

PRIVACY POLICY

The Student Trainee Exchange Programme (STEP)

1. Definitions and interpretation

The following terms shall have the following meaning:

- (a) “**ELSA**” refers to the European Law Students’ Association represented by an executive board based in Brussels, Belgium;
- (b) “**ELSA National Group**” refers to the national branches constituting the ELSA network in accordance with the internal regulations of ELSA;
- (c) “**ELSA Local Group**” refers to the local branches constituting an ELSA National Group in accordance with the internal regulations of the respective ELSA National Group;
- (d) “**STEP**” refers to the Student Trainee Exchange Programme which is a flagship project of ELSA, allowing both ELSA members and members of ELSA’s partner associations to apply for legal work placements offered at various organisations in different countries;
- (e) “**Traineeship Provider**” refers to an organisation which is external to ELSA and offers placements open for applications through STEP.
- (f) “**Applicant**” refers to an ELSA member or a member of ELSA’s partner association who has submitted their application through ELSA for a STEP Traineeship;
- (g) “**SAF**” refers to the Student Application Form which is completed and submitted by the Applicant to ELSA, and which specifies the STEP Traineeship(s) to which the Applicant wants to apply.
- (h) “**Personal data**” refers to any information relating to an identifiable natural person, including but not limited to names, addresses, telephone numbers, email addresses, and any other information or combination of information which enables that person to be identified.
- (i) “**Non-personal data**” refers to any information which cannot be tracked back to an identifiable natural person and which is logged for statistical and internal system-related purposes.
- (j) “**Processing**” refers to all activities relating to the use of personal data by a legal person, including but not limited to the collection, storage, and disposal of personal data.
- (k) “**Data subject**” refers to any natural person whose personal data is being processed.

2. General GDPR compliance

ELSA processes all personal information in accordance with 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 information, and repealing Directive 95/46/EC, i.e. the General Data Protection Regulation (“GDPR”), and the governing principles of Article 5 of GDPR, namely:

- (a) Lawfulness, fairness, and transparency;

- (b) Purpose limitation;
- (c) Data minimisation;
- (d) Accuracy;
- (e) Storage limitation; and
- (f) Confidentiality and integrity.

3. Data collection

ELSA collects personal data submitted by the Applicant by the means of the SAF. This data is collected by ELSA to enable ELSA to verify the information provided in the SAF and communicate with the Applicant.

4. Data storage

- (a) ELSA shall store the personal and non-personal data of the Applicant for no longer than necessary, in accordance with the principle of storage limitation in Article 5 of GDPR.
- (b) ELSA shall not use the non-personal data of the Traineeship Provider and applicants for statistical purposes.

5. Data sharing

ELSA may share the personal data of the Applicant with the National Groups and/or Local Groups, and the Traineeship Providers.

6. Rights of the data subject

At any moment, the Traineeship Provider may exercise its right to:

- (a) Data information;
- (b) Access its personal information;
- (c) Rectify its personal information;
- (d) Erase its personal information;
- (e) Restrict the processing of its personal information;
- (f) Data portability;
- (g) Revoke its consent to data processing by ELSA;
- (h) Request for the modification of its personal information or the restriction of the data processing by ELSA.

In order to exercise the above-mentioned rights, the Applicant shall contact the Vice President in charge of STEP at step@elsa.org.