

## Information Clause for an Adult Beneficiary

### Information on the processing of personal data of the beneficiary of the project „Razem Możemy Więcej”

This information is provided in connection with participation in the project **„Razem Możemy Więcej” – professional activation, support for communication skills, and social integration of foreign nationals**, implemented under the Sectoral Activation Programme for Foreign Nationals for 2026.

#### Data Controller

The controller of your personal data is:

#### **Stowarzyszenie INTERKULTURALNI PL**

address: ul. Lwowska 2A/48, 30-548 Kraków

KRS: 0000368412

NIP: 6762430328

REGON: 121368522

e-mail: [\_\_\_\_\_]

website: [\_\_\_\_\_]

hereinafter referred to as: **„Association”** or **„Controller”**.

#### Contact regarding data protection matters

In matters concerning the processing of personal data and the exercise of rights related to data processing, you may contact the Association:

1. in writing, to the Association's registered office address,
2. by e-mail: [\_\_\_\_\_],
3. with the person responsible for data protection / the Data Protection Officer, if one has been appointed: [\_\_\_\_\_]

e-mail: [\_\_\_\_\_]

telephone: [\_\_\_\_\_]

#### Categories of data processed

The Association may process your personal data to the extent necessary for the recruitment, participation, administration, monitoring, evaluation, settlement, and inspection of the project, in particular:

1. identification data, such as first name, surname, date of birth, document number,
2. contact data, such as e-mail address, telephone number, address of residence or stay, if required,

3. data concerning citizenship, country of origin, or your status as a foreign national, to the extent required to confirm eligibility to participate in the project,
4. data concerning lawful residence in the territory of the Republic of Poland, to the extent required to confirm eligibility to participate in the project,
5. data concerning participation in the project, including the selected forms of support, courses, training sessions, workshops, consultations, events, attendance lists, examinations, certificates, confirmations of participation, and results,
6. data concerning education, qualifications, professional experience, employment situation, training needs, and the process of nostrification or recognition of qualifications, if the given form of support so requires,
7. data concerning special needs, accessibility, disability, or health condition, solely where necessary to ensure participation in the project, accessibility, or the appropriate adaptation of support,
8. data concerning the use of legal or psychological support, whereby the Association should process only information on the fact that such support was provided, without the content of the legal advice, diagnosis, details of the conversation, or documentation covered by professional secrecy,
9. data contained in evaluation surveys, interviews, forms, or information provided in connection with the assessment of the project's effectiveness,
10. image, statements, quotations, or a description of the participant's story, if separate consent is given for their use,
11. data necessary to settle travel costs, benefits, participation in examinations, or other costs, if the given form of support provides for this,
12. data related to communication with the Association and the project partners.

### **Purposes of data processing**

Your personal data will be processed for the following purposes:

1. conducting recruitment for the project,
2. verifying eligibility to participate in the project,
3. organizing and carrying out participation in the project, including courses, training sessions, advisory services, consultations, workshops, examinations, events, and other forms of support,
4. contact in organizational, technical, and substantive matters related to the project,
5. documenting participation in the project, including maintaining attendance lists, confirmations of participation, registers, statements, and project documentation,
6. ensuring accessibility and adapting forms of support to the special needs of participants, where applicable,
7. handling legal, psychological, advisory, translation, or assistance support, if the given form of support is provided,
8. monitoring the results of the project, including conducting evaluations, surveys, interviews, and quantitative and qualitative analyses,

9. preparing interim, final, and sustainability reports, as well as the Case Study, if required by the programme documentation,
10. settling the project and demonstrating the correct use of the funding,
11. providing data or documentation to the Ministry of Family, Labour and Social Policy to the extent required for monitoring, reporting, inspection, and settlement of the project,
12. archiving project documentation,
13. establishing, pursuing, or defending against claims,
14. carrying out informational and promotional activities for the project, to the extent that the individual concerned has given separate consent or to the extent that such activities do not require the processing of data identifying the participant.

### Legal bases for data processing

Your personal data will be processed on the following legal bases:

1. **Art. 6(1)(b) GDPR** - to the extent that the processing is necessary to take steps at your request prior to joining the project and to implement the rules of participation in the project,
2. **Art. 6(1)(c) GDPR** - to the extent that the processing is necessary for the fulfilment of the legal obligations incumbent on the Association as the project's implementing body, in particular obligations arising from the provisions on the implementation, financing, settlement, and inspection of a programme financed from public funds,
3. **Art. 6(1)(f) GDPR** - to the extent that the processing is necessary for the purposes of the legitimate interests pursued by the Association or another authorized entity, consisting in particular in:
  - a. organizing and properly managing the project,
  - b. documenting the course of the project,
  - c. ensuring the security and integrity of documentation,
  - d. conducting communication with participants,
  - e. protecting against abuse,
  - f. establishing, pursuing, or defending against claims,
4. **Art. 6(1)(a) GDPR** - solely to the extent that the processing is based on your separate consent, e.g., in the case of the use of image, statements, quotations, or the participant's story, or participation in optional promotional activities.

If, in connection with participation in the project, it becomes necessary to process special categories of personal data, including data concerning health, disability, or special needs, the Association will process such data only to the extent necessary and on the basis of explicit consent given by you in accordance with Art. 9(2)(a) GDPR.

### Legitimate interests

Where data are processed on the basis of Art. 6(1)(f) GDPR, the legitimate interest of the Association or another authorized entity consists in:

1. ensuring the proper organization and implementation of the project,

2. documenting the performance of project activities,
3. ensuring the quality, security, and continuity of the project,
4. conducting communication with participants,
5. protecting the Association's interests in the event of an inspection, audit, complaint, dispute, or claims,
6. preventing abuse and errors in project documentation.

### Recipients of data

Your personal data may be disclosed to the following recipients or categories of recipients, solely to the extent necessary to achieve the relevant purposes:

1. persons authorized by the Association to process data,
2. project partners, including:
  - a. Fundacji Wspierania Kultury i Języka Polskiego im. Mikołaja Reja (the Mikołaj Rej Foundation for the Promotion of Polish Culture and Language),
  - b. Gminie Miejskiej Kraków – Grodzkiemu Urzędowi Pracy (the Kraków Municipality – District Labour Office),
  - c. Międzynarodowemu Centrum Kształcenia Politechniki Krakowskiej (the International Centre for Education of the Cracow University of Technology),
  - d. Szkole Języka Polskiego „Accent School of Polish” Katarzyna Roś,to the extent that they participate in carrying out specific project activities,
3. persons conducting classes, courses, training sessions, workshops, consultations, advisory services, examinations, or events,
4. translators, intercultural assistants, advisors, psychologists, lawyers, trainers, and other persons involved in the implementation of the project, to the extent necessary for the performance of their tasks,
5. entities providing organizational, accounting, legal, IT, technical, hosting, or administrative support for the project,
6. the Ministry of Family, Labour and Social Policy, in connection with the monitoring, reporting, evaluation, inspection, and settlement of the project, and obligations arising from the programme documentation,
7. persons or entities carrying out inspections, audits, or verification activities concerning the project,
8. public authorities or other entities authorized to obtain data under the provisions of law.

In the ordinary course of reporting to the Ministry, data should be provided in pseudonymized form, in accordance with the adopted project model. Full identification data may be made available to the Ministry or to inspecting persons as part of an inspection, monitoring, or verification of the project documentation, if this is required under the programme documentation or the provisions of law.

## Transfer of data outside the European Economic Area

Under the assumptions adopted for the project, your personal data **will not be transferred outside the European Economic Area or to international organizations.**

The Association should ensure that partners and entities processing data under the project do not transfer data outside the European Economic Area and do not use AI tools to process participants' personal data, unless this is separately verified and regulated in accordance with the GDPR.

If data are to be transferred outside the European Economic Area, the Association will inform you of the recipient country and the basis and safeguards applied in accordance with the GDPR.

## Data retention period

Your personal data will be stored for the period necessary to:

1. conduct the recruitment,
2. carry out your participation in the project,
3. monitor, evaluate, and settle the project,
4. fulfil reporting, inspection, and archiving obligations,
5. establish, pursue, or defend against claims.

In accordance with the programme documentation, financial and substantive documentation related to the performance of the public task should be stored for a maximum period of **5 years, counted from the end of the calendar year in which the public task was performed**, unless a longer period results from provisions of law, inspection obligations, or the need to establish, pursue, or defend against claims.

The documentation will be stored for the following periods:

- for persons qualified for and participating in the project - project documentation: **5 years**,
- promotional data - until consent is withdrawn or the publication purpose is completed, retaining minimal evidentiary data, **but no longer than 5 years.**

Data processed on the basis of consent will be processed until the purpose for which the consent was given has been achieved, no longer than until the consent is withdrawn, unless further storage is necessary to demonstrate the correctness of the Association's actions or to defend against claims.

## Rights of the data subject

You have the following rights:

1. the right of access to personal data, including obtaining a copy of the data,
2. the right to rectification of data,
3. the right to erasure of data in the cases specified in the GDPR,
4. the right to restriction of processing,
5. the right to data portability, where applicable,

6. the right to object to processing based on Art. 6(1)(f) GDPR, on grounds relating to your particular situation,
7. the right to withdraw consent at any time, if data are processed on the basis of consent, whereby withdrawal of consent does not affect the lawfulness of processing carried out before its withdrawal,
8. the right to lodge a complaint with the supervisory authority.

The supervisory authority is:

**Prezes Urzędu Ochrony Danych Osobowych (President of the Personal Data Protection Office)**

ul. Stawki 2

00-193 Warszawa

### **Voluntary or mandatory nature of providing data**

Providing personal data is voluntary, but to the extent that data are required for recruitment, confirmation of eligibility, participation in the project, documentation of participation, and settlement and inspection of the project, it is necessary for participation in the project.

Failure to provide the required data may prevent participation in the project or the use of selected forms of support.

Providing optional data, in particular concerning image, statements, the participant's story, additional promotional materials, or optional forms of contact, is voluntary, and failure to provide it does not affect the possibility of participating in the project.

### **Automated decision-making and profiling**

Your personal data will not be used to make decisions based solely on automated processing, including profiling within the meaning of the GDPR.

Data may be used to assess eligibility, select appropriate forms of support, monitor results, or evaluate the project; however, these activities should be carried out with the involvement of persons responsible for implementing the project, and not solely automatically.