

## Privacy Policy – NewSteps

This Privacy Policy describes how the “NewSteps” website manages and processes personal data of users who browse the site and use its services.

### 1. Data Controller

The Data Controller is the NewSteps project, a European initiative aimed at supporting dancers in their professional transition and developing skills for the cultural and creative sector.

For any requests regarding the processing of personal data, users may contact the Data Controller through the contact details provided on the website.

### 2. Types of Data Collected

The website may collect the following categories of personal data:

Identification and contact data: name, email address (e.g. contact forms or newsletter subscription)

Voluntarily provided data: content included in messages sent by users

Browsing data: IP addresses, system logs, technical device information

Service usage data: access to the e-learning platform and training materials

### 3. Purpose of Data Processing

Personal data are processed for the following purposes:

Managing user requests submitted via contact forms

Providing access to website services, including training content and digital platforms

Sending updates and newsletters related to the project

Statistical analysis and website improvement

Compliance with legal and administrative obligations

### 4. Legal Basis for Processing

Data processing is based on:

the user's consent (e.g. newsletter subscription)

the performance of requested services

the legitimate interest of the Data Controller in improving services

legal obligations, where applicable

### 5. Processing Methods

Data are processed using electronic and digital tools, in accordance with the principles of lawfulness, fairness, and transparency, and with appropriate security measures to prevent unauthorized access, loss, or misuse.

## **6. Data Retention**

Personal data are retained only for as long as necessary to fulfill the purposes for which they were collected, and in particular:

- until consent is withdrawn (for newsletter purposes)
- for the time necessary to manage user requests
- in accordance with applicable legal requirements

## **7. Data Sharing and Disclosure**

Personal data will not be sold or publicly disclosed.  
They may be shared with:

- partners and organizations involved in the NewSteps project
- technical service providers (hosting, IT services, digital platforms)
- authorized entities where required by law

All parties process data in compliance with applicable data protection regulations.

## **8. Data Transfers**

Data may be processed within the European Economic Area (EEA).  
Any transfers outside the EEA will be carried out in compliance with GDPR safeguards.

## **9. Data Subject Rights**

Users have the right to:

- access their personal data
- request correction or deletion
- restrict or object to processing
- request data portability
- withdraw consent at any time
- lodge a complaint with a supervisory authority

## **10. Data Security**

The website implements appropriate technical and organizational measures to ensure the security of personal data and to protect them against unauthorized access, disclosure, or destruction.

## **11. Changes to this Privacy Policy**

This Privacy Policy may be updated over time.  
Users are encouraged to review it periodically.

## **12. Contact**

For any inquiries regarding this Privacy Policy or the processing of personal data, users may contact the Data Controller via the contact details provided on the website.