ELSA Traineeships

The European Law Students' Association

Privacy Policy for Trainees

ELSA Traineeships 2026/2027 · applicants and trainees

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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 (full name, date of birth, and the city and country where you live);
- Contact information (e-mail address and phone number);
- ELSA Activity (the Local Group and National Group of ELSA of which you are a member);
- Professional and Educational Details (your educational level, your degrees, the languages you speak and your level in each, your legal skills and your level in each with the proof you give for them, and your CV);
- Application process (your application ID, the traineeships you apply for (up to three, in order of preference) and your motivation letter for each, the verification status and comments of your Local Group, your National Group and ELSA International, and the scores and comments recorded when your application is assessed and matched);
- Traineeship details (the assessment of your application by each Traineeship Provider in the portal (approve, neutral or reject) and any comments it enters, the outcome of your application (offer, waitlist or decline), your acceptance or refusal of an offer, the Traineeship Provider and the Hosting ELSA Group, and the format, place, dates and remuneration of the traineeship);
- Requests for help (the information you give the Hosting ELSA Group or the Reception and Visa Team of ELSA International when you ask for help with your visa, travel or accommodation, such as your nationality and home country, the embassy or visa centre you apply through, the progress of your visa application, and your wishes and budget for accommodation);

- Technical and usage data (IP address, device and browser information, and usage and log data, which the Base44 platform records automatically to run and secure the ELSA Traineeships portal; ELSA officers do not see your IP address when they handle forms and applications in the portal).

Purposes of the Processing

- To receive your application through the Traineeship Application Form and administer it in the ELSA Traineeships portal;
- To verify your application through your Local and National Group of ELSA and through ELSA International, and to contact you where information or proof of your skills is missing;
- To assess and score your application against the published ELSA Traineeships evaluation criteria and to match it to the traineeships you applied for;
- To share your matched application with the Traineeship Provider of each traineeship you applied for, so that it can make its own selection;
- To inform you about the outcome of your application(s);
- To communicate to you the Traineeship Provider's decision to offer, waitlist or decline your application, and to record whether you accept the offer;
- To inform the Hosting ELSA Group and your own National Group of ELSA of your acceptance, so that the Hosting ELSA Group can put you in contact with the Traineeship Provider;
- To facilitate your reception and support during the traineeship through the Hosting ELSA Group and the Reception and Visa Team of ELSA International, including help with your visa, travel or accommodation if you ask for it;
- To answer your inquiries and provide support;
- To keep records of applications and placements for the administration of each cycle;
- To create anonymous statistics on applications and placements and share them with the ELSA Network;
- To keep our forms, platforms and systems secure and functioning properly;
- Notify you about changes to our Privacy Policy;
- Comply with applicable legal, tax, accounting or regulatory obligations;
- 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 inaccuracies or incompleteness in your personal data;
- 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 Applicants to ELSA Traineeships who submit a Traineeship Application Form, and trainees who accept a traineeship offer.

The Pre-Traineeship and Post-Traineeship Evaluation Forms, the ELSA Traineeships Certificate of Participation and testimonials are covered by our separate Privacy Policy for Evaluation Forms – Trainees, which is published on the ELSA Traineeships portal and linked in those forms.

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 (full name, date of birth, and the city and country where you live);
- Contact information (e-mail address and phone number);
- ELSA Activity (the Local Group and National Group of ELSA of which you are a member);
- Professional and Educational Details (your educational level, your degrees, the languages you speak and your level in each, your legal skills and your level in each with the proof you give for them, and your CV);
- Application process (your application ID, the traineeships you apply for (up to three, in order of preference) and your motivation letter for each, the verification status and comments of your Local Group, your National Group and ELSA International, and the scores and comments recorded when your application is assessed and matched);
- Traineeship details (the assessment of your application by each Traineeship Provider in the portal (approve, neutral or reject) and any comments it enters, the outcome of your application (offer, waitlist or decline), your acceptance or refusal of an offer, the Traineeship Provider and the Hosting ELSA Group, and the format, place, dates and remuneration of the traineeship);
- Requests for help (the information you give the Hosting ELSA Group or the Reception and Visa Team of ELSA International when you ask for help with your visa, travel or accommodation, such as your nationality and home country, the embassy or visa centre you apply through, the progress of your visa application, and your wishes and budget for accommodation);
- Technical and usage data (IP address, device and browser information, and usage and log data, which the Base44 platform records automatically to run and secure the ELSA Traineeships portal; ELSA officers do not see your IP address when they handle forms and applications 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 submit the Traineeship Application Form (TAF) through the ELSA Traineeships portal (https://traineeships.elsa.org);
- When you provide further information or documents at the request of your Local or National Group of ELSA or of ELSA International to verify your application;
- When you accept or refuse a traineeship offer, and when you correspond with us, your National Group or the Hosting ELSA Group;
- Through your use of the ELSA Traineeships portal, which 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:

- Traineeship details: the Traineeship Provider's assessment and comments come from the Traineeship Provider, through its account in the ELSA Traineeships portal

Indirect Collection

- From your Local and National Group of ELSA, which verifies your application and may correct or complete it in agreement with you;
- From the Traineeship Provider, which records its assessment of and any comments on your application in the portal and communicates its selection;
- From the Hosting ELSA Group, in connection with your reception and support during the traineeship.

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 receive your application through the Traineeship Application Form and administer it in the ELSA Traineeships portal • To verify your application through your Local and National Group of ELSA and through ELSA International, and to contact you where information or proof of your skills is missing • To assess and score your application against the published ELSA Traineeships evaluation criteria and to match it to the traineeships you applied for • To share your matched application with the Traineeship Provider of each traineeship you applied for, so that it can make its own selection • To inform you about the outcome of your application(s) • To communicate to you the Traineeship Provider's decision to offer, waitlist or decline your application, and to record whether you accept the offer

Legal basis	Purposes
	• To inform the Hosting ELSA Group and your own National Group of ELSA of your acceptance, so that the Hosting ELSA Group can put you in contact with the Traineeship Provider • To facilitate your reception and support during the traineeship through the Hosting ELSA Group and the Reception and Visa Team of ELSA International, including help with your visa, travel or accommodation if you ask for it • To answer your inquiries and provide support
Legitimate Interest We utilise 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 running ELSA Traineeships as a programme of quality: keeping proper records of each cycle and reporting on it to the ELSA Network in anonymous form, keeping the ELSA Traineeships portal secure, and establishing, exercising or defending legal claims relating to a cycle. Our legitimate interests are, in particular, to:	• To keep records of applications and placements for the administration of each cycle • To create anonymous statistics on applications and placements and share them with the ELSA Network • 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 • Comply with applicable legal, tax, accounting or regulatory obligations

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.

How your application is assessed

Your application is first verified by your Local Group and National Group of ELSA and by ELSA International, which check that it is complete and that you meet the requirements of the traineeships you applied for. Members of the ELSA International Traineeships Team then assess each verified application, traineeship by traineeship, against the evaluation criteria published on the ELSA Traineeships portal: the motivation letter, the CV, legal skills, language skills and the proof of legal skills, for a maximum of 30 points. An application that scores zero in any criterion, for example because a required document is missing or because a motivation letter or CV is assessed as entirely generated by artificial intelligence, is not forwarded to the Traineeship Provider. The best-ranked applications are forwarded ("matched") to the Traineeship Provider, which alone decides whom to interview and to whom to offer a traineeship.

These assessments are made by people, not by the portal or by any automated tool. If your application is not forwarded, you may ask us for the main reasons and for a review of the assessment by contacting professionaldevelopment@elsa.org, as set out in the Terms and Conditions for Trainees.

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 anonymise your personal data.

At the end of each cycle, the officers of ELSA no longer have access to the personal data in applications through the ELSA Traineeships portal; only the number of applications received from each country remains visible. Traineeship Providers keep the applications they received under their own responsibility; our Terms and Conditions for Traineeship Providers require them to delete the applications of candidates they do not select at

the latest one year after the selection results. The records we need to keep for the purposes described in section 3 are kept in ELSA International's own systems.

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:

- Your Local and National Group of ELSA, which verifies your application and is informed of the outcome;
- The Local and National Group of ELSA in the country of your traineeship (the Hosting ELSA Group), which receives you and supports you during your traineeship;
- Traineeship Providers of the traineeships you applied for, which receive your matched application through their account in the ELSA Traineeships portal and decide for themselves whom to interview and to whom to offer a traineeship; each acts as an independent controller for its own selection and for your traineeship, under its own privacy information; the traineeship listing on the portal links to its privacy policy or website;
- 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;
- 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).

Traineeship Providers

Traineeship Providers are organisations outside ELSA, such as law firms, companies, institutions and non-governmental organisations. When we share your matched application with a Traineeship Provider, it receives your complete application, including your personal details, date of birth, CV and motivation letter, through its account in the ELSA Traineeships portal, from which it may also download it. From that moment the Traineeship Provider processes your personal data as an independent controller for its own purposes: reviewing your application, contacting you for an interview, deciding whether to make you an offer and, if you become its trainee, the traineeship itself. It is responsible for that processing under its own privacy information, and you can exercise your rights in respect of that processing directly with it.

Our Terms and Conditions for Traineeship Providers allow Traineeship Providers to use your application only for the selection for the traineeship you applied for, require them to keep it secure, and require them to delete the applications of candidates they do not select. Each traineeship listing on the ELSA Traineeships portal names the Traineeship Provider and its country and links to its privacy policy or website.

The ELSA Traineeships portal and Base44

The ELSA Traineeships portal (https://traineeships.elsa.org), through which Traineeship Specification Forms, applications and the selection of candidates are handled, 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 assess, score or select applications. Please do not include in your application information that is not needed for it, such as information about your health, religion or political opinions, or the numbers of your identity documents. Our CV and Upload Guidance on the ELSA Traineeships portal explains what to leave out.

Third-Country and International Organisation Transfers

It is 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, or of an agreement concluded in your interest, or for steps taken at your request before entering into it (Article 49(1)(b) and (c) GDPR). This concerns the verification of your application by your own Local and National Group of ELSA, and the sharing of your acceptance and contact details with the Hosting ELSA Group of a traineeship you chose, where these are located in a third country without an adequacy decision and have 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;
- Republic of Ecuador;
- 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 Traineeship Provider of a traineeship you apply for, or the ELSA Group that verifies your application or hosts you, is located; the country of each traineeship is shown in its listing on the ELSA Traineeships portal.

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

For Traineeship Providers located in a third country without an adequacy decision, the standard contractual clauses (Module One) are incorporated in our Terms and Conditions for Traineeship Providers. 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 unauthorised 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 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 defence 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 with 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