



## Customer information about the collection and processing of personal data in accordance with Art. 13 GDPR

Updated as of October 5, 2020

We take the protection of your personal data very seriously and it is our priority that you feel safe and comfortable in your business relationship with us. When processing personal data, it is important for us to take your privacy into account in all business processes. Personal data will be processed by us in accordance with the data protection regulations.

The responsible organization for processing your personal data is:

CEPA Customized Educational Programs Abroad GmbH  
Burgweg 24, 74379 Ingersheim, Germany  
Phone: +49 (0)71 42 95 65 11  
E-Mail: [privacy@cepa-abroad.org](mailto:privacy@cepa-abroad.org)

### You can contact our external data protection officer at:

D3 Datenschutz UG (limited liability)  
Nico Villing  
Keplerstraße 7, 74072 Heilbronn, Germany  
E-Mail: [privacy@cepa-abroad.org](mailto:privacy@cepa-abroad.org)

Your specified data for a request, the facilitation and execution of program arrangements, and the post-processing of our services will be used for execution with the contract already concluded or for the initiation of the contract. We process the following categories of personal data: address data, passport data, health-related data, and bank details for payment processing. The legality of the processing is derived from Art. 6 (1) b) GDPR.

The provision of personal data in the context of a **request** is necessary for the conclusion of a contract. There is no obligation to provide data, but you cannot purchase or use our services in this case. We process the data that you provide to us as part of our business relationship. The legality of the processing is derived from Art. 6 (1) b) GDPR. This includes in particular the following data:

- Contact information of the customer's contact person(s), e.g. title, name, organization, department, business address, professional telephone number, professional e-mail address

The recipients of your request within our company are the operations department, virtual learning division (if necessary), managers of other relevant departments, the administrative assistant, and the Executive Director.



The categories of external recipients for the collected data could be:

- Partner organizations in the respective destination countries
- Freelancers associated with CEPA
- IT service providers
- Public authorities when requesting this data on the basis of legal requests for information

The provision of further personal data after the proposal has been signed and returned is necessary for the **implementation of a study abroad program**. We process the data that you provide to us as part of our business relationship. The legality of the processing is derived from Art. 6 (1) b) GDPR. This includes in particular the following data:

- Contact information of the customer's contact person(s), e.g. title, name, organization, department, business address, professional telephone number, professional e-mail address
- Personal and contact information of the participants of the study abroad program, e.g. name, gender, nationality, telephone/mobile number, field of study
- Passport details of the participants of the study abroad program, e.g. birthday, nationality, passport number (if necessary)
- Information about dietary requirements and relevant health issues (if relevant for travels)
- Skype or Zoom ID (if necessary)
- IT data, e.g. IP-address (if necessary)
- Access rights to online learning platform (if necessary)
- Name and email address when submitting feedback (if applicable)
- Any other details corresponding to your travel arrangements (e.g. travel dates, requested services) or required by relevant service providers

The recipients of your personal data within our company are the operations department, virtual learning division (if necessary), managers of other relevant departments, the administrative assistant, and the Executive Director.

The categories of external recipients for the collected data could be:

- Freight forwarding and transport service providers
- Accommodation providers
- Cultural institutions
- Academic institutions and lecturers
- Companies and institutions
- Restaurants
- Coordinators/Cultural Ambassadors
- Insurance providers, e.g. CareMed
- IT service providers
- Partner organizations in the respective destination countries
- Freelancers associated with CEPA
- Online learning platform providers and associated platforms
- Public authorities when requesting this data on the basis of legal requests for information



The provision of personal data after the program has been concluded is necessary for the **post-processing of the program**. We process the data that you provide to us as part of our business relationship. The legality of the processing is derived from Art. 6 (1) b) GDPR. This includes in particular the following data:

- Personal and contact information of the customer's contact person(s), e.g. name, gender, organization, position, business address, telephone/mobile number (professional or personal), e-mail address (professional or personal)
- Used services or products

The recipients of your personal data within our company are the marketing and operations department, the administrative assistant, and the Executive Director.

The categories of external recipients for the collected data could be:

- Freelancers associated with CEPA
- Coordinators / Cultural Ambassadors
- IT service providers
- Partner organizations
- Customers (educational institutions)

The provision of personal data is necessary in the context of **accounting** during the whole business relationship. We process the data that you provide to us as part of our business relationship. The legality of the processing is derived from Art. 6 (1) b) GDPR. This includes in particular the following data:

- Personal and contact information of the customer, e.g. name, organization, department, address (professional or personal), e-mail address (professional or personal)
- Data for payment processing, e.g. bank account information, contract details, payment behavior
- Used services or product

The recipients of your personal data within our company are the accounting department, operations department, virtual learning division (if necessary), and the Executive Director.

The categories of external recipients for the collected data could be:

- Payment processing service providers, e.g. Flywire
- Banks, e.g. KSK Ludwigsburg, American Express
- Tax authorities
- Tax and business consultants
- Freelancers associated with CEPA
- Partner organizations



The provision of personal data is necessary in the context of **marketing and communication**, for the receipt of newsletters, features on social media and web analytics. We process the data that you provide to us as part of our business relationship. The legality of the processing is derived from Art. 6 (1) b) GDPR. This includes in particular the following data:

- Personal and contact information of the customer's contact person(s), e.g. name, gender, e-mail address (professional or personal), organization
- IT data, e.g. IP-address

The recipients of your personal data within our company are the marketing and operations department, and the Executive Director.

The categories of external recipients for the collected data could be:

- IT service providers
- Marketing platforms and services, e.g. Mailchimp, Hootsuite, Twitter, LinkedIn, Facebook
- Website host and programming interface, e.g. 1&1 IONOS SE, WordPress
- Freelancers associated with CEPA
- Partner organizations

The data required for processing, such as contact details or telephone numbers are stored for two years after the termination of the contractual relationship. This is used for the fulfilment of possible warranty or recourse claims.

Documents associated with the contract, such as invoices or reminders are stored in accordance with the statutory retention obligations of currently 10 years. The period begins at the end of the year in which the invoice was drawn up.

Personal data collected as part of the bidding process without subsequently being contracted will be deleted after six months.

You have the following rights in connection with the processing of your personal data:

- Pursuant to Art. 15 GDPR you have the right to access information on the data stored by us.
- Pursuant to Art. 16 GDPR you have the right to have incorrect data corrected.
- Pursuant to Art. 17 GDPR you have the right to have your data deleted, provided that there is no legal reason for further storage.
- Pursuant to Art. 18 GDPR you have the right to request a restriction on the processing of your personal data.
- Pursuant to Art. 20 GDPR you have the right to data portability regarding all data that you have provided to us.

To exercise these rights, please e-mail us at: [privacy@cepa-abroad.org](mailto:privacy@cepa-abroad.org)



Additionally, in accordance with Art. 21 GDPR, you have the right to enter an objection against the processing of your personal data, for a reason arising from your specific situation. We will stop processing your personal data unless we can demonstrate compelling and legitimate reason for the processing, that outweighs your interests, rights, and freedoms, or if the processing serves to assert, exercise or defend legal claims.

According to Art. 21 GDPR you also have the right to withdraw your consent given to us at any time. This has no impact on the legality of data processing in the past, based on your consent. A withdraw has no effect on data processing carried out based on Art. 6 (1) e) or f) GDPR or carried out for purposes of direct advertising. To exercise your right to object please e-mail us at: [privacy@cepa-abroad.org](mailto:privacy@cepa-abroad.org)

If you believe that we are in breach of the General Data Protection Regulation by processing your personal data, you have the right to complain to a supervisory authority. The supervisory authority responsible for us is:

Landesbeauftragter für Datenschutz und Informationssicherheit Baden-Württemberg  
Königstr. 10a  
70173 Stuttgart  
Germany