

Privacy Statement
“PULSE-ART” Self-Reflection tool

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: “PULSE-ART” Self-Reflection tool

Data Manager: FORTH

1. Introduction	1
2. Why and how do we process your personal data?	1
3. On what legal ground(s) do we process your personal data	2
4. Which personal data do we collect and further process?	2
5. Data processing/confidentiality	3
6. How do we protect and safeguard your personal data?	4
7. Who has access to your personal data and to whom is it disclosed?	4
8. What are your rights and how can you exercise them?	5
9. Contact Information	5

1. Introduction

This Self-Reflection tool has been created in the context of the project PULSE-ART – “Promoting Understanding and Lifelong learning Successful Education through the ARTs and culture”. PULSE-ART will produce compelling evidence illustrating the positive impact of arts in education for the enhancement of cultural expression and awareness (CAE). At the heart of this initiative lies the concept of integrating art, culture, and heritage institutions, including museums, galleries, cultural centres, and overall CCI, into the educational framework. This integration aims to effectively address the deficiencies of the educational system, hindering the improvement of CAE through the arts. Reference materials will be created and integrated into the Arts in Education for Cultural Awareness Observatory, including a Competency Framework, a Professional Development Programme, and a Self-Reflection tool, which will be validated and tested through 7 case studies in 7 countries using different art techniques with a lifelong learning perspective.

The project lasts 3 years (running from November 2024 to October 2027) and is funded by the European Commission (contract no. N° 101178988), within the context of the EU - Horizon Europe - RIA programme. There are ten (10) participating organizations from six (6) European countries, and in particular:

1. Science For Change (SFC),
2. Fundación Privada Instituto de Salud Global de Barcelona (ISGLOBAL),
3. Stichting Waag Society (Waag Society),
4. Educational Association Antalolia (EAA),
5. Foundation for Research and Technology Hellas (FORTH),
6. Museo Nacional de Ciencias Naturales (MNCN-CSIC),
7. Institut de recherche et d'innovation (IRI),
8. University of Malta (UM),
9. Euro Mediterranean Economist Association (EMEA),
10. Daugavpils University (DU)

More information can be found at the project website: <https://pulseartproject.eu/>

2. Why and how do we process your personal data?

Primary purpose

The primary purpose is to provide you with a self-reflection of your strengths and weaknesses as an educator or learner, to aid you in improving your skills, attitude, and knowledge for CAE (Cultural Awareness and Expression).

The self-reflection is structured around competencies, where each competency includes single-choice questions covering specific competency areas. There are 5 competency areas for educators and 4 competency areas for learners. Based on your answers, the system calculates a competence level for each competence and each competence cluster, e.g., 'Foundational', 'Intermediate', 'Advanced', 'Expert'.

Based on the achieved competence level in each competence and the specific answers relating to that competence, the system provides you with a list of feedback for improvement in each competence and possibly a list of recommended resources for learning and development, e.g., online courses, educational videos, articles, databases, or websites.

Research purposes

The second purpose is research using your input. You can opt in to the processing of your data for research. The research serves the following functions: testing and improvement of the Self-Reflection tool, testing and improvement of the underlying competence framework, training needs, PDP toolkit and validation of the effectiveness of case study activities. This application has been developed and is managed in-house by the FORTH team.

Types of tests based on context

The system supports two types of tests: individual tests and group tests.

- **Group tests:** There are tests that are performed in a group of users for a given activity, for enabling the computation of group results that will be exploited for the mentioned research purposes and especially for the activities related to the case studies of the project.
- **Individual tests:** They concern tests that are performed individually by the users.

Anonymised statistical data deriving from the tool can be shared, provided that the user gave his/her consent by accepting a relevant statement before going through the tool. This data can be used for the above mentioned research purposes.

At no time will individual responses from the educators/learners ever be shared or made public, or any aggregated data shared that might allow individual educators/learners to be identified.

3. On what legal ground(s) do we process your personal data

We process your personal data, because you have given your consent to the processing of your personal data for one or more specific purposes according to Article 6(1)(a) if regulation (EU) 2016/679 (GDPR). Participation of the data subjects is voluntary. No special categories of personal data are processed.

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the following categories of personal data are collected: user profile data, self-reflection data (including competence data and sociodemographic data, activity data and feedback data). In particular:

Registration data required for tool use ('user profile data'):

- Username
- Email address
- I declare that I have read and accept the privacy policy and I am **at least 16 years old.**
- User role information: educator, a learner, or both

We obtain this personal data from the registration. A user cannot register if he/she is under 16 years old, i.e., according to the GDPR, "Where point (a) of Article 6(1) applies, in relation to the offer of information society services directly to a child, the processing of the personal data of a child shall be lawful where the child is at least 16 years old."

Reflection data required to use the tool ('self-reflection/competence data'):

This refers to the answers of the user. The provision of this data is necessary to use the Self-Reflection tool. If you do not agree to provide this data, the tool cannot calculate your competence level or provide tips.

Personal data not required to use the tool ('self-reflection/socio-demographic data'):

- Gender
- Country of employment
- Age range
- Educational level
- Profession (Institution/Role)
- Living area

The provision of personal data is not mandatory, and a 'prefer not to say' option is always available. By providing this data, you help us make the Self-Reflection tool better and conduct further research.

Data not required to use the tool ('self-reflection/activity data'):

- Case Study
- Group Code
- Activity Code

This data concerns the group tests that can be done for a given activity of the PULSE ART project.

Before starting the test, the user is asked the following:

- Yes, I consent to sharing my answers, social demographic and activity data to this self-reflection for the research purposes mentioned above.
- No, I do NOT consent to sharing my answers, social demographic and activity data to this self-reflection for the research purposes mentioned above.

Data not required to use the tool ('feedback data'):

User feedback and opinion on the quality of the PULSE ART Self-Reflection tool. The provision of this data is not mandatory. By providing this data, you help us make the tool better and conduct further research.

5. Data processing/confidentiality

FORTH only keeps your data for the time necessary to fulfil the original purpose of collection or further processing. The data you provide will be anonymised and retained for the duration of this research project and any scientifically justified continuation or follow-up phase within the same research programme, in accordance with applicable legal requirements. The retention period will be at least five (5) years.

You have the right to request deletion of your data at any time; however, withdrawal may not be possible once your data has been anonymised and incorporated into ongoing research analyses.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) is stored on the servers of FORTH. In order to protect your personal data, FORTH has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the PULSE-ART consortium responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory and, when required, additional confidentiality agreements. In the case where a self-reflection is initiated for a group of educators/learners, the assigned group leader can have access to the aggregated anonymised data of the group, and only by the group participants who gave their consent (by accepting/rejecting a relative statement before going through the tool).

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

For Group Leaders

As a group leader, you are responsible for supervising or managing a group of participants in the PULSE-ART Self-Reflection tool. Your role may include facilitating group tests and reviewing aggregated results.

You may access aggregated anonymized data of participants only if they have explicitly consented to share their data. Individual responses are never shared and must not be attempted to be re-identified.

The data you access may only be used for the purposes of the PULSE-ART project, including the research purposes mentioned in this document.

You are strictly prohibited from using the data for personal, commercial, or any other purposes outside the project scope.

Your processing of aggregated participant data is governed by Regulation (EU) 2018/1725, Article 5(d), which requires transparency, accountability, and limitation of data use to the specific purpose for which consent was given. You must also comply with Chapter III (Articles 14-25) of the Regulation, which outlines the rights of data subjects and obligations of data processors.

You must maintain the confidentiality of all personal data and follow all technical and organizational measures implemented by FORTH to safeguard the data. This includes: (i) accessing data only via authorized accounts, (ii) not sharing data outside the project team and (iii) immediately reporting any suspected data breach to the Data Processor.

For Project Partners

The collection of personal data (such as contact details, including username, email) is strictly limited to purposes related to user management and communication by the data-processing partner (FORTH). Such identifiable data are not necessary for achieving the scientific and research objectives of the project and are not shared with other project partners.

Access by other partners is strictly limited to anonymised and/or aggregated data, as the research objectives of the project can be fully achieved without the use of identifiable information. Data processing by third parties has been designed from the outset to rely exclusively on data that do not permit the identification of natural persons, in compliance with the principles of data minimisation and purpose limitation under the GDPR.

Anonymisation is performed prior to any data transfer, using appropriate technical and organisational measures to ensure that re-identification of data subjects is not reasonably possible.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have consented to provide your personal data to FORTH for the present processing operation. You can withdraw your consent at any time by notifying the Data Processor. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Processor. Their contact information is given under Heading 9 below.

9. Contact Information

Data processor for the data collected during participation in the Self-Reflection tool

Foundation for Research and Technology Hellas (FORTH), N. Plastira 100, Vassilika Vouton, GR-700 13 Heraklion, Crete, Greece, email: pulse-art@ics.forth.gr

Key information about the Project

Project Coordinator: SFC, Spain

Funding Program: Horizon 2020

Website and contacts: <https://pulseartproject.eu/>