

## **NOTICE ON THE PROTECTION OF BENEFICIARIES' PERSONAL DATA**

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The "Accompagnement et Coaching pour le Travail" service (hereinafter referred to as the ACT service), managed by the non-profit association "Inter-Actions Asbl", undertakes to comply with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (the "GDPR"). The ACT service will ensure the protection of all your personal data, in accordance with the principles established, as part of the collaboration mandate.

### **1. Purposes and legal basis of processing**

Personal data will be used for administrative purposes and to manage the collaboration mandate for the entire duration of the contractual relationship.

This includes the processing of personal data for the following purposes:

- **Managing your application:** The ACT service analyses your situation to provide you with assistance tailored to your specific needs;
- **Social permanence management:** The ACT service develops a plan tailored to your situation and assists you with your social and professional integration;
- **Training management:** The ACT service offers training courses to Revis beneficiaries, designed to promote successful socio-professional integration, and help you realise your full potential. These courses are designed to help you develop your skills, define your career goals and prepare for a job search;
- **Polygone Social Project Management:** The ACT service, in collaboration with ADEM and Polygone, offers a programme aimed at jobseekers, providing practical training in areas such as maintenance of green spaces, demolition and clearance of buildings, and installation of modular buildings.

In certain situations, the processing of your personal data will be based on your explicit consent, for example in the case of social surveys designed to assess your satisfaction with the services offered by the ACT service.

In addition, certain processing operations may also be based on the legitimate interests pursued by the ACT service, in particular with regard to guaranteeing appropriate social and professional support. In this context, your data may be shared with third parties, including state bodies, associations and social services.

### **2. Types of data processed**

Most of the information will be provided by you, but some may come from other external sources (e.g. government bodies).

Depending on the purpose of the data collection, we may collect the following data:

<b>Data Categories</b>	<b>Type of data</b>
Identification data	Last name First name Date and place of birth Nationality National identification number
Contact details	Postal address Email address Telephone number

Location data	Postal address Country of residence
Data on behaviour and personal life	Level of education Household composition
Professional data	Professional history Internship Warnings Requests
Sensitive data	State of health

The ACT service may collect information relating to your state of health when this is necessary for your social care as part of your registration with the service. This data may be collected in a variety of situations, such as to assess your eligibility for specific assistance, to plan your social and professional integration pathway taking into account your health conditions, or to set up personalised support measures. It may also be necessary to adapt the training on offer to your specific needs, thus ensuring successful socio-professional integration.

### 3. **Recipient of personal data**

Depending on the purposes for which the data is to be used, the following people may have access to your personal data:

- ACT service staff: To facilitate your social and professional integration, by offering you a social monitoring service focused on your professional development.
- Public bodies, associations and social services: To assist you with your social and professional integration;
- The Data Protection Officer (DPO): In the event of a data subject requesting his or her rights.

### 4. **Data retention period**

The ACT service undertakes to retain personal data only for as long as is strictly necessary to achieve the purposes for which it was collected. In concrete terms, this means that your information will be kept for the duration of the collaboration mandate and at the latest 5 years after the end of the contractual relationship, unless Inter-Actions is subject to a legal obligation to keep data for a longer period.

### 5. **Safety measures**

The ACT service undertakes to implement technical measures to ensure the security of your personal data. We ensure that the persons authorised to process the personal data received have undertaken to respect confidentiality or are subject to an appropriate legal obligation of confidentiality. This obligation of confidentiality remains valid after the end of the contract.

In assessing the appropriate level of security, we take due account of the state of the art, the costs of implementation, the nature, scope, context and purpose of the processing and the risk to data subjects.

### 6. **Rights of beneficiaries**

As an individual, you have a number of rights in relation to your personal data, in particular:

- **Right of access:** You may request access to your personal data at any time, as well as a copy of the data;

- **The right to rectify data:** You may request that inaccurate or incomplete data be rectified at any time;
- **The right to erasure of personal data:** You may request that your data be deleted if, for example, the data is no longer necessary for the purposes for which it was collected or processed;
- **The right to restrict processing:** The possibility of requesting to restrict the processing of data (e.g. if you question the accuracy of the data concerning you or if you object to the processing of data concerning you);
- **The right to portability:** The possibility of transferring your data to another controller in a structured, commonly used and machine-readable format, if the processing is carried out by automated means or if it is based on prior consent;
- **The right to object to processing:** You may object to the processing of your data and withdraw your consent, if the processing is based on consent.

To exercise these rights, the beneficiary is invited to contact the Data Protection Officer (DPO) at [dpo@i-a.lu](mailto:dpo@i-a.lu).

All requests will be processed by the DPO within one month, after verification of the applicant's identity if necessary. This period may be extended to a further 2 months if your request is complex or if there is a large number of requests. Requests will be accepted within the limits laid down by law, and in particular articles 15 to 23 of the RGPD.

If you are not satisfied with our response, you also have the right to lodge a complaint at any time with the Commission nationale pour la protection des données ("CNPD"), the Luxembourgish supervisory authority for data protection, or with any other competent supervisory authority in an EU Member State.

#### 7. Updates to the notice

We regularly review this notice and may change, add or remove portions of this document at any time. Beneficiaries will be notified of any changes before they take effect.

Done in Luxembourg,

Name of beneficiary / Name of parent / Name of legal guardian:

Signature preceded by the words "Read and approved":