

PRIVACY POLICY

Last Update: 5 October 2026

Preamble

With the following Privacy Policy, we would like to inform you about the types of personal data that we process, the purposes for which we process such data, the legal bases for processing and the rights you have under applicable data protection legislation.

This Privacy Policy applies to the processing of personal data in connection with the **VET-Caucasus Digital Hub** website available at <https://www.vetdigitalhub.com/>, including its Digital Learning Hub, Resource Centre, News & Events pages, contact forms and other online services and functionalities provided through the website (collectively referred to as the “Online Services”).

The VET-Caucasus Digital Hub is developed and operated in the framework of the **VET-Caucasus project**, funded by the European Union under the Erasmus+ Capacity Building in Vocational Education and Training (CB-VET) programme.

Project reference: **101242599 – VET Caucasus – ERASMUS-EDU-2025-CB-VET**

The terms used in this Privacy Policy are not gender-specific.

1. Controller

The VET-Caucasus Digital Hub is operated in the framework of the VET-Caucasus consortium.

Project Coordinator / Controller:

RISEBA University of Applied Sciences VICTORIA

Meža iela 3

Riga, LV-1048

Latvia

E-mail: vetcaucasus@riseba.lv

For general questions concerning the VET-Caucasus project or the Digital Hub, you may also contact the project coordination team through the contact details provided on the website.

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The VET-Caucasus project is coordinated by RISEBA University of Applied Sciences VICTORIA (Latvia). The website identifies RISEBA as the Project Coordinator and provides the project contact email vetcaucasus@riseba.lv.

Data Protection Contact:

For privacy and data protection inquiries, please contact:

vetcaucasus@riseba.lv

Where a Data Protection Officer has been formally designated for the processing covered by this Privacy Policy, the relevant contact details will be provided here.

2. The VET-Caucasus Project

VET-Caucasus is an Erasmus+ Capacity Building in Vocational Education and Training project aimed at enhancing the relevance, quality and responsiveness of vocational education and training institutions in Armenia and Georgia.

The project supports VET institutions and systems by strengthening their capacities in areas including management, quality assurance, innovation, training development, cooperation with the world of work, capacity building and dissemination.

The VET Digital Hub provides a central online environment for sharing educational resources, training materials, project information, news, events and other digital content developed in the framework of the project.

The project website identifies the following project partners:

- RISEBA University of Applied Sciences VICTORIA, Latvia;
 - Armenian State University of Economics, Armenia;
 - Yerevan State College of Informatics, Armenia;
 - Business and Technology University LLC, Georgia;
 - Construction College Construct 2, Georgia;
 - Institut de Haute Formation aux Politiques Communautaires (IHF), Belgium;
 - IDP SAS di Giancarlo Costantino / IDP European Consultants, Italy.
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3. Overview of Processing Operations

The following provides an overview of the categories of personal data, data subjects and purposes of processing.

Categories of Personal Data

Depending on how you use the Online Services, we may process:

- **Contact data**, such as name, surname and email address;
- **Communication data**, such as messages submitted through contact forms;
- **Content data**, such as information, comments, photographs or other content voluntarily submitted by users;
- **Usage data**, such as pages visited, access times and interactions with the website;
- **Technical and metadata**, such as IP address, browser type, operating system, device information and referring URL;
- **Cookie and similar technology data**, depending on the user's consent and browser settings;
- **Event and interaction data**, where relevant to integrated third-party services such as social-media functions.

We only process personal data to the extent necessary for the purposes described in this Privacy Policy or as otherwise permitted by applicable law.

Categories of Data Subjects

The processing may concern:

- Website visitors;
- Users of the Digital Learning Hub;
- Users of the Resource Centre;
- Persons contacting the project team;
- Project stakeholders;

- Event participants and interested persons;
- Representatives of partner organisations;
- Communication partners.

Purposes of Processing

Personal data may be processed for the following purposes:

- Provision and operation of the Online Services;
- Provision of educational and project-related information and resources;
- Communication with users;
- Responding to inquiries and contact requests;
- Organisation and communication concerning project activities and events;
- Website security and technical administration;
- Website analytics and improvement;
- Management of cookies and user preferences;
- Dissemination and communication of project results;
- Compliance with legal obligations;
- Protection against misuse, abuse or security incidents.

4. Legal Bases for Processing

We process personal data on the basis of the legal grounds provided by the General Data Protection Regulation (GDPR), in particular:

Consent – Article 6(1)(a) GDPR

Where we ask you for consent to process personal data, your data will be processed on the basis of your freely given, specific, informed and unambiguous consent.

You may withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing carried out before the withdrawal.

Performance of a Contract or Pre-contractual Measures – Article 6(1)(b) GDPR

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Where processing is necessary for the performance of a contract or for taking steps at your request prior to entering into a contract, processing may be based on Article 6(1)(b) GDPR.

Legal Obligation – Article 6(1)(c) GDPR

Where processing is necessary to comply with a legal obligation to which the controller is subject, the processing is based on Article 6(1)(c) GDPR.

Legitimate Interests – Article 6(1)(f) GDPR

Where processing is necessary for legitimate interests pursued by the controller or a third party, processing may be based on Article 6(1)(f) GDPR, provided that these interests are not overridden by the interests or fundamental rights and freedoms of the data subject.

Examples may include website security, prevention of abuse, technical administration and improvement of the Online Services.

5. Security Measures

We take appropriate technical and organisational measures to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

The measures include, where appropriate:

- Protection against unauthorised access;
- Access control and authentication;
- Secure transmission of data;
- Appropriate organisational access restrictions;
- Regular review of technical and organisational security measures;
- Procedures for responding to data protection and security incidents.

The website uses HTTPS/SSL encryption to protect data transmitted between the user's browser and the website.

However, no transmission or storage system can be guaranteed to be completely secure.

6. Transmission of Personal Data

In the course of operating the VET-Caucasus Digital Hub, personal data may be processed by service providers that provide technical, hosting, website, communication, analytics or other services necessary for operating the Online Services.

Where third-party service providers process personal data on our behalf, appropriate contractual and organisational safeguards will be applied in accordance with applicable data protection legislation.

We do not sell personal data to third parties.

Personal data may also be disclosed where required by law, necessary to protect our legal rights, or necessary to protect the security of the Online Services or other persons.

7. Data Processing in Third Countries

Some third-party service providers used in connection with the Online Services may process data outside the European Union (EU) or European Economic Area (EEA).

Where personal data is transferred to a third country, such transfer will be carried out in accordance with Articles 44–49 GDPR.

Depending on the circumstances, transfers may be based on:

- an adequacy decision of the European Commission;
 - Standard Contractual Clauses adopted by the European Commission;
 - other appropriate safeguards recognised under the GDPR; or
 - the user's explicit consent where legally applicable.
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8. Cookies and Similar Technologies

The VET Digital Hub may use cookies and similar technologies.

Cookies are small files stored on a user's device that can contain information about the use of a website. They may be used for purposes such as:

- Essential website functionality;

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- Security;
- Remembering user preferences;
- Website analytics;
- Measuring website usage;
- Improving the performance and usability of the Online Services.

Where required by law, non-essential cookies will only be used after obtaining the user's consent.

Users may withdraw or modify their consent at any time through the cookie settings provided on the website.

Users may also manage or disable cookies through their browser settings. Disabling certain cookies may affect the functionality of the website.

9. Website Hosting

The VET Digital Hub website is hosted using the **Wix** website platform.

The website provider may process technical information necessary to provide, secure and maintain the website. This may include IP addresses, browser information, device information, access times and other technical data generated when users access the website.

Wix may also use cookies and similar technologies in accordance with applicable law and its own privacy documentation.

Service provider: Wix.com Ltd.

The applicable privacy information of Wix should be consulted for further information concerning its processing of personal data.

10. Server Log Files

Whenever the website is accessed, technical information may be automatically collected and stored in server log files.

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Depending on the configuration of the hosting environment, this information may include:

- IP address;
- Date and time of access;
- Website or file accessed;
- Amount of data transferred;
- Browser type and version;
- Operating system;
- Referring URL;
- Information concerning successful or unsuccessful access.

Server log files may be processed for security, technical administration, troubleshooting and protection against misuse, including attempts to overload or attack the website.

Log data will be deleted or anonymised when it is no longer required for the relevant purpose, unless longer retention is required by law or is necessary for the establishment, exercise or defence of legal claims.

11. Contact Forms and Communication

The website provides contact functionality through which users may voluntarily provide information such as their:

- Name;
- Surname;
- Email address;
- Message or other information included in the inquiry.

We process this information in order to respond to inquiries, provide requested information and manage communication with users.

The legal basis may be:

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- Article 6(1)(b) GDPR where the inquiry relates to taking steps at the user's request prior to entering into a contractual relationship;
- Article 6(1)(f) GDPR where processing is necessary for our legitimate interest in responding to inquiries and maintaining project communication; or
- Article 6(1)(a) GDPR where consent is required and obtained.

Personal data submitted through contact forms will be retained only for as long as necessary to process the inquiry and for any subsequent communication, unless longer retention is required by law or justified for the establishment, exercise or defence of legal claims.

12. Digital Learning Hub and Resource Centre

The VET Digital Hub provides access to educational resources, training materials, project outputs and other digital content.

Where users access publicly available educational materials without registering or submitting personal information, the use of such resources generally does not require the collection of additional personal data beyond technical information automatically generated during website access.

If specific features of the Digital Learning Hub require registration, account creation or submission of personal information, users will be informed about the applicable processing at the relevant point of collection.

13. News, Events and Project Dissemination

The VET-Caucasus project includes communication, dissemination and sustainability activities.

Information about project activities, meetings, training sessions, events and project results may be published on the website and through associated communication channels.

Where photographs, videos, names, professional positions or other identifiable information of participants are used for dissemination purposes, such processing will be carried out in accordance with applicable data protection and, where relevant, image rights legislation.

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Where consent is required, consent will be obtained before publication.

14. Social Media and External Online Presences

The VET-Caucasus project may maintain or link to social-media profiles and other external online presences.

When users interact with these services, their personal data may be processed by the respective service providers. Such providers may process data for their own purposes, including analytics, communication and advertising.

We recommend that users review the privacy policies of the relevant social-media providers.

Where social-media content or plugins are embedded into the VET Digital Hub website, the relevant third-party provider may receive technical information, including the user's IP address, in order to provide the embedded content or functionality.

Where required by law, such third-party content will only be activated after the user's consent.

15. Embedded Content and Third-Party Services

The website may include content or functionality provided by third parties, such as:

- Videos;
- Social-media content;
- Maps;
- External links;
- Other embedded content or digital services.

When users access or interact with such content, the respective provider may process personal data, including technical information such as IP address and device information.

We aim to integrate third-party services in a manner consistent with applicable data protection requirements.

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Third-party providers are responsible for their own processing activities and their own privacy policies.

16. Web Analytics

We may use website analytics tools to understand how visitors use the VET Digital Hub and to improve the website.

Analytics information may include:

- Pages visited;
- Duration of visits;
- Access times;
- Referring websites;
- Device and browser information;
- Approximate location information;
- Interactions with website content;
- Technical identifiers and IP addresses.

Where analytics services require consent under applicable law, they will only be activated after the user has provided the relevant consent.

Where possible, appropriate measures such as IP anonymisation or pseudonymisation may be used.

17. Direct Marketing and Electronic Communications

The VET-Caucasus project may use electronic communication for project-related information, news, events and dissemination activities.

Where newsletters or other direct marketing communications are sent on the basis of consent, recipients may withdraw their consent at any time.

Each newsletter or promotional communication will provide an appropriate mechanism for unsubscribing where required by applicable law.

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Withdrawal of consent does not affect the lawfulness of processing carried out before withdrawal.

18. Retention of Personal Data

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, unless a longer retention period is required by law or is necessary for the establishment, exercise or defence of legal claims.

The retention period depends on:

- The purpose for which the information was collected;
- The type of personal data;
- Applicable legal and contractual obligations;
- Project documentation and reporting requirements;
- Any applicable limitation periods.

Personal data that is no longer necessary will be deleted or anonymised.

19. Your Rights Under the GDPR

As a data subject, you have various rights under the GDPR, including:

Right of Access – Article 15 GDPR

You have the right to request confirmation as to whether personal data concerning you is being processed and, where applicable, to obtain access to that data and additional information about its processing.

Right to Rectification – Article 16 GDPR

You have the right to request correction of inaccurate personal data and completion of incomplete personal data.

Right to Erasure – Article 17 GDPR

You may request deletion of your personal data where the conditions of Article 17 GDPR are met.

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Right to Restriction of Processing – Article 18 GDPR

You may request restriction of processing in circumstances specified by Article 18 GDPR.

Right to Data Portability – Article 20 GDPR

Where applicable, you have the right to receive personal data that you have provided to us in a structured, commonly used and machine-readable format and to transmit that data to another controller.

Right to Object – Article 21 GDPR

Where processing is based on Article 6(1)(e) or Article 6(1)(f) GDPR, you may object to the processing on grounds relating to your particular situation.

Where personal data is processed for direct marketing purposes, you may object to such processing at any time.

Right to Withdraw Consent

Where processing is based on consent, you may withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

20. How to Exercise Your Rights

To exercise your data protection rights, please contact:

VET-Caucasus Project Coordination

RISEBA University of Applied Sciences VICTORIA

Meža iela 3

Riga, LV-1048

Latvia

Email: vetcaucasus@riseba.lv

When submitting a request, please provide sufficient information to enable us to identify the relevant personal data and process your request.

We may need to verify your identity where this is necessary to protect personal data against unauthorised disclosure.

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21. Right to Lodge a Complaint

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a competent data protection supervisory authority if you believe that the processing of your personal data infringes applicable data protection law.

You may particularly contact the supervisory authority in the EU Member State of your habitual residence, place of work or place where the alleged infringement occurred.

22. Children's Data

The VET Digital Hub is intended primarily for professional, educational and institutional audiences.

We do not knowingly collect personal data from children for purposes that are not permitted under applicable law.

Where the processing of children's personal data is subject to specific consent or other legal requirements, we will comply with those requirements.

23. Changes and Updates to this Privacy Policy

We may update this Privacy Policy from time to time in order to reflect:

- Changes to the VET Digital Hub;
- Changes in the VET-Caucasus project;
- Changes in the services or third-party providers used;
- Changes in applicable legislation;
- Changes in our data processing practices.

The current version will be published on the VET Digital Hub website.

We recommend that users review this Privacy Policy periodically.

The date of the latest update is indicated at the beginning of this document.

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24. Contact Information

For questions concerning this Privacy Policy or the processing of personal data in connection with the VET-Caucasus Digital Hub, please contact:

RISEBA University of Applied Sciences VICTORIA

Meža iela 3

Riga, LV-1048

Latvia

Project: VET-Caucasus

Project Reference: 101242599

Email: vetcaucasus@riseba.lv

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The project website states that the views and opinions expressed are those of the authors and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency.

25. Definitions

Controller

“Controller” means the natural or legal person, public authority, agency or other body which determines the purposes and means of the processing of personal data.

Personal Data

“Personal data” means any information relating to an identified or identifiable natural person.

Processing

“Processing” means any operation performed on personal data, including collection, recording, organisation, storage, alteration, retrieval, use, disclosure, transmission or deletion.

Consent

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“Consent” means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which the data subject signifies agreement to the processing of personal data.

Cookies

Cookies are small files or similar technologies used to store information on or retrieve information from a user's device.

Pseudonymisation

Pseudonymisation means processing personal data in such a way that the data can no longer be attributed to a specific person without the use of additional information, where that additional information is kept separately and protected.

GDPR

“GDPR” means Regulation (EU) 2016/679 of the European Parliament and of the Council – the General Data Protection Regulation.

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