Information notice for adult beneficiaries

Information on the processing of personal data of beneficiaries of the ' : Together We Can Do More' (RMW) project

This information is provided in connection with our participation in the **'Together We Can Do More'** project – **vocational activation, support for communication skills and social integration of foreign nationals,** implemented as part of the Ministry's Activation Programme for Foreign Nationals for 2026.

Data controller

The controller of your personal data is:

Kraków City Council – Kraków Municipal Employment Office

address: 34 ul. Wąwozowa 34, 31-752 Kraków

Tax Identification Number (NIP): 6782748246

REGON: 357124926

Email: grodzki@gupkrakow.pl

website: https://gupkrakow.praca.gov.pl/

hereinafter referred to as: **'the Office'** or 'the **Controller'.**

Contact regarding personal data protection

For matters relating to the processing of personal data and the exercise of rights in connection with data processing, please contact the Office:

1. in writing to the address of the Office's registered office,
2. by email: iod@gupkrakow.pl,
3. with the Data Protection Officer: Mateusz Kęsek

   e-mail: kesek@gupkrakow.pl

   telephone: 12 68 68 220

Categories of data processed

The Office may process your personal data to the extent necessary for the recruitment, participation, administration, monitoring, evaluation, accounting and auditing of the project, in particular:

1. identifying details, such as first name, surname, date of birth, document number,
2. contact details, such as an email address, telephone number, home address or address of residence, where required,

3. information regarding your citizenship, country of origin or your status as a foreign national, to the extent required to confirm your 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 relating to participation in the project, including selected forms of support, courses, training sessions, workshops, consultations, events, attendance records, examinations, certificates, certificates of participation and outcomes,
6. information on education, qualifications, work experience, employment status, training needs, and the process of equivalence or recognition of qualifications, where the form of support in question so requires,
7. information relating to special needs, accessibility, disability or health, only where such information is necessary to ensure participation in the project, accessibility or appropriate adaptation of support,
8. data relating to the use of legal or psychological support, whereby the Office should process only information concerning the fact that such support was provided, excluding the content of legal advice, diagnoses, details of conversations or documentation covered by professional confidentiality,
9. data contained in evaluation questionnaires, interviews, forms or information provided in connection with the assessment of the project's effectiveness,
10. a participant's image, statements, quotations or description of their story, provided that separate consent has been given for their use,
11. data necessary for the settlement of travel expenses, benefits, examination fees or other costs, where the relevant form of support so provides,
12. data relating to communication with the Office and project partners.

Purposes of data processing

Your personal data will be processed for the following purposes:

1. conducting the recruitment process for the project,
2. verification of eligibility to participate in the project,
3. organising and delivering participation in the project, including courses, training sessions, advisory services, consultations, workshops, examinations, events and other forms of support,
4. contactacting with regards to organisational, technical and substantive matters relating to the project,
5. documenting participation in the project, including maintaining attendance lists, confirmation of attendance, registers, summaries and project documentation,
6. ensuring accessibility and tailoring forms of support to participants' specific needs, where applicable,
7. legal, psychological, advisory, translation or assistance services, where such support is provided,

8. monitoring project outcomes, including carrying out evaluations, surveys, interviews, and quantitative and qualitative analyses,
9. preparation of interim, final and sustainability reports, as well as a case study, where required by the programme documentation,
10. project final accounts and evidence of the proper use of the co-financing,
11. the provision of data or documentation to the Ministry of Family, Labour and Social Policy to the extent required for the monitoring, reporting, auditing and financial settlement of the project,
12. archiving of project documentation,
13. establishment, pursuit or defence against claims,
14. carrying out information and promotional activities relating to the project, to the extent that the individual has given separate consent or where such activities do not require the processing of data that identifies the participant.

Legal basis for data processing

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

1. **Article 6(1)(b) of the GDPR –** insofar as the processing is necessary to take steps at your request prior to entering into the project and to implement the rules governing participation in the project,
2. **Article Article 6(1)(c) of the GDPR –** to the extent that processing is necessary for compliance with a legal obligation to which the Office is subject as the Project Implementer, in particular obligations arising from provisions concerning the implementation, financing, accounting and control of a programme financed from public funds,
3. **Article 6(1)(f) of the GDPR –** in so far as processing is necessary for the purposes of the legitimate interests pursued by the Office or another authorised entity, consisting in particular of:
    a. organisation and proper project management,
    b. documenting the progress of the project,
    c. ensuring the security and integrity of the documentation,
    d. communicating with participants,
    e. protection against abuse,
    f. establishing, pursuing or defending against claims,
4. **Article 6(1)(a) of the GDPR** – solely to the extent that the processing is based on your separate consent, e.g. in the case of the use of your image, statements, quotations, participant stories or participation in optional promotional activities.

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

Legitimate interests

Where data is processed on the basis of Article 6(1)(f) of the GDPR, the legitimate interest of the Office or another authorised entity consists of:

1. ensuring the project is properly organised and implemented,
2. documenting the implementation of project activities,
3. ensuring the quality, safety and continuity of the project,
4. communicating with participants,
5. protecting the Office's interests in the event of an inspection, audit, complaint, dispute or claim,
6. preventing misuse and errors in project documentation.

Recipients of the data

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

1. persons authorised by the Office to process data,
2. project partners, including:
    a. The by Mikołaj Rej Foundation for the Promotion of Polish Culture and Language,
    b. The International Education Centre of the Kraków University of Technology,
    c. 'Accent School of Polish' Polish Language School, Katarzyna Roś,
    d. The INTERKULTURALNI PL Association,

    to the extent that they are involved in carrying out specific project activities,
3. people who run classes, courses, training sessions, workshops, consultations, advisory services, examinations or events,
4. translators, intercultural assistants, advisers, psychologists, lawyers, trainers and other persons involved in the implementation of the project, to the extent necessary for the performance of their duties,
5. entities providing organisational, accounting, legal, IT, technical, hosting or administrative services for the project,
6. The Ministry of Family, Labour and Social Policy, in connection with the monitoring, reporting, evaluation, audit and financial settlement of the project, as well as the obligations arising from the programme documentation,
7. persons or bodies carrying out inspections, audits or verification activities in relation to the project,
8. public authorities or other bodies authorised to obtain data in accordance with the law.

Under the standard reporting procedure to the Ministry, data should be submitted in pseudonymised form, in accordance with the approved project model. Full identification details

may be made available to the Ministry or to auditors in the course of an audit, monitoring or verification of project documentation, if required in accordance with the programme documentation or the relevant legislation.

Transfer of data outside the European Economic Area

In accordance with the project's terms and conditions, your personal data **will not be transferred outside the European Economic Area or to international organisations**.

The Office should ensure that partners and data processors involved in 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 is transferred outside the European Economic Area, the Office will inform you of the recipient country and the legal basis and safeguards applied in accordance with the GDPR.

Data retention period

Your personal data will be retained for as long as is necessary to:

1. to carry out the recruitment process,
2. to implement your participation in the project,
3. project monitoring, evaluation and accountability,
4. fulfilling reporting, monitoring and archiving obligations,
5. establishing, investigating or defending against claims.

In accordance with the programme documentation, the financial and substantive records relating to the implementation of a public task should be retained for a maximum period **of 5 years from the end of the calendar year in which the public task was carried out,** unless a longer period is required by law, audit obligations or the need to establish, investigate or defend against claims.

The documentation will be retained for the following period:

- for those who have been selected and are participating in the project – project documentation: **5 years**,
- promotional data – until consent is withdrawn or the purpose for which the data was published ceases to apply, whilst retaining the minimum necessary evidence, **but for no longer than 5 years**.

Data processed on the basis of consent will be processed until the purpose for which consent was given has been fulfilled, and no longer than until such time as consent is withdrawn, unless further retention is necessary to demonstrate the correctness of the Office's actions or to defend against claims.

The rights of the data subject

You have the following rights:

1. the right of access to personal data, including the right to obtain a copy of the data,
2. the right to rectification,
3. the right to erasure in the cases specified in the GDPR,
4. the right to restrict data processing,
5. the right to data portability, where applicable,
6. the right to object to the processing of your personal data based on Article 6(1)(f) of the GDPR, on grounds relating to your particular situation,
7. the right to withdraw consent at any time where data is processed on the basis of consent, whilst the withdrawal of consent does not affect the lawfulness of processing carried out prior to such withdrawal,
8. the right to lodge a complaint with the supervisory authority.

The supervisory body is:

Chair of the Office for Personal Data Protection

ul. Stawki 2

00-193 Warsaw

Whether the provision of data is voluntary or mandatory

The provision of personal data is voluntary; however, insofar as it relates to data required for recruitment, confirmation of eligibility, participation in the project, documentation of participation, project accounting and monitoring, it is essential for participation in the project.

Failure to provide the required information may prevent you from taking part in the project or from benefiting from the selected forms of support.

The provision of optional information, in particular regarding the participant's image, statements, background, additional promotional materials or optional contact details, is voluntary, and failure to provide such information does not affect the participant's ability to take part in the project.

Automated decision-making and profiling

Your personal data will not be used for decision-making based solely on automated processing, including profiling within the meaning of the GDPR.

The data may be used to assess eligibility, select appropriate forms of support, monitor outcomes or evaluate the project; however, these activities should be carried out with the involvement of those responsible for implementing the project, rather than solely by automated means.