Interreg Co-funded by the European Union

Romania - Hungary

MERIT

Medical Emergency Response Interregional Simulation Training Programme

ROHU00026 • Interreg VI-A Romania–Hungary

PRIVACY POLICY

AND PROCESSING OF PERSONAL DATA

In accordance with Regulation (EU) 2016/679 (GDPR)

Data Controller:	Association for Business Promotion in Romania (ABPR)
Address:	Oituz 2C, 417235 Diosig, Bihor County, Romania
Website:	https://rove.ro | https://meritproject.eu
GDPR Contact:	jozsef.gonczi@rove.ro | Tel: +40 744 910 596
Document version:	1.0 – 2025
Applicability:	Online platform meritproject.eu (registration module, initial assessment test, account administration)

The content of this material does not necessarily represent the official position of the European Union. (to be used by project beneficiaries, when the case.)

1. Introduction

The Association for Business Promotion in Romania (hereinafter referred to as "ABPR" or the "Controller"), as lead partner of the MERIT project (Medical Emergency Response Interregional Simulation Training Programme – ROHU00026), provides participants with access to the online platform meritproject.eu.

This Privacy Policy transparently and comprehensively describes how ABPR collects, uses, stores, protects, and, where applicable, transfers the personal data of individuals who access the platform, register, and participate in the initial assessment test, in accordance with:

- Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR);
- Law no. 190/2018 implementing Regulation (EU) 2016/679;
- Law no. 506/2004 regarding the processing of personal data and the protection of privacy in the electronic communications sector;
- Guidelines and decisions of the National Supervisory Authority for Personal Data Processing (ANSPDCP).

By completing the registration form and/or using the meritproject.eu platform, the user confirms that they have read, understood, and accepted the provisions of this Policy.

2. Data Controller

Attribute	Identification
Legal name	Association for Business Promotion in Romania
Acronym	ABPR
CIF / CUI	18261599
Registered office	Oituz 2C, 417235 Diosig, Bihor County, Romania
Legal representative	József Gönczi
GDPR contact email	jozsef.gonczi@rove.ro
Phone	+40 744 910 596
Project website	https://meritproject.eu

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Note: The University of Oradea (UO), the University of Debrecen (UD), and the University of Debrecen – Special Medical Rescue Team (DEKOM) are project partners and joint controllers within the meaning of Art. 26 GDPR exclusively for the technical training activities in which they are directly involved. The relationship between joint controllers is regulated through a partnership agreement.

3. Categories of Personal Data Processed

The meritproject.eu platform collects the following categories of personal data:

Data category	Specific fields	Purpose
Identification data	First name, Last name	Unique participant identification; issuance of certificates/documentation
Contact data	Email address (entered twice – confirmation)	Communication regarding registration status and course notifications
Access data	Username	Authentication and account management
Institutional data	Affiliated institution, city/locality, country	Eligibility verification (UO/UD students); project statistics reporting
Assessment data	Test answers, score obtained, number of attempts	Selection of eligible participants (minimum 70% threshold); course improvement
Technical data (metadata)	Date/time of access, IP address (session log)	Platform security, prevention of unauthorized access, technical troubleshooting

ABPR does not collect special categories of data (Art. 9 GDPR), such as health data, biometric data, ethnic origin, political opinions, or religious beliefs.

Password note: Passwords are stored exclusively in hashed (encrypted, irreversible) form and are not accessible to any ABPR employee.

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4. Purposes and Legal Bases of Processing (Art. 6 GDPR)

Purpose	Legal Basis	Details
Creation and administration of user account	Art. 6(1)(b) – Performance of a contract	Necessary for participation in the programme
Administration of initial assessment test and participant selection	Art. 6(1)(b) – Contract / Art. 6(1)(e) – Public interest task	Eligibility based on score ≥ 70%
Communication regarding application status and course activities	Art. 6(1)(b) – Contract	Operational emails, not marketing
Reporting to programme funder (Interreg / ERDF)	Art. 6(1)(c) – Legal obligation	Aggregated/anonymized data
Platform security and fraud prevention	Art. 6(1)(f) – Legitimate interest	Technical logs, IT infrastructure protection
Platform and curriculum improvement (anonymized data)	Art. 6(1)(f) – Legitimate interest	Aggregated statistics

ABPR does not process personal data for direct marketing or advertising purposes without explicit consent.

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5. Data Processing in the Context of Retesting

The platform allows users to retake the initial assessment test multiple times without numerical restrictions.

- Each attempt is recorded separately with a timestamp.
- Stored data include: score obtained, date and time, selected answers.
- Passing threshold: 70%. Access to the course is granted once this threshold is reached in at least one attempt.
- All attempts are stored exclusively for academic progress monitoring and project reporting.
- Individualized test data are not disclosed to third parties except where legally required.

Legal basis: Art. 6(1)(b) GDPR (contract performance) and Art. 6(1)(e) GDPR (public interest task – EU co-funded project).

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6. Recipients of Personal Data

Personal data may be disclosed strictly as necessary to:

Recipient	Category of data	Legal basis / Justification
University of Oradea (UO) and University of Debrecen (UD) – joint controllers	Eligibility data, test score, institutional affiliation	Art. 26 GDPR – Joint controllership agreement; necessary for course organization
DEKOM (Hungary) – joint controller	Minimum identification data of selected participants	Art. 26 GDPR – Joint controllership agreement; organization of the Hungarian module
Interreg Managing Authority – funder	Aggregated / anonymized data (number of participants, results)	Art. 6(1)(c) GDPR – Legal reporting obligation
Hosting provider / e-learning platform provider (data processor)	All categories of data stored on the server	Art. 28 GDPR – Data Processing Agreement (DPA) concluded with the provider
Public authorities (Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal, prosecutor's office, courts)	Data requested through legal procedures	Art. 6(1)(c) GDPR – Legal obligation or court order

ABPR does not sell, rent, or commercialize personal data to third parties.

7. Transfers Outside the EEA

The MERIT project involves collaboration with **Universitatea din Debrecen** and **DEKOM**, both located in Hungary, a Member State of the European Union and of the European Economic Area (EEA). Consequently, the exchange of data with these entities does not constitute a transfer outside the EEA and does not require additional safeguards pursuant to Chapter V of the GDPR.

ABPR does not transfer and does not intend to transfer personal data to third countries (outside the EEA) in connection with the activities of the meritproject.eu platform. Should such a transfer become necessary, ABPR will inform the data subjects and ensure appropriate safeguards (e.g., standard contractual clauses, adequacy decision, etc.).

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8. Data Retention Period

Data category	Retention period
User account data (name, email, username)	Until the completion of the MERIT project + 5 years (Interreg audit obligation); or until withdrawal of consent, whichever occurs earlier, provided this does not conflict with applicable legal retention obligations.
Test results and attempt history	Until the completion of the project + 5 years (audit documentation); aggregated and anonymized after this period.
Technical data (IP/logs)	Maximum 12 months from registration, followed by automatic deletion.
Aggregated reporting data	In accordance with Interreg regulations – minimum 3 years from the closure of the programme.

After expiration, data will be permanently deleted or irreversibly anonymized.

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9. Data Subject Rights

Under GDPR, individuals have the right to:

Right	Content
Right of access (Art. 15)	The right to obtain confirmation as to whether your personal data are being processed and to access a copy of such data.
Right to rectification (Art. 16)	The right to have inaccurate personal data corrected or incomplete data completed.
Right to erasure ("right to be forgotten") (Art. 17)	The right to request the deletion of personal data when they are no longer necessary, when consent has been withdrawn, or when processing is unlawful – subject to applicable legal retention obligations.
Right to restriction of processing (Art. 18)	The right to limit the processing of personal data in specific circumstances (e.g., when contesting the accuracy of the data).
Right to data portability (Art. 20)	The right to receive the personal data provided in a structured, commonly used, and machine-readable format, where processing is based on consent or a contract.
Right to object (Art. 21)	The right to object, at any time, to processing based on the legitimate interest of the controller, on grounds relating to your particular situation.
Right not to be subject to automated decision-making (Art. 22)	The platform does not make decisions producing legal effects based solely on automated processing (profiling). Selection based on the test score represents a predefined objective criterion and does not constitute automated profiling within the meaning of the GDPR.
Right to lodge a complaint (Art. 77)	The right to lodge a complaint with the **Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal**: www.dataprotection.ro | 28–30 G-ral. Gheorghe Magheru Blvd., District 1, 010336 Bucharest | Tel: +40 318 059 211.

9.1 Procedure for Exercising Data Subject Rights

Requests concerning the exercise of data subject rights may be submitted:

- By email to: jozsef.gonczi@rove.ro (with the subject line "GDPR Request – MERIT")
- By registered mail to: ABPR, Oituz 2C, 417235 Diosig, Bihor County, Romania

ABPR will respond within a maximum of 30 calendar days from receipt of the request. This period may be extended by an additional two months in cases justified by complexity, with prior notification of the applicant.

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The response is free of charge; however, in the case of manifestly unfounded or excessive (e.g., repetitive) requests, a reasonable administrative fee may be charged.

ABPR may request additional documentation to verify the identity of the applicant, in order to protect the personal data of other individuals.

10. Data Security

ABPR implements appropriate technical and organisational measures, in accordance with Article 32 of the Regulation (EU) 2016/679 (GDPR), to ensure a level of security appropriate to the risks associated with the processing of personal data and to prevent unauthorised access, loss, destruction, or accidental disclosure thereof.

For this purpose, the following measures are applied:

- Transmission of data via secure HTTPS protocol (TLS 1.2 / TLS 1.3) through an encrypted connection.
- Storage of passwords in hashed format (Bcrypt algorithm or equivalent), ensuring that they are not visible in plain text to any administrator.
- Restriction of data access strictly to authorised personnel, based on the “need-to-know” principle.
- Regular database backups, stored under secure conditions.
- Monitoring of suspicious activities and logging of access (log management).
- Conclusion of Data Processing Agreements (DPA) with all providers processing data on behalf of ABPR.
- Periodic training of personnel with responsibilities in the field of personal data protection.

No security measure can guarantee absolute protection. In the event of a security incident (breach) that may result in a high risk to the rights and freedoms of data subjects, ABPR will notify the affected individuals and the National Supervisory Authority for Personal Data Processing (ANSPDCP) within the time limits provided under Articles 33–34 of the Regulamentul (UE) 2016/679 (GDPR) (72 hours for notifying the authority).

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11. Cookies

The platform uses only essential technical cookies:

Cookie type	Duration	Purpose
Session cookie (session_id)	Session (deleted upon closing the browser)	Maintaining the login session while navigating the platform
CSRF cookie (csrf_token)	Session	Protection against Cross-Site Request Forgery (CSRF) attacks
Language preference cookie	30 days	Retaining the user's selected language preference (RO/HU/EN)

The platform DOES NOT use: analytics cookies (Google Analytics or equivalent), advertising cookies, social media cookies (Facebook Pixel, etc.), or any other third-party tracking technology.
Essential technical cookies do not require user consent, in accordance with Law no. 506/2004 and the ePrivacy Directive (Directive 2002/58/EC, as amended).

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12. Processing of Minors' Data

The MERIT training program is intended exclusively for students enrolled in the medical faculties of the University of Oradea or the University of Debrecen, as well as for practicing physicians. By the nature of the program, all participants are adults (minimum age 18).

ABPR does not intentionally collect data from individuals under the age of 18. If ABPR becomes aware that data from a minor has been collected without the consent of a parent or legal guardian, it will delete such data without delay.

13. Policy Updates

ABPR reserves the right to update this Privacy Policy, in particular as a result of legislative changes, new platform functionalities, or decisions of supervisory authorities.

The updated version will be published on meritproject.eu and will take effect on the date of publication. Users will be notified by email in the case of substantial changes. The date of the latest update is indicated at the beginning of the document.

Continued use of the platform after the updated version comes into effect constitutes implicit acceptance of the new provisions.

14. Contact and Supervisory Authority

14.1 Operator Contact

For any questions, requests, or complaints regarding the processing of your personal data:

Operator	Association for Business Promotion in Romania (ABPR)
GDPR contact person	József Gönczi
Email	jozsef.gonczi@rove.ro
Phone	+40 744 910 596
Address	Oituz 2C, 417235 Diosig, jud. Bihor, România
Email subject line	"GDPR request – MERIT meritproject.eu"

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14.2 National Supervisory Authority (ANSPDCP)

If you believe that your rights under the GDPR have been violated, you have the right to file a complaint with the competent authority:

Name	National Supervisory Authority for Personal Data Processing (ANSPDCP)
Website	www.dataprotection.ro
Email	anspdcp@dataprotection.ro
Phone	+40 318 059 211
Address	Bd. G-ral. Gheorghe Magheru 28-30, Sector 1, 010336 Bucureşti

This document has been drafted in accordance with Regulation (EU) 2016/679 (GDPR) and applicable Romanian legislation.
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