

Privacy Policy for Traineeship Providers

ELSA Traineeships 2026/2027 · contact persons and representatives of Traineeship Providers

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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 (first name and last name of the contact person)
- Contact information (e-mail address and phone number of the contact person)
- ELSA Activity (whether the contact person is an ELSA Alumnus or Alumna)
- Professional information (the organisation you represent)
- Traineeship offer (the details of your organisation and of the traineeship as stated in the Traineeship Specification Form: the name, description, type, address, city, country, phone number, e-mail address and website of the organisation, and the location, dates, duration, hours per week, number of trainees, educational, language and legal-skill requirements, payment and benefits, tasks and additional requirements of the traineeship; these are personal data only where the Traineeship Provider is a natural person)
- Partner vacancy (the contact e-mail address, organisation name and logo, and the details of the vacancy (title, type, description, requirements, location, duration, dates and how to apply) submitted through the "Submit a Vacancy" form; personal data only where they identify a person, such as a personal e-mail address)
- Traineeship Provider account (the login details of the account we create for your organisation in the ELSA Traineeships portal, and the assessment, selection and ranking of candidates submitted through it)

- Technical and usage data (login and account data; and 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 perform our Terms and Conditions for Traineeship Providers where the Traineeship Provider is itself a natural person, such as a sole practitioner
- To receive and review the Traineeship Specification Form, to verify that the traineeship offered meets the ELSA Traineeships quality standards, and to contact you about it
- To have the Traineeship Specification Form reviewed and approved by the Local and National Group of ELSA in your country and by ELSA International
- To publish and promote the traineeship offered by your organisation on the ELSA Traineeships portal and ELSA's social media
- To review the partner vacancies submitted through the ELSA Traineeships portal, publish them in the list of partner vacancies and contact you about them
- To create your organisation's account in the ELSA Traineeships portal and send you its login details
- To give your organisation access to the applications matched to its traineeship, and to receive its selection and ranking of candidates
- To inform the selected applicants of your organisation's offer and to put the trainee in contact with you through the Hosting ELSA Group
- To contact your organisation about offering traineeships in future cycles of ELSA Traineeships (Job Hunting)
- To answer your inquiries and provide support
- To create anonymous statistics on Traineeship Providers and placements, including the involvement of ELSA Alumni, 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 in connection with 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 Contact persons of Traineeship Providers who submit or are named in a Traineeship Specification Form or who use a Traineeship Provider account in the ELSA Traineeships portal, people who submit a partner vacancy through the ELSA Traineeships portal, and Traineeship Providers that are themselves natural persons, such as sole practitioners;

The Evaluation Form for Traineeship Providers, testimonials and the naming of supervisors on the certificates of trainees are covered by our separate Privacy Policy for Evaluation Form – Traineeship Providers, which is published on the ELSA Traineeships portal and linked in that form.

2 - Personal Data Collection

Categories of Personal Data Collected

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

- Personal identification (first name and last name of the contact person)
- Contact information (e-mail address and phone number of the contact person)
- ELSA Activity (whether the contact person is an ELSA Alumnus or Alumna)
- Professional information (the organisation you represent)
- Traineeship offer (the details of your organisation and of the traineeship as stated in the Traineeship Specification Form: the name, description, type, address, city, country, phone number, e-mail address and website of the organisation, and the location, dates, duration, hours per week, number of trainees, educational, language and legal-skill requirements, payment and benefits, tasks and additional requirements of the traineeship; these are personal data only where the Traineeship Provider is a natural person)
- Partner vacancy (the contact e-mail address, organisation name and logo, and the details of the vacancy (title, type, description, requirements, location, duration, dates and how to apply) submitted through the "Submit a Vacancy" form; personal data only where they identify a person, such as a personal e-mail address)
- Traineeship Provider account (the login details of the account we create for your organisation in the ELSA Traineeships portal, and the assessment, selection and ranking of candidates submitted through it)
- Technical and usage data (login and account data; and 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 without the essential personal data we may be unable to fulfil the contractual obligations between you and us in connection with ELSA Traineeships 2026/2027.

How we collect personal data

We collect personal data about you in different ways, as described within this privacy policy.

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

Direct Collection

- When you submit the Traineeship Specification Form (TSF) through the ELSA Traineeships portal (<https://traineeships.elsa.org>)
- When you log in to your organisation's account in the ELSA Traineeships portal and assess, select and rank candidates
- When you submit a partner vacancy through the "Submit a Vacancy" form of the ELSA Traineeships portal
- When you correspond with us, with the Local or National Group of ELSA in your country or with the Hosting ELSA Group
- Through your use of the ELSA Traineeships portal, which the Base44 platform records in its technical and usage logs

Indirect Collection

- From the Local or National Group of ELSA that contacted your organisation and submits or completes the Traineeship Specification Form on its behalf
- From a colleague at your organisation who names you as contact person in the Traineeship Specification 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 to fulfil the agreement between you and us. In particular, we rely on contractual obligations, to:	<ul style="list-style-type: none"> • To perform our Terms and Conditions for Traineeship Providers where the Traineeship Provider is itself a natural person, such as a sole practitioner
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 running ELSA Traineeships together with the organisations that offer traineeships through it: communicating with the person your organisation designates for that purpose, checking the quality of the traineeships offered, organising the selection of trainees with your organisation, inviting your organisation to future cycles, reporting on the programme in anonymous form, keeping the ELSA Traineeships portal secure, and establishing, exercising or defending legal claims. Our legitimate interests are, in particular to:	<ul style="list-style-type: none"> • To receive and review the Traineeship Specification Form, to verify that the traineeship offered meets the ELSA Traineeships quality standards, and to contact you about it • To have the Traineeship Specification Form reviewed and approved by the Local and National Group of ELSA in your country and by ELSA International • To publish and promote the traineeship offered by your organisation on the ELSA Traineeships portal and ELSA's social media • To review the partner vacancies submitted through the ELSA Traineeships portal, publish them in the list of partner vacancies and contact you about them • To create your organisation's account in the ELSA Traineeships portal and send you its login details • To give your organisation access to the applications matched to its traineeship, and to receive its selection and ranking of candidates

Legal basis	Purposes
	<ul style="list-style-type: none"> To inform the selected applicants of your organisation's offer and to put the trainee in contact with you through the Hosting ELSA Group To contact your organisation about offering traineeships in future cycles of ELSA Traineeships (Job Hunting) To answer your inquiries and provide support To create anonymous statistics on Traineeship Providers and placements, including the involvement of ELSA Alumni, 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:	<ul style="list-style-type: none"> 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.

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 Local and National Group of ELSA in your country, which help register your organisation and review its Traineeship Specification Form
- The Hosting ELSA Group (the Local and National Group of ELSA in the country of the traineeship), which receives the trainee and puts the trainee in contact with you
- Applicants selected by your organisation and trainees who accept its offer, who receive the name and contact details of the contact person
- 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)

Your organisation as an independent controller

When your organisation receives the applications matched to its traineeship, it processes the personal data of those applicants as an independent controller, under the Controller-to-Controller Data Sharing Terms in Annex 1 to our Terms and Conditions for Traineeship Providers. This Privacy Policy covers the personal data of the people who act for your organisation in ELSA Traineeships, and of Traineeship Providers that are themselves natural persons; it does not cover how your organisation processes the personal data of applicants and trainees.

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.

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 us and you, where you are yourself the Traineeship Provider (Article 49(1)(b) GDPR), or of the agreement between us and the Traineeship Provider you represent, which is concluded in your interest as its contact person (Article 49(1)(c) GDPR). This concerns sharing your name and contact details with the ELSA Groups and the trainee involved in your organisation's traineeship, where these are located in a third country without an adequacy decision and, for ELSA Groups, 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 you represent, the ELSA Group in your country, the Hosting ELSA Group or the trainee is located

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

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 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