



PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Space Career Launchpad website (www.starseu.net/spacecareer)

Data Controller: European Commission, Directorate General for Defence Industry and Space, Unit for Innovation and New Space - Space Defence (hereafter DEFIS B.2).

Record reference: DPR-EC-27108.1

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1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to the processing operation “Space Career Launchpad Platform” undertaken by DEFIS B.2 and carried out by the data processor, Novaspace (Germany), as presented below.

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

Purpose of the processing operation: the Data Controller collects and processes your personal data to be able to provide the Space Career Launchpad Platform (hosted at starseu.spacecareer.net and its subpages and hereinafter referred to as ‘the Platform’) and to improve your experience on this Platform.

Participating to the Space Career Launchpad through the Platform:

The Data Controller processes your personal data shared through the registration, because you have accepted the Terms & Conditions before submitting the form, by clicking the relevant button on the form. These Terms & Conditions govern your registration and participation to the Space Career Launchpad and allow the Data Controller and its processor and the processor’s sub-processor to use this personal data for the purposes of contacting you, and to report on and improve the Space Career Launchpad.

Uploading your CV and applying for an Internship Voucher through the Platform:

As optional steps as an applicant, you can create a complete applicant profile and upload a resume for the purposes of employers contacting you. Finally, as a student who has signed an internship contract, you can apply for an Internship Voucher, which requires personal data to enable the selection process. That data may be used in aggregated and anonymised form for statistical purposes only to report about and improve the Space Career Launchpad. Your data will **not** be used for automated decision-making, including profiling.

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

This processing of your data is necessary for the management and functioning of the Commission, as mandated by the Treaties. Those provisions are, in particular, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union. Consequently, those processing operations are lawful under Article 5(1)(a) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body).

Furthermore, the promotion of information sharing is based on Article 108 (2) of Regulation (EU) 2021/696 of the European Parliament and of the Council of 28 April 2021 establishing the Space Programme of the Union and the European Union Agency for the Space Programme. The Regulation supports the dissemination and exploitation of space-related data and information, including promoting the societal benefits of the of the EU Space Programme components. The processing operations outlined in this privacy statement are also supported by Article 4.2 (f), Article 6.1 (d), and Article 6.1 (e) of Regulation (EU) 2021/696 of the European Parliament and of the Council of 28 April 2021 establishing the Space Programme of the Union and the European Union Agency for the Space Programme. These articles emphasize fostering the development of a strong Union

space economy, promoting entrepreneurship, innovation, and skills building across the Union, and fostering a business-friendly space ecosystem through cooperation among undertakings and provision of education and training activities. The processing of your personal data by the Data Controller is based on your explicit consent, obtained through a clear affirmative action by selecting the relevant checkbox on the Space Career Launchpad webpage.

The Data Controller also processes your personal data shared through the forms on the Platform:

Data subjects contacting the Space Career Launchpad through the Platform:

The Data Controller processes your personal data shared through the contact form, because you have given consent to the processing of your personal data, via a clear affirmative act, by checking the relevant box on the contact form.

The Platform may also collect personal data via cookies based on consent. More information about the cookies policy can be found [here](#).

Your consent for processing of your personal data for any of these purposes can be withdrawn at any time by contacting the STARS*EU team (info@starseu.net).

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

In order to carry out this processing operation, the Data Controller processes the following categories of personal data:

Contacting the Space Career Launchpad through the Platform:

- First name
- Last name
- E-Mail address

We obtain this personal data from you through the contact form on the Platform.

Registering and uploading resumes for the Space Career Launchpad through the Platform as Applicant:

We collect and process the following personal data of the Applicant when registering:

- E-Mail address
- Full name (optional)

As Applicant, when uploading a resume on the Platform, you can share the following optional personal information:

- Photo
- Personal summary
- Address
- Phone number

Applying for an Internship Voucher as Applicant:

We collect and process the following personal data of the Applicant when applying for the Internship Voucher:

- Full name
- E-Mail address

Registering and uploading jobs for the Space Career Launchpad through the Platform as Employer:

We collect and process the following (personal) data of the Employer when registering:

- E-Mail address

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the above-mentioned purposes. For each of the categories of personal data that is processed, please find below the retention details:

- Personal data provided through the contact form will be kept for a maximum of 2 years.
- Personal data provided through the registration process, application and uploads to facilitate the matchmaking will be kept for a maximum of 5 years.

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.) are stored on the servers of the European Commission or those of its contractors and their subcontractors (listed under Heading 7 below). All processing operations are carried out pursuant to [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors and their subcontractors (processors) are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679). These processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. 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 Commission staff responsible for carrying out this processing operation and to authorised Commission staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

The Data Controller will transmit your personal data to the processors mentioned below based on contracts pursuant to Article 29 of Regulation (EU) 2018/1725:

- Novaspace (Germany, STARS*EU consortium lead, coordinates all activities related to STARS*EU and the Space Career Launchpad, processor)
- Eurospace (France, STARS*EU consortium, implements and manages the website as well as the SaaS job board used for the Space Career Launchpad, sub-processor)
- SmartJobBoard (US, job board SaaS, supplies the actual SaaS software for the job board, sub-processor to Novaspace and works indirectly through Eurospace)

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

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.

Cookies

Cookies are short text files stored on a user’s device (such as a computer, tablet or phone) by a website. Cookies are used for the basic technical functioning of a website (necessary cookies), to store preferences (preferences cookies), or for gathering statistics (statistics cookies).

The cookies employed by the Commission’s contractors on your device for that purpose are covered by the cookie policy of the Space Career Launchpad Platform, available in the footer of any page.

When you visit the [Platform](#), we will keep the browser history of your visit for a maximum of 24 months. This information will then be deleted. The collection, aggregation and anonymising operations are performed under adequate security measures.

Cookies are stored by the Commission’s contractors on your device only after prior explicit consent and measure the effectiveness and efficiency of the Platform.

Enabling these cookies is not strictly necessary for the Platform to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the event Platform may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission’s control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the Space Career Launchpad programme through widely used communication channels, including social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

In order to protect your privacy, our use of third-party IT tools to connect to those services does not set cookies when our Platform pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other Platform. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our Platforms, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

The use of a third-party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

Google analytics

Google analytics is a data analytics tool, and all the Platform’s collected data is processed on it. customers use tags on web pages and an SDK for mobile apps to enable Google measurement products. The measurement data collected helps customers understand their users’ needs and, optionally, personalize the user experience and offer relevant advertising.

Google tags and the SDK use cookies and app instance IDs, respectively, to measure user interaction. While these identifiers provide information about user behavior, Google prohibits customers from sending Personally Identifiable Information to Google Analytics.

Data processing is protected under a Data Processing Agreement (DPA). Smart Job Board can demonstrate and provide sufficient guarantees on a confidential basis as to the implementation of appropriate technical and organisational measures taken to ensure data security and protection including;

- a) Continued adherence to best practices relating to data security as described in the Smart Job Board Information Security Policy.
- b) Appointment of a Data Protection Officer and adherence to all industry best practices and data protection laws and principals.

Amazon Web Services, Inc.

Amazon Web Services, Inc. (AWS), a subsidiary of Amazon, provides on-demand cloud computing platforms and APIs to individuals, companies, and governments. The Space

Career Launchpad Platform is hosted on AWS servers located in Ireland. As a result, all data collected and processed on the Platform is stored and managed within the AWS infrastructure.

Data processing on AWS is protected under a Data Processing Agreement (DPA) to ensure compliance with GDPR requirements. AWS implements robust security measures to safeguard data, including encryption, access controls, and regular security assessments.

The Commission ensures that appropriate contractual arrangements are in place with AWS to govern the processing of personal data and maintain data protection standards. This includes adherence to GDPR principles and provisions for cross-border data transfers.

By hosting data on AWS servers, the Commission aims to provide a secure and reliable environment for processing personal data while complying with legal and regulatory obligations.

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 the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

You have consented to provide your personal data to the data controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller writing to defis-b2@ec.europa.eu. The withdrawal of your consent 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 Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

9. Contact Information

The Data Controller

In case you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, European Commission, e-mail: defis-b2@ec.europa.eu.

The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>. This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-27108.1