Privacy Policy for Evaluation Forms – Trainees

ELSA Traineeships 2026/2027 · Pre-Traineeship and Post-Traineeship Evaluation Forms, certificate and testimonials

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Summary

Who we are

The data controller for the processing activities within this Policy is the European Law Students' Association (ELSA) International:

- Address: 239 Boulevard Général Jacques 1050 Ixelles, Brussels, Belgium
- E-mail: secgen@elsa.org, professionaldevelopment@elsa.org, dataprotection@elsa.org
- Phone: +32 2 646 2626

Personal data we process

- Personal identification (name and surname, and the country and city of your permanent residence)
- Contact information (the e-mail address at which you want to receive the ELSA Traineeships Certificate of Participation)
- ELSA Activity (the National Group and Local Group of ELSA of which you are a member)
- Traineeship details (the name, street address, country and city of the Traineeship Provider, the name of your supervisor, the format of the traineeship (e.g. on-site or remote), its start and end dates and, where already agreed, its remuneration)
- Your expectations (Pre-Traineeship Evaluation Form) (your expectations of the Traineeship Provider and of the Hosting ELSA Group, the hard and soft skills you expect to develop, your rating of the application process and of the assistance ELSA gave you, whether you have secured accommodation, completed the administrative tasks and booked your travel, whether you need help with accommodation, administrative tasks or a visa, and your additional comments)
- Your experience (Post-Traineeship Evaluation Form) (whether the Traineeship Provider and the Hosting ELSA Group met your expectations, the hard and soft skills you developed, your answers on the

communication, tasks, introduction and feedback you received from the Traineeship Provider and your supervisor or mentor, the assistance you received with accommodation and how you secured it, any issues with administrative tasks such as a visa or residence permit, whether an ELSA member introduced you to the Traineeship Provider, the amount of your remuneration and whether it was sufficient and met your expectations, whether you would recommend the Traineeship Provider, and your additional comments)

- The Traineeship Provider's evaluation of your traineeship (the Traineeship Provider's overall satisfaction with your performance, the extent to which you met its expectations of professionalism, motivation and engagement, what it valued most about hosting you and what in your preparation could be improved, together with the format and dates of your traineeship)
- Certificate request (Certificate Generator) (your name and surname, the e-mail address to which the certificate is sent, the name of your Traineeship Provider, the country and city where your traineeship took place, its start and end dates, and the date of your request)
- Testimonial and professional picture (your testimonial, your professional picture if you add one, and your answer to whether ELSA may publish your testimonial in part or in whole)
- Technical and usage data (IP address, device and browser information, and usage and log data recorded by JotForm, by BRYTER for the Certificate Generator or, once the forms are moved to the ELSA Traineeships portal, recorded automatically by the Base44 platform to run and secure the portal (ELSA officers do not see IP addresses when they handle forms in the portal))

Purposes of the Processing

- To provide trainees with the ELSA Traineeships Certificate of Participation, using the details given in the evaluation forms and in the Certificate Generator, and checking them against our records
- To pass your request for help with accommodation, administrative tasks or a visa to the Hosting ELSA Group and, for visa matters, to the Reception and Visa Team of ELSA International, so that they can assist you
- To answer your inquiries and provide support
- To collect your feedback through the Pre-Traineeship and Post-Traineeship Evaluation Forms, and to maintain and improve ELSA Traineeships
- To monitor the quality of the traineeships offered through ELSA, of the Traineeship Providers and of the support given by the Hosting ELSA Groups
- To receive the Traineeship Provider's evaluation of your traineeship and use it to monitor the quality of placements
- To create anonymous statistics on traineeships and share them with the ELSA Network, for example in the ELSA Traineeships Annual Report
- To publish your testimonial and professional picture on the ELSA Traineeships website, ELSA's social media and promotional materials
- To keep our forms, platforms and systems secure and functioning properly
- Notify you about changes to our Privacy Policy
- To establish, exercise or defend legal claims and protect the rights and interests of ELSA

Your rights

You possess the following data protection rights, that you can exercise by reaching out to us:

- Right to Access: you can request a copy of your personal data;
- Right to Correction: you can request us to rectify innacuracies or incompleteness in your personal data;
- Right to withdraw consent: you have the right to withdraw your consent at any time, affecting future processing;
- Right to erasure: you have the right to request the deletion of your personal data if it is no longer needed for the purposes it was collected or processed unlawfully;

- Right to restrict processing: you have the right to request the limitation of our processing activities, under certain circumstances;
- Right to data portability: you can request that we transmit your personal data to another data controller;
- Right to object to processing: under certain circumstances, you can object to our processing activities based on your specific situation;
- Right to file a complaint with a supervisory authority: you always have the right to lodge a complaint with a data protection authority if you believe that our data processing activities are unlawful.

More details

1 - About us

Welcome to our privacy policy ("privacy policy"), which outlines how we handle and safeguard your personal data when participating in ELSA Traineeships 2026/2027 organised by ELSA International.

The data processing is managed by the European Law Students' Association (ELSA) International, located at 239 Boulevard Général Jacques 1050 Ixelles, Brussels, Belgium (referred to as "the Association", "we", "our", or "us"). The Association is responsible for the data processing activities detailed in this policy and acts as the data controller.

Unless otherwise specified in this privacy policy, the terms used here have the same definitions outlined in the European Union's General Data Protection Regulation ("GDPR").

This Policy applies to:

- The processing of personal data of Trainees who complete the Pre-Traineeship and Post-Traineeship Evaluation Forms of ELSA Traineeships, and trainees whose traineeship a Traineeship Provider evaluates in the Evaluation Form for Traineeship Providers;

This Privacy Policy covers the Pre-Traineeship and Post-Traineeship Evaluation Forms, the ELSA Traineeships Certificate of Participation, testimonials, and the Traineeship Provider's evaluation of your traineeship. Your application and your placement are covered by our Privacy Policy for Trainees, published on the ELSA Traineeships portal.

2 - Personal Data Collection

Categories of Personal Data Collected

We gather and receive personal information for various purposes associated with the organisation of ELSA Traineeships 2026/2027 and the management of its participants. Specifically, we process the following categories of personal data:

- Personal identification (name and surname, and the country and city of your permanent residence)
- Contact information (the e-mail address at which you want to receive the ELSA Traineeships Certificate of Participation)
- ELSA Activity (the National Group and Local Group of ELSA of which you are a member)
- Traineeship details (the name, street address, country and city of the Traineeship Provider, the name of your supervisor, the format of the traineeship (e.g. on-site or remote), its start and end dates and, where already agreed, its remuneration)
- Your expectations (Pre-Traineeship Evaluation Form) (your expectations of the Traineeship Provider and of the Hosting ELSA Group, the hard and soft skills you expect to develop, your rating of the application process and of the assistance ELSA gave you, whether you have secured accommodation, completed the administrative tasks and booked your travel, whether you need help with accommodation, administrative tasks or a visa, and your additional comments)
- Your experience (Post-Traineeship Evaluation Form) (whether the Traineeship Provider and the Hosting ELSA Group met your expectations, the hard and soft skills you developed, your answers on the communication, tasks, introduction and feedback you received from the Traineeship Provider and your

supervisor or mentor, the assistance you received with accommodation and how you secured it, any issues with administrative tasks such as a visa or residence permit, whether an ELSA member introduced you to the Traineeship Provider, the amount of your remuneration and whether it was sufficient and met your expectations, whether you would recommend the Traineeship Provider, and your additional comments)

- The Traineeship Provider's evaluation of your traineeship (the Traineeship Provider's overall satisfaction with your performance, the extent to which you met its expectations of professionalism, motivation and engagement, what it valued most about hosting you and what in your preparation could be improved, together with the format and dates of your traineeship)
- Certificate request (Certificate Generator) (your name and surname, the e-mail address to which the certificate is sent, the name of your Traineeship Provider, the country and city where your traineeship took place, its start and end dates, and the date of your request)
- Testimonial and professional picture (your testimonial, your professional picture if you add one, and your answer to whether ELSA may publish your testimonial in part or in whole)
- Technical and usage data (IP address, device and browser information, and usage and log data recorded by JotForm, by BRYTER for the Certificate Generator or, once the forms are moved to the ELSA Traineeships portal, recorded automatically by the Base44 platform to run and secure the portal (ELSA officers do not see IP addresses when they handle forms in the portal))

You are under no obligation to provide your personal data. Nonetheless, it's important to be aware that we cannot register you for or provide you with ELSA Traineeships 2026/2027 without the essential personal data required to fulfil the contractual obligations between you and us.

How we collect personal data

We collect personal data about you in different ways, starting from your registration to your participation in ELSA Traineeships 2026/2027.

In particular, we collect personal data either directly or indirectly from you.

Direct Collection

- When you complete the Pre-Traineeship Evaluation Form after accepting your traineeship
- When you complete the Post-Traineeship Evaluation Form after your traineeship, including your testimonial and professional picture
- When you request your ELSA Traineeships Certificate of Participation through the ELSA Traineeships Certificate Generator
- When you correspond with us or with the Hosting ELSA Group about the help you asked for
- Through your use of the forms, which JotForm, BRYTER or the Base44 platform records in its technical and usage logs

Some of the personal data above does not come from you directly. Where that is the case, we receive it as follows:

- The Traineeship Provider's evaluation of your traineeship: from the Traineeship Provider that hosted you, through the Evaluation Form for Traineeship Providers it completes after your traineeship

Indirect Collection

- From the Traineeship Provider that hosted you, which evaluates your traineeship in the Evaluation Form for Traineeship Providers
- From the Hosting ELSA Group, in connection with the help you asked for in the Pre-Traineeship Evaluation Form

3 - Legal Basis and Purposes

Our justification for collecting and using the personal data as outlined in this Privacy Policy is contingent on the type of personal data collected and the specific objectives for which it is gathered.

No automated decision-making, including profiling, within the meaning of Article 22 GDPR takes place in the context of the processing activities described in this Privacy Policy.

Legal basis	Purposes
Contractual Obligations We collect and process personal data about you as a participant to register you and manage your participation. In particular, we rely on contractual obligations, to:	• To provide trainees with the ELSA Traineeships Certificate of Participation, using the details given in the evaluation forms and in the Certificate Generator, and checking them against our records • To pass your request for help with accommodation, administrative tasks or a visa to the Hosting ELSA Group and, for visa matters, to the Reception and Visa Team of ELSA International, so that they can assist you • To answer your inquiries and provide support
Consent We may rely on your voluntary consent, which you provided to us when sharing your personal data. In particular, we rely on your consent, to the extent agreed in the declaration of consent, to:	• To publish your testimonial and professional picture on the ELSA Traineeships website, ELSA's social media and promotional materials
Legitimate Interest We utilize legitimate interests as the legal basis for processing, based on our evaluation that the processing is equitable and justifiable and does not infringe upon your interests or fundamental rights and freedoms. Our legitimate interests are learning from the feedback of trainees and Traineeship Providers so that future cycles of ELSA Traineeships are organised better, monitoring the quality of the traineeships offered through ELSA and of the support given to trainees, reporting on the programme to the ELSA Network in anonymous form, keeping the evaluation forms secure, and establishing, exercising or defending legal claims. Our legitimate interests are, in particular to:	• To collect your feedback through the Pre-Traineeship and Post-Traineeship Evaluation Forms, and to maintain and improve ELSA Traineeships • To monitor the quality of the traineeships offered through ELSA, of the Traineeship Providers and of the support given by the Hosting ELSA Groups • To receive the Traineeship Provider's evaluation of your traineeship and use it to monitor the quality of placements • To create anonymous statistics on traineeships and share them with the ELSA Network, for example in the ELSA Traineeships Annual Report • To keep our forms, platforms and systems secure and functioning properly • To establish, exercise or defend legal claims and protect the rights and interests of ELSA
Legal Compliance We process personal data when necessary to comply with legal obligations and regulations. In particular, we rely on legal compliance, to:	• Notify you about changes to our Privacy Policy

You may withdraw your consent at any time by e-mail to secgen@elsa.org, with a copy to professionaldevelopment@elsa.org or dataprotection@elsa.org. The withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

You may object to processing carried out on the basis of our legitimate interests at any time, on grounds relating to your particular situation, by e-mail to secgen@elsa.org, with a copy to professionaldevelopment@elsa.org or dataprotection@elsa.org.

Your certificate and your testimonial

Completing both evaluation forms and requesting the certificate through the ELSA Traineeships Certificate Generator are the conditions for receiving the ELSA Traineeships Certificate of Participation, because together they give us the details printed on it; we check those details against our records before we send the certificate. Objecting to the use of your feedback answers never affects your certificate. Giving a testimonial and a professional picture is optional; we publish them only if you agree, and refusing or withdrawing your consent never affects your certificate or your participation in ELSA Traineeships.

The Traineeship Provider's evaluation of your traineeship is read only by the ELSA International Traineeships Team. It is not used to take any decision about you and has no influence on your certificate.

4 - Data Retention

We keep personal data for the duration necessary to fulfil the purposes for which it was obtained, per legal and regulatory obligations, as well as contractual agreements. Once this retention period concludes, we either delete or irreversibly anonymize your personal data.

5 - Data Transfers & Sharing

Data Recipients

We collaborate with third-party service providers to support the functioning of our services, as well as with administrative, regulatory and public authorities when there is a legal or administrative obligation we are bound to regarding the sharing of your personal data ("data recipients"). Our service providers assist in various activities, such as facilitating payments and providing IT infrastructure. They are granted access to your personal data solely to the extent required to carry out these tasks.

Types of data recipients who may access your personal data:

- The Hosting ELSA Group (the Local and National Group of ELSA in the country of your traineeship), which sends you the Post-Traineeship Evaluation Form and receives your request for help where you ask for it
- Visitors of the ELSA Traineeships website and of ELSA's social media, only where you consent to the publication of your testimonial and picture
- Cloud Server Providers (e.g. Google Workspace/Gmail, Microsoft)
- IT Software Providers
- Base44 / Wix.com Ltd., insofar as its Terms of Service allow it to use data stored on its platform for its own purposes, such as maintaining and improving its services and training its AI models; for any such use Base44 acts on its own responsibility under its own privacy policy (https://base44.com/privacy-policy) and not on ELSA's instructions
- JotForm Inc. (United States), the online form platform on which the evaluation forms are completed until they are moved to the ELSA Traineeships portal (data processor)
- BRYTER GmbH (Germany), the platform on which the ELSA Traineeships Certificate Generator runs; it stores the data on servers in the European Union (data processor)
- Base44 (Base44, Inc.), the AI app-building platform operated by Wix.com Ltd. (Israel) on which the ELSA Traineeships portal is built and hosted, and which stores the portal's data on servers in the United States (data processor; contact: compliance@base44.com)
- MongoDB (United States), data storage and hosting for Base44 (data sub-processor)
- Render (United States), server services for Base44 (data sub-processor)
- SendGrid (United States), e-mails sent by the platform (data sub-processor)
- Google Cloud Platform (United States), analytics services for Base44 (data sub-processor)
- Datadog (United States) and Logfire (United Kingdom), technical logging for Base44 (data sub-processor)
- OpenAI and Anthropic (United States), AI language-model providers that process content sent to them when the Base44 platform's AI functions are used, including when the portal is built or modified (data sub-processor)
- Langfuse (Germany), logging of requests made to those AI language models (data sub-processor)
- Wix.com Ltd. (Israel), provision and improvement of the Base44 services (data sub-processor)

The ELSA Traineeships portal and Base44

The ELSA Traineeships portal (https://traineeships.elsa.org), through which the evaluation forms will be completed once they are moved from JotForm, is built and hosted on Base44, an AI app-building platform operated by Wix.com Ltd. Base44 stores the data entered in it on servers in the United States and uses the subprocessors listed above. We use Base44 as our data processor under its standard Terms of Service and its

standard Data Processing Addendum, which incorporates the standard contractual clauses of the European Commission. These terms were not individually negotiated with ELSA, and Base44 may amend them by publishing a new version; we keep a dated copy of the version we rely on.

Base44's Terms of Service also allow it to use data stored on its platform for its own purposes, such as maintaining and improving its services and training its AI models. For any such use Base44 is responsible itself, under its own privacy policy. We do not use the platform's AI functions to analyse your answers or to make decisions about you.

Third-Country and International Organisation Transfers

It's worth noting that we engage data recipients located in third countries, which are regions outside the EU. These third countries may not offer a level of data protection equivalent to that of the EU.

To ensure the security of your personal data during international transfers, we adhere to our contractual obligations and the applicable data protection regulations. These safeguards encompass:

- Transferring data to countries that have received an adequacy decision by the European Commission, including, where applicable, transfers to entities certified under the EU–US Data Privacy Framework.
- Implementing standard contractual clauses provided by the European Commission, per Commission Implementing Decision (EU) 2021/914 of 4 June 2021, as well as supplementary measures for the transfer, where we deem those measures as necessary to ensure an essentially equivalent level of protection to that of the EU.

Where neither of the above is available, we transfer personal data only where the transfer is necessary for the performance of the agreement between you and us (Article 49(1)(b) GDPR). This concerns passing your request for help with accommodation, administrative tasks or a visa to a Hosting ELSA Group located in a third country without an adequacy decision that has not yet acceded to the standard contractual clauses that ELSA International concludes with ELSA Groups.

We and/or our service providers transfer your personal data and process it in various third countries. These countries include:

- The United States of America
- The State of Israel
- The United Kingdom of Great Britain and Northern Ireland
- The Swiss Confederation
- Republic of Albania
- Republic of Armenia
- Republic of Azerbaijan
- Bosnia and Herzegovina
- Georgia
- Republic of Moldova
- Montenegro
- Republic of North Macedonia
- Republic of Serbia
- Republic of Türkiye
- Ukraine
- Any other country outside the European Economic Area in which the Hosting ELSA Group of your traineeship is located

The standard contractual clauses for transfers to Base44 and its subprocessors are incorporated in Base44's Data Processing Addendum.

For JotForm, the standard contractual clauses are incorporated in JotForm's data processing agreement. For ELSA Groups located in a third country without an adequacy decision, the standard contractual clauses (Module One) are set out in the Intra-ELSA Data Transfer Agreement, to which each such ELSA Group accedes. The ELSA Groups

that have acceded, with their contact details, are listed on the Privacy & Terms page of the ELSA Traineeships portal.

In cases where the transfer to a third country or international organisation is based on the usage of standard contractual clauses provided by the European Commission, you have the right to ask for a copy of the clauses under which your personal data is transferred to a third country. Bear in mind that the contract will be redacted in what concerns business secrets or other confidential information (e.g. personal data of other individuals). You may ask for the applicable copies by reaching out to: secgen@elsa.org, with a copy to professionaldevelopment@elsa.org or dataprotection@elsa.org

Where a transfer takes place to a third country without an adequacy decision, it is conceivable that authorities in that third country, such as intelligence services, could access the transferred data. Consequently, the enforceability of your data subject rights may not be guaranteed.

Data Disclosure

We may disclose your personal data when we have a sincere belief that such disclosure is essential for the following purposes:

- To adhere to a legal obligation, which includes cases where such disclosure is mandated by law or in response to valid requests from public authorities, such as a court or government agency.
- To safeguard the security of our services and safeguard our rights or property.
- To avert or investigate potential misconduct linked to our operations.

6 - Data Security

We implement reasonable technical and organisational security measures that we consider appropriate to safeguard your stored personal data from manipulation, loss, or unauthorized access by third parties. Our security measures are continuously updated to align with advancements in technology.

We place significant emphasis on internal data privacy. Our staff and engaged service providers are bound by confidentiality and must comply with relevant data protection laws. Moreover, they are granted access to personal data only to the extent necessary for the performance of their respective duties or obligations.

We value the security of your personal data; however, please bear in mind that no method of transmitting data over the internet or electronic storage can be guaranteed 100% secure. While we make every effort to employ commercially reasonable measures to protect your personal data, we cannot provide absolute security. We recommend employing antivirus software, firewalls, and similar tools to enhance the protection of your system.

7 - Your Rights

You possess the following data protection rights. To exercise these rights, please reach out to us at the provided address or send an e-mail to secgen@elsa.org, with a copy to professionaldevelopment@elsa.org or dataprotection@elsa.org. Please be aware that we may ask you to verify your identity before addressing your requests.

- Right to Access: You have the right to request a copy of your personal data, which we will furnish to you in an electronic format.
- Right to Correction: You can request us to rectify any inaccuracies or incompleteness in your data.
- Right to Withdraw Consent: If you've given your consent for the processing of your personal data, you have the right to withdraw it at any time, affecting future processing, but not the lawfulness of the data processing activities before it. Once we receive your withdrawal of consent, we will no longer process your information for the purpose(s) you initially consented to, unless there exists another legal basis for processing.
- Right to Erasure: You have the right to request the deletion of your personal data when it is no longer necessary for the purposes it was collected, or if it was processed unlawfully.
- Right to Restrict Processing: You can request the limitation of our processing of your personal data in cases where you believe it to be inaccurate, processed unlawfully, or no longer needed for the original purpose, but cannot be deleted due to legal obligations or your own request.

- Right to Data Portability: You can request that we transmit your personal data to another data controller in a standard format (e.g., Excel), if you provided this data to us and we processed it based on your consent or to fulfil contractual obligations.
- Right to Object to Processing: If the legal basis for processing your personal data is our legitimate interest, you have the right to object to such processing based on your specific situation. We will respect your request, unless we have a compelling legal basis for the processing that outweighs your interests or if we need to continue processing the data for legal defense purposes.
- Right to File a Complaint with a Supervisory Authority: If you believe that the processing of your personal data violates data protection laws, you have the right to lodge a complaint with a data protection supervisory authority. In the EU and EEA, you can exercise this right by contacting a supervisory authority in your country of residence, workplace, or where you believe the infringement occurred. You can find a list of relevant authorities here: https://edpb.europa.eu/about-edpb/about-edpb/members_en.

We will provide you with an answer to your requests within 30 days of receipt. This response timeframe may be extended if the request is particularly complex, of which we will inform you promptly. Within that timeframe, we will either comply with your request or provide you with the reasons why your request cannot be complied with.

8 - Changes to this Privacy Policy

Our Privacy Policy may be updated periodically. We encourage you to check this Privacy Policy from time to time for any modifications.

We furthermore put in our best efforts to inform you of any changes to this Privacy Policy, by adopting appropriate means to grab your attention to these changes. To that end, we will inform you by e-mail of any changes to this Policy that apply to you.

We ensure that we inform you before proceeding to these changes, by notifying you through the previous means at least 14 days before making the changes come into force.

Changes to this Privacy Policy become effective once they are published on this page.

9 - Contact Us

If you have any inquiries or concerns regarding this Privacy Policy, please do not hesitate to contact us at:

- the European Law Students' Association (ELSA) International
- 239 Boulevard Général Jacques 1050 Ixelles, Brussels, Belgium
- secgen@elsa.org, professionaldevelopment@elsa.org, dataprotection@elsa.org