDPR).

NCBR is authorised to process personal data pursuant to:

- the Act of 30 April 2010 on the National Centre for Research and Development;
- the Act of 28 April 2022 on the principles of implementing tasks financed from European funds under the financial perspective 2021–2027, in particular Chapter 18 thereof;

and therefore also on the basis of Article 6(1)(c) GDPR.

#### **5. Source of Personal Data**

Personal data have been obtained directly from the data subject, from public registers, or from institutions and entities involved in project implementation, including in particular applicants, beneficiaries and project partners.

#### **6. Scope of Data Processed**

NCBR processes personal data contained in grant applications or provided during the implementation of activities referred to in point 3 of this clause.

#### **7. Obligation to Provide Data**

Provision of personal data is necessary for the implementation of the above-mentioned purposes.

Refusal to provide personal data shall result in the impossibility of undertaking the relevant actions.

#### **8. Data Retention Period**

Personal data shall be processed for the period necessary to achieve the purposes specified in point 3 and subsequently for archival purposes in accordance with the NCBR records management instructions and the Unified File Classification System.

## **9. Recipients of Personal Data**

Recipients of personal data may include:

- public authorities;
- entities performing public tasks or acting on behalf of public authorities, within the scope resulting from applicable legal provisions;
- entities providing services necessary for the implementation of NCBR tasks, including NCBR+ sp. z o.o.;
- IT service providers;
- technical and organisational support providers;
- archiving and document destruction service providers;
- postal, courier and payment service providers;
- marketing service providers.

## **10. Rights of the Data Subject**

With regard to NCBR, you have the following rights:

- the right to access your personal data;
- the right to rectify your personal data;
- the right to erase your personal data;
- the right to restrict processing of your personal data;
- the right to object to the processing of your personal data.

Requests concerning the exercise of these rights may be submitted to the Data Protection Officer using the contact details indicated in point 2 above.

## **11. Right to Lodge a Complaint**

You have the right to lodge a complaint with the President of the Personal Data Protection Office (UODO).

## **12. Automated Decision-Making**



Personal data shall not be subject to automated decision-making, including profiling.

### **13. Transfers to Third Countries**

Your personal data shall not be transferred to third countries.

## **INFORMATION CLAUSE OF THE POLISH NATIONAL AGENCY FOR ACADEMIC EXCHANGE (NAWA)**

### **Controller**

#### **Polish National Agency for Academic Exchange (NAWA)**

ul. Polna 40

00-635 Warsaw

Poland

### **Purpose and Legal Basis of Processing**

NAWA processes your personal data pursuant to Article 6(1)(c) and (e) GDPR, as well as Article 9(2)(g) and (j) GDPR in conjunction with Article 6(1)(c) and (e) GDPR, for the purpose of:

1. carrying out the public task related to the internationalisation of higher education and science entrusted to the Agency, as specified in Article 2 of the Act of 7 July 2017 on the Polish National Agency for Academic Exchange;
2. fulfilling the Agency's legal obligations related to the implementation of the Project funding agreement, including obligations concerning:
  - statistics;
  - monitoring;
  - reporting;
  - communication;
  - publication;
  - evaluation;
  - financial management;
  - verification;
  - project audits;
  - determination of participant eligibility.

## **Categories of Personal Data Processed**

The Agency may process the following categories of personal data:

### **1. Identification Data**

Including data referred to in Article 87(2)(1) of the Act on the Principles of Implementing Tasks Financed from European Funds under the Financial Perspective 2021–2027, including:

- first name;
- surname;
- address;
- e-mail address;
- telephone number;
- fax number;
- PESEL number;
- REGON number;
- education;
- internet identifiers.

### **2. Project Participation Data**

Data related to participation in the Project, referred to in Article 87(2)(2) of the above-mentioned Act, including:

- remuneration;
- form of involvement in the Project;
- duration of involvement in the Project.

### **3. Financial Eligibility Documentation Data**

Data appearing on documents confirming the eligibility of expenditure, referred to in Article 87(2)(3) of the above-mentioned Act, including:

- bank account number;
- professional experience.

### **4. Special Categories of Personal Data**

Data referred to in Article 87(3) of the above-mentioned Act concerning:

- racial or ethnic origin;
- health data,

within the meaning of Article 9 GDPR.

### **5. Image Data**

Data concerning the image of persons participating in Programme implementation or events related thereto, processed on the basis of separately granted voluntary consent.

### **Data Retention Period**

Your personal data shall be processed by the Agency until the purpose of processing ceases to exist or for the period resulting from the archival category of the documents containing the data, as specified in the provisions implementing the Act of 14 July 1983 on the National Archival Resource and Archives.

### **Disclosure and Entrustment of Data**

Subject to appropriate safeguards, the Agency may disclose your personal data to entities authorised to receive such data under applicable legal provisions, including in particular the provisions of the Act on the Principles of Implementing Tasks Financed from European Funds under the Financial Perspective 2021–2027.

The Agency may also transfer personal data to processors acting on behalf of the Agency under data processing agreements.

### **Transfers to Third Countries**

Your personal data shall not be transferred to a third country or international organisation. Should such a transfer become necessary, the Agency shall ensure appropriate safeguards and effective legal remedies, including, in particular, the use of Standard Contractual Clauses adopted by the European Commission, and shall inform you accordingly.

### **Automated Decision-Making**

No automated decision-making, including profiling, takes place.

### **Obligation to Provide Data / Source of Data**



The Agency obtains personal data directly from the data subjects or from institutions and entities involved in the implementation of FERS projects, including in particular applicants, beneficiaries and partners.

Refusal to provide personal data shall result in the application not being considered or in the inability of a given person to participate in the Programme.

### **Rights of the Data Subject**

You may submit requests concerning:

- access to personal data;
- rectification of personal data;
- data portability;
- restriction of processing,

under the conditions specified in the GDPR.

You also have the right to lodge a complaint with the President of the Personal Data Protection Office if you consider that the processing of your personal data by the Agency violates applicable legal provisions.

### **Contact with the Data Protection Officer**

[odo@nawa.gov.pl](mailto:odo@nawa.gov.pl)

## **INFORMATION CLAUSE OF THE MINISTER RESPONSIBLE FOR REGIONAL DEVELOPMENT**

In order to fulfil the obligation imposed by Articles 13 and 14 of the GDPR in connection with Article 88 of the Act on the Principles of Implementing Tasks Financed from European Funds under the Financial Perspective 2021–2027, we hereby provide information on the processing of personal data.

### **I. Data Controller**

A separate controller of your personal data is:

#### **The Minister Responsible for Regional Development**

ul. Wspólna 2/4

00-926 Warsaw

Poland

### **II. Purpose of Processing**

Personal data shall be processed in connection with the implementation of the European Funds for Social Development Programme (FERS), in particular for the purposes of:

- monitoring;
- reporting;
- communication;
- publication;
- evaluation;
- financial management;
- verification;
- audits;
- determining participant eligibility.

Providing personal data is voluntary but necessary for achieving the above-mentioned purposes.

Refusal to provide personal data is equivalent to the inability to undertake the relevant actions.

### **III. Legal Basis for Processing**

Your personal data are processed because the Controller is required to do so by law pursuant to Article 6(1)(c), Article 9(2)(g) and Article 6(1)(e) GDPR, including in particular:

- Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund, and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the Instrument for Financial Support for Border Management and Visa Policy;
- Regulation (EU) 2021/1057 of the European Parliament and of the Council of 24 June 2021 establishing the European Social Fund Plus (ESF+) and repealing Regulation (EU) No 1296/2013;
- the Act of 28 April 2022 on the Principles of Implementing Tasks Financed from European Funds under the Financial Perspective 2021–2027, in particular Articles 87–93;
- the Act of 14 June 1960 – Code of Administrative Procedure;
- the Act of 27 August 2009 on Public Finance.

### **IV. Source of Data**

Personal data are obtained directly from the data subjects or from institutions and entities involved in Programme implementation, including in particular applicants, beneficiaries and partners.

### **V. Access to Personal Data**

Access to personal data is granted to employees and associates of the Controller.

In addition, personal data may be entrusted or disclosed to:

1. entities entrusted with the implementation of tasks within FERS;
2. institutions of the European Commission, the Minister responsible for public finance, and the President of the Social Insurance Institution (ZUS);

3. entities providing services related to the operation and development of IT systems and communication services, including IT solution providers and telecommunications operators.

## **VI. Data Retention Period**

Personal data shall be stored for the period necessary to achieve the purposes specified in Section II.

## **VII. Rights of Data Subjects**

You are entitled to the following rights:

1. the right of access to personal data and to obtain a copy thereof (Article 15 GDPR);
2. the right to rectify personal data (Article 16 GDPR);
3. the right to erasure of personal data (Article 17 GDPR), unless the circumstances referred to in Article 17(3) GDPR apply;
4. the right to request restriction of processing (Article 18 GDPR);
5. the right to data portability (Article 20 GDPR), where processing is based on a contract and carried out by automated means;
6. the right to lodge a complaint with the President of the Personal Data Protection Office (Article 77 GDPR) if you believe that the processing of your personal data violates GDPR or other applicable provisions concerning personal data protection.

## **VIII. Automated Decision-Making**

Personal data shall not be subject to automated decision-making, including profiling.

## **IX. Transfers to Third Countries**

Your personal data shall not be transferred to a third country.

## **X. Contact with the Data Controller and Data Protection Officer**

If you have any questions concerning the processing of personal data by the Minister responsible for Regional Development, you may contact the Data Protection Officer:

By post:



Ministerstwo Funduszy i Polityki Regionalnej

ul. Wspólna 2/4

00-926 Warsaw

Poland

By e-mail:

[IOD@mfipr.gov.pl](mailto:IOD@mfipr.gov.pl)

### SIGNATURE

Field	Information
Full name of the Participant	
Place and date	
Signature	