

## GDPR Privacy Policy for the ERUA Website

Managed by New Bulgarian University (NBU)

Last updated: 24.11.2025

### 1. Introduction

This Privacy Policy explains how the **European Reform University Alliance (ERUA)** website (“we”, “us”, “ERUA”) collects, uses, stores, and protects personal data in accordance with the EU General Data Protection Regulation (GDPR).

The website is operated and technically managed by **New Bulgarian University (NBU)** in its role as a partner institution within ERUA.

By using this website, you agree to the practices described in this Privacy Policy.

### 2. Data Controller

The Data Controller responsible for processing personal data on the ERUA website is:

**New Bulgarian University (NBU)**

21 Montevideo Blvd., 1618 Sofia, Bulgaria

Website: [www.nbu.bg](http://www.nbu.bg)

Email: [erua@nbu.bg](mailto:erua@nbu.bg) (ERUA Communication Team), [dpo@nbu.bg](mailto:dpo@nbu.bg) (Data Protection Officer)

If other ERUA partner institutions participate in specific initiatives, they may be joint controllers for the respective processing activities. In such cases, this will be explicitly indicated.

### 3. Categories of Personal Data We Collect

We may collect the following types of personal data when you visit the ERUA website:

#### 3.1. Data collected automatically (via cookies and analytics)

- IP address
- Browser type and operating system
- Device information
- Pages visited, date and time of access
- Referring URLs

#### 3.2. Data you provide voluntarily

When you fill out forms (newsletter subscription, event registration, contact form), we may collect:

- Name
- Email address
- Affiliation / institution
- Country or city
- Any other information you choose to submit

### 3.3. Data collected for the ERUA Newsletter

Specific details are provided in Section 7 below.

### 4. Purposes of Data Processing

We process personal data for the following purposes:

- To operate and maintain the ERUA website
- To improve website functionality and user experience
- To respond to user inquiries
- To register participants for events, seminars, and conferences
- To manage subscriptions to the ERUA electronic newsletter
- To prepare anonymized statistical reports
- To comply with legal or contractual obligations

We **do not** sell, share, or commercially exploit personal data.

### 5. Legal Bases for Processing

We process your data on the following legal grounds under GDPR:

- **Article 6(1)(a)** – Consent (e.g., newsletter subscription, analytics cookies)
- **Article 6(1)(b)** – Performance of a contract (e.g., event participation)
- **Article 6(1)(f)** – Legitimate interest (e.g., ensuring website security)
- **Article 6(1)(c)** – Compliance with legal obligations

### 6. Data Storage and Retention

- Personal data related to newsletter subscriptions is stored **until you unsubscribe**, or until the project ends.
- Event registration data is retained for **up to 3 years** for reporting and audit purposes unless required longer by project regulations.
- Contact form data is kept for **up to 12 months**.
- Cookie and analytics data are retained according to cookie durations, but never longer than **26 months**.

Data may be stored on secure servers owned or contracted by NBU or ERUA partner institutions.

### 7. Newsletter Subscription — Additional GDPR Information

When subscribing to the ERUA Newsletter, we collect the following personal data:

- **Email address** (mandatory)
- **Name** (optional)
- **Institution/affiliation** (optional)
- **Position** (optional)

### Purpose

To send periodic newsletters, updates about ERUA activities, opportunities, project results, and events.

### Legal basis

**Consent** under GDPR Article 6(1)(a).

You may withdraw your consent at any time by clicking the “unsubscribe” link in any newsletter or by contacting us at [erua@nbu.bg](mailto:erua@nbu.bg).

### Retention

Data is kept **until consent is withdrawn** or the newsletter service is discontinued.

### Third-party services

For distributing the newsletter, ERUA (through New Bulgarian University) uses Mailchimp, operated by **The Rocket Science Group LLC, Atlanta, GA, USA**.

Mailchimp acts as a data processor on behalf of New Bulgarian University in accordance with Article 28 GDPR.

Personal data is stored on Mailchimp’s secure servers. Mailchimp’s Privacy Policy and GDPR information are available on its website.

Mailchimp may transfer data outside the European Union. Such transfers are safeguarded by Standard Contractual Clauses (SCCs) approved by the European Commission, ensuring an adequate level of protection.

## 8. Sharing of Personal Data

We only share data in the following cases:

- With **ERUA partner universities** when necessary for joint events, reporting, or project coordination
- With **service providers** acting as data processors (e.g., website hosting, analytics, email delivery systems)
- With **EU funding authorities** for audit and reporting obligations
- When legally required (court, data protection authority)

All data processors are contracted with GDPR-compliant agreements.

## 9. Data Transfers Outside the EU

- If data is processed by third-party tools based outside the EU, we ensure appropriate safeguards such as **Standard Contractual Clauses (SCCs)** or **adequacy decisions**.
- Users will be informed of any such transfers in advance.

## 10. Your Rights Under GDPR

You have the right to:

- Access your personal data
- Rectify inaccurate data
- Request erasure (“right to be forgotten”)
- Restrict processing
- Object to processing
- Withdraw consent
- Request data portability
- Lodge a complaint with a supervisory authority

Supervisory authority in Bulgaria:

**Commission for Personal Data Protection (CPDP)**

Sofia 1592, 2 Prof. Tsvetan Lazarov Blvd.

Website: [www.cdpd.bg](http://www.cdpd.bg)

## 11. Data Security

We implement appropriate technical and organizational measures to protect personal data from:

- Unauthorized access
- Loss or theft
- Alteration
- Misuse or disclosure

These include secured servers, encrypted connections, access controls, and periodic audits.

## 12. Changes to This Privacy Policy

Updates may be made as required.

The “Last updated” date at the top indicates when changes were implemented.

## 13. Contact Information

For questions, concerns, or GDPR requests, please contact:

**ERUA Communication Team**

New Bulgarian University

Email: [erua@nbu.bg](mailto:erua@nbu.bg)