

**EUROPEAN INSTITUTE OF  
RESEARCH AND MODERN  
STUDIES**

**PRIVACY POLICY**

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## Introduction

This Privacy Policy (hereinafter, the “Policy”) explains how EUROPEAN INSTITUTE OF RESEARCH AND MODERN STUDIES (hereinafter, the “Company”, “we” or “us”) collects and uses personal data obtained from its clients, employees, partners, website users.

In particular, the Policy describes which data we collect; why we collect those data; how we use and how long we store them; who we are sharing the data with; your rights regarding the use of the data.

## Section 1. Our Contact Details

- 1.1. EUROPEAN INSTITUTE OF RESEARCH AND MODERN STUDIES is a private limited company registered in the Republic of Estonia under registry code 16533218, having its registered office at: Tartu mnt 84, Soinaste küla, Kambja vald, Tartu maakond, 61709.
- 1.2. For any information regarding the Company and your personal data, please contact us by e-mail [admin@eurmost.org](mailto:admin@eurmost.org).

## Section 2. Categories of Personal Data

- 2.1. Depending on the purpose described in Section 3, we collect from you the following data:

N	Category of data	List of data
1	Identity data	first name, last name, personal identification code, information containing in the passport / ID card
2	Contact data	address, phone number, e-mail address
3	Professional data	your place of work and job title
4	Financial data	your bank account, payment card details
5	Cookies	IP address, device and browser type, geolocation, operating system, on-site activities to measure and report statistics about your interactions on our website
6	HR data	educational and professional background and other information provided by you in your CV

## Section 3. Purposes and Legal Basis for Data Processing

3.1. The table below describes purposes and lawful basis for using particular categories of personal data specified in Section 2.

N	Purpose for processing	Category of data	Lawful basis
1	Responding to your enquiries which you have sent to us via e-mail or contact form on our website, or told us in our personal conversation.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Services data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Performance of a contract</li> <li>✓ Legitimate interest (bringing in new clients)</li> </ul>
2	Concluding a contract with you.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Professional data</li> <li>✓ Financial data</li> <li>✓ Services data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Entering into a contract</li> </ul>
3	Managing our relationship with you, including notifying you of changes in the terms of studying.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Professional data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Performance of a contract</li> </ul>
4	Conducting payments.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Financial data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Performance of a contract</li> </ul>
5	Sending you via e-mail promotional letters, informational newsletters, news about the latest developments.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Professional data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Your consent (if we have not provided our services to you)</li> </ul>
6	Collecting statistical information on our website to understand what information is most relevant to website visitors and what content is mostly read.	<ul style="list-style-type: none"> <li>✓ Cookies (Google Analytics)</li> </ul>	<ul style="list-style-type: none"> <li>✓ Your consent</li> </ul>
7	Recruiting employees.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Professional data</li> <li>✓ HR data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Entering into a contract</li> <li>✓ Legitimate interest (to select individuals most suitable for a particular position)</li> </ul>
8	Accounting (according to law, we have to account for our service-related activities).	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Financial data</li> </ul>	<ul style="list-style-type: none"> <li>✓ Legal obligation.</li> </ul>

		✓ Services data	
9	Complying with instructions, orders and requests from law enforcement agencies, courts or other authorities as required by law.	<ul style="list-style-type: none"> <li>✓ Identity data</li> <li>✓ Contact data</li> <li>✓ Professional data</li> <li>✓ Financial data</li> <li>✓ Services data</li> <li>✓ HR data</li> </ul>	✓ Legal obligation.

- 3.2.** Where a lawful basis for data processing is “Performance of a contract” or “Entering into a contract”, you are not obliged to provide the personal data listed in the table. However, should you fail to provide your personal data listed in the table, we will not be able to respond to your enquiries, conclude a contract with you, as well as send you relevant legal updates, notify you of changes in the terms; conduct a payment. Should you fail to provide your personal data listed in point 7 of the table, we will not be able to call you for an interview and evaluate your candidacy for a job position.
- 3.3.** We will only use your personal data for the purposes for which we collected them as specified in the table above, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to receive an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the e-mail provided in clause 1.2.
- 3.4.** Your rights regarding the processing of personal data, including the right to forbid us to use your data, are set out in Section 9 of this Policy.

## Section 4. Cookies

- 4.1.** Cookies are text files containing small amounts of information which are sent to your browser and stored on your computer, mobile phone or other device when you visit a website. The cookies send information back to the website each time you return to the website. A cookie enables the website to remember your actions and preferences – such as your preferred language and display preferences - over a period of time, so you do not have to re-enter them when you return to the website.
- 4.2.** We collect the following cookies on our website:

Cookie name	Purpose	Retention period
_ga	It is used by Google Analytics to distinguish users, calculate visitors, evaluate their visit goals.	2 years
_gid		24 hours
_gat	It is used by Google Analytics to control the request rate made to Google Analytics.	1 minute

- 4.3.** We collect the above cookies by employing the Google Analytics tool. The Google Analytics tool places and uses cookies to track website traffic and users’ interaction

with our website. You can learn more about Google Analytics and information that this tool allows us to collect [here](#).

- 4.4. All the information collected by Google Analytics cookies is aggregated with similar information received from other users and is therefore anonymous. We do not identify individual visitors to our website.
- 4.5. You can accept, reject, manage or delete cookies according to your preferences.
- 4.6. Cookies are placed on your device only if you consent by choosing relevant option on the website's cookie banner. You can change your choice at any time by clicking on respective field on the cookie banner.
- 4.7. Unless you have set your browser to decline all or certain type of cookies, Google Analytics cookies will be issued to you as soon as you visit our website.
- 4.8. You can prevent Google from tracking and processing your personal data that are generated by the Google Analytics tool. If you don't want Google Analytics to be used in your browser, you can install the browser plugin available at the following [link](#).
- 4.9. You can also block or restrict cookies by changing the settings of your browser. How to do this is described below depending on which browser you use:

[Google Chrome](#)

[Mozilla Firefox](#)

[Opera](#)

[Internet Explorer](#)

[Safari](#)

## **Section 5. Source of Personal Data**

- 5.1. We collect your personal data through direct interactions when you (a) input your data on our website; (b) correspond with us by e-mail or other electronic means; (c) speak to us in person or over phone.
- 5.2. We also receive your personal data from third parties.
- 5.3. We also receive statistic data with cookies.
- 5.4. We also receive your personal data from publicly accessible sources, including from public registers, websites, other public sources like any services accessible on the Internet which you are using for professional networking purposes, e.g., LinkedIn.

## **Section 6. Recipients of Data**

- 6.1. Our employees have access to your personal data for the purposes laid down in Section 3.

- 6.2. In order to conduct payments, your financial data is transferred to banks or payment institutions.
- 6.3. When it is required for provision of our services to you, we transfer your personal data to respective parties, including state authorities or other official bodies, counterparties, and other persons.
- 6.4. Your personal data may be disclosed to state authorities when required by law.

## Section 7. Transfer Data to Third Countries

- 7.1. In principle, we do not transfer your personal data to countries outside the EU/EEA. However, in certain cases, we employ data processors located outside the EU/EEA.
- 7.2. As said in Section 4, we use the Google Analytics tool to collect statistical data which is listed in point 6 subsection 2.1 of this Policy. The provider is Google LLC registered in the U.S. Data collected by the Google Analytics is generally transmitted to a Google server in the U.S. and stored there.
- 7.3. **We draw your attention to the fact that there is no adequacy decision issued by the European Commission to the U.S., and your personal data are not protected in the U.S. in the same way as in the EU. Under certain circumstances, your access to effective legal protection may be restricted, and there is a risk that U.S. authorities may get the access to your data. Google relies on Standard Contractual Clauses for relevant data transfers. You can find Google Ads Data Processing Terms [here](#).**
- 7.4. The legal basis for data processing with help of the Google Analytics tool, and in particular transmission to the U.S. is your consent. You can always withdraw your consent at any time. The withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal. You can also prevent Google from tracking, or block cookies as said in this Policy.
- 7.5. We use Google Analytics with the IP address anonymisation option. This means that your IP address collected by the Google Analytics will be masked before it is transferred to the U.S. You can learn more about this IP anonymisation [here](#).

## Section 8. Retention Period

- 8.1. We store your personal data for five years from the end of the year in which the respective service was provided, unless otherwise is required by law.
- 8.2. Your personal data processed for the purpose of direct marketing will be stored for no longer than two years from the last communication with you, or until you forbid us to use your personal data for those purposes.
- 8.3. We will store the personal data you presented for staff selection purposes until the end of the selection and three months after if you have not got the job offer from us. If you are selected and sign a contract with us, we will process your personal data while you are working for us, and for no longer than one year after the termination

of your employment. Based on your consent such personal data may be stored longer.

- 8.4. Cookies are stored for a period indicated in subsection 4.2 of this Policy.
- 8.5. We take reasonable steps to ensure that outdated personal data is updated and data no longer required is deleted.

## Section 9. Your Rights

9.1. You have the following rights related to your personal data:

N	Rights	What does it mean?
1	Right to request access to your personal data	By contacting us, you can obtain information on which personal data of yours we are processing, the purpose of the processing, the recipients to whom the personal data have been transferred.
2	Right to rectification of your personal data	You can request that we correct any of your personal data if you believe that it is inaccurate or incomplete.
3	Right to erasure of your personal data	You can request that we erase your personal data if the data is no longer necessary for the purposes it was collected for, or if you believe that the processing is unlawful.
4	Right to restrict processing your personal data	You can 'block' or suppress further use of your personal data when we are assessing a request for rectification or as an alternative to erasure. When processing is restricted, we can still store your data, but cannot use it.
5	Right to object to processing your personal data	You can object to certain processing of your personal data, including for example, the processing of your personal data for direct marketing purposes or when we otherwise base our processing of your data on a legitimate interest. If you object to processing of your personal data, we are no longer able to process your data.
6	Right to withdraw your consent	In cases where the processing of your personal data is based on your consent, you can always withdraw your consent to any future processing, i.e., without



		affecting the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent by contacting us with a respective request at our e-mail address.
7	Right to opt out from direct marketing	You can always opt out (unsubscribe) from our direct marketing e-mails by contact us with a respective request.
8	Right to data portability	You have the right to receive your personal data in a structured, commonly used and machine-readable format and to have those data transmitted from one data controller to another.
9	Right to lodge a complaint	You can lodge a complaint with the Estonian Data Protection Inspectorate ( <a href="http://www.aki.ee/en">http://www.aki.ee/en</a> ).

**9.2.** If you wish to exercise your rights or have any questions about our processing of your personal data, please contact us at [admin@eurmost.org](mailto:admin@eurmost.org).