



GDPR PRIVACY POLICY

Health Education for Advanced Learning in Digital Healthcare

heald-project-eu.org

Version 1.0 | May 2026 | EU-Funded Project

Data Controller — Website Operator

UET — European University of Tirana (Universiteti European i Tiranës) Rr. Komuna e Parisit, Tirana, Albania Phone: +355 4 2274 881 | Email: info@uet.edu.al Website: <https://heald-project-eu.org/>

Regulatory Framework

This Privacy Policy is issued in compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation — GDPR), Albanian Law No. 9887 on Personal Data Protection (as amended), and the applicable national data protection laws of all partner countries. As an EU candidate country, Albania has substantially aligned its data protection legislation with the GDPR.

1. Introduction and Scope

The HEAL-D project (Health Education for Advanced Learning in Digital Healthcare) is an EU-funded strategic partnership under the Erasmus+ programme. This Privacy Policy describes how HEAL-D collects, uses, stores, and protects personal data in connection with the operation of the website <https://heald-project-eu.org/> and all associated project activities.

This Policy applies to:

- Visitors to the HEAL-D project website
- Individuals who contact us via email or telephone
- Students, educators, and healthcare professionals participating in project activities
- Subscribers to project newsletters and communications
- Representatives of partner organisations (BUPNET GmbH – Germany, Xenios Polis – Greece, UET – Albania, NAPH – Albania, AMECCR – Kosovo, KPU Universum – Kosovo)

2. Data Controller and Contact Details

The data controller responsible for processing personal data collected via this website and project activities is:

Field	Details
Organisation	UET — European University of Tirana
Address	Rr. Komuna e Parisit, Tirana, Albania
Phone	+355 4 2274 881
Email	info@uet.edu.al
Website	https://heald-project-eu.org/
Legal Form	University (Universiteti Europian i Tiranës)
Supervisory Authority	Information and Data Protection Commissioner (IDP) — Albania

For any questions, complaints, or requests related to your personal data, please contact us at the above email address, marking your correspondence 'Data Protection — HEAL-D'.

3. Legal Bases for Processing

HEAL-D processes personal data only where a valid legal basis under Article 6 GDPR exists. The applicable legal bases are:

Legal Basis (Art. 6 GDPR)	Context of Use
Art. 6(1)(a) — Consent	Newsletter subscriptions; optional contact form submissions; cookie consent (where applicable)
Art. 6(1)(b) — Contract Performance	Participation in project activities, training programmes, and WBL placements
Art. 6(1)(c) — Legal Obligation	Compliance with EU funding reporting requirements (Erasmus+ grant agreement)
Art. 6(1)(e) — Public Task / Legitimate Interest	EU-funded project outputs, dissemination of results, academic publications
Art. 6(1)(f) — Legitimate Interests	Website analytics, IT security, fraud prevention

Where processing is based on consent (Art. 6(1)(a)), you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before withdrawal.

4. Categories of Personal Data Collected

4.1 Website Visitors

When you visit heald-project-eu.org, the following data may be automatically collected by our web server (WordPress / Elementor hosted environment):

- IP address (anonymised or pseudonymised where technically feasible)
- Browser type and version
- Operating system
- Referring URL and pages visited
- Date and time of access
- HTTP status codes

This data is processed for the purposes of ensuring website security, diagnosing technical errors, and compiling anonymous statistical information about website usage. It is not used to identify individual visitors.

4.2 Contact Enquiries

When you contact HEAL-D via email (info@uet.edu.al) or telephone, we collect:

- Your name
- Email address and/or telephone number
- The content of your enquiry
- Any additional information you voluntarily provide

This data is used solely to respond to your enquiry and is retained only for as long as necessary to resolve the matter, subject to any legal archiving requirements.

4.3 Project Participants

For students, educators, and healthcare professionals participating in HEAL-D training and work-based learning (WBL) activities, we may collect:

- Full name, date of birth, nationality
- Contact information (email, postal address, phone)
- Professional qualifications and employment details
- Learning outcomes, assessment results, and attendance records
- Participant feedback and evaluation forms
- Photographs or video recordings taken during project events (subject to separate consent)

4.4 Social Media Interactions

HEAL-D maintains accounts on Instagram (@heal.d.project), LinkedIn (heal-d), and Facebook (heal.d.project). If you interact with us via these platforms, the data processing is governed by the respective platform's privacy policy. HEAL-D may collect publicly available information in connection with project dissemination activities.

4.5 Cookies and Tracking Technologies

The HEAL-D website is built with WordPress and the Elementor page builder. The following categories of cookies may be in use:

Cookie Category	Purpose and Examples
Strictly Necessary	Session management, security tokens, WordPress admin authentication. Cannot be disabled.
Functional / Preference	Remembering language preferences or accessibility settings.
Analytics	Anonymous usage statistics (e.g., Google Analytics, if enabled). IP addresses are anonymised.
Third-Party Embedded Content	Cookies set by embedded Unsplash images or social media widgets.

Under the ePrivacy Directive and applicable national law, non-essential cookies require your prior consent. A cookie consent banner must be implemented on this website. Until explicit consent is given, only strictly necessary cookies should be loaded.

5. Purposes of Processing

Personal data collected by HEAL-D is processed for the following specific, explicit, and legitimate purposes:

- Operation and maintenance of the project website
- Responding to enquiries and correspondence
- Managing participant registration and attendance for training activities
- Delivering educational programmes and issuing certificates of participation
- Reporting to the European Education and Culture Executive Agency (EACEA) as required under the Erasmus+ grant agreement
- Dissemination of project results, publications, and outcomes
- Improving website functionality and user experience
- Ensuring information security and preventing unauthorised access
- Compliance with legal and regulatory obligations

6. Disclosure and Transfer of Personal Data

6.1 Project Partners

Personal data may be shared with HEAL-D project partner organisations as strictly necessary for the performance of project activities:

- BUPNET GmbH — Germany (Lead Partner / Coordinator)
- Xenios Polis — Greece
- UET — European University of Tirana — Albania (Website Operator / Data Controller)

- NAPH (National Agency for Public Health) — Albania
- AMECCR — Kosovo
- KPU Universum — Kosovo

All partners are bound by the terms of the HEAL-D Consortium Agreement, which includes data protection obligations consistent with the GDPR.

6.2 European Commission / EACEA

As a condition of the Erasmus+ funding agreement, certain personal data (including participant details) may be provided to the European Education and Culture Executive Agency (EACEA) and/or the European Commission. Processing by these institutions is governed by Regulation (EU) 2018/1725.

6.3 Service Providers

We may engage third-party data processors to support website operation and project administration (e.g., web hosting providers, email service providers). Any such processors are engaged under a written data processing agreement (DPA) in accordance with Article 28 GDPR.

6.4 International Transfers

UET is an Albanian institution and the website data controller. Albania is not currently the subject of an EU adequacy decision under Article 45 GDPR; however, Albania has substantially aligned its data protection law with the GDPR as part of its EU accession process. Transfers of personal data from EU-based partners (Germany, Greece) to UET in Albania are conducted under Standard Contractual Clauses (SCCs) adopted by the European Commission under Article 46(2)(c) GDPR. Similarly, transfers to Kosovo-based partners (AMECCR, KPU Universum) rely on SCCs supplemented by appropriate technical and organisational measures.

6.5 No Sale of Data

HEAL-D does not sell, rent, or trade personal data to any third parties for commercial purposes.

7. Data Retention

Personal data is retained only for as long as necessary for the purposes for which it was collected, in accordance with the following retention schedule:

Data Category	Retention Period
Website server logs / IP data	Up to 30 days, then deleted or anonymised
Contact enquiries (email/phone)	12 months after resolution of the enquiry

Project participant records (training, assessment)	5 years after project end, as required by Erasmus+ audit rules
Financial and grant-related records	10 years, in accordance with EU financial regulations
Consent records (newsletter, cookies)	Until consent is withdrawn + 3 years for evidence of consent
Event photographs and video	Duration of the project + 3 years for dissemination purposes (subject to consent)

After the applicable retention period, personal data is securely deleted or anonymised in accordance with our internal data disposal procedures.

8. Your Rights as a Data Subject

Under the GDPR, you have the following rights with respect to your personal data:

Right	Description
Right of Access (Art. 15)	Request a copy of personal data we hold about you and information about how it is processed.
Right to Rectification (Art. 16)	Request correction of inaccurate or incomplete personal data.
Right to Erasure (Art. 17)	Request deletion of your personal data where processing is no longer necessary or lawful ('right to be forgotten').
Right to Restriction (Art. 18)	Request that processing of your data be restricted in certain circumstances.
Right to Data Portability (Art. 20)	Receive your personal data in a structured, machine-readable format and transmit it to another controller.
Right to Object (Art. 21)	Object to processing based on legitimate interests or for direct marketing purposes.
Right to Withdraw Consent (Art. 7(3))	Withdraw consent at any time where processing is based on consent, without affecting prior processing.
Right to Lodge a Complaint (Art. 77)	Lodge a complaint with the supervisory authority (see Section 9 below).

To exercise any of these rights, please submit a written request to: info@uet.edu.al, with the subject line 'GDPR Data Subject Request — HEAL-D'. We will respond within one calendar month of receipt of your request. In complex cases, this period may be extended by a further two months, and you will be notified accordingly.

We may request proof of identity before processing your request to protect personal data against unauthorised access.

9. Right to Lodge a Complaint

If you believe that the processing of your personal data infringes the GDPR, you have the right to lodge a complaint with the competent supervisory authority. The lead supervisory authority for HEAL-D is:

Lead Supervisory Authority (Albania)

Information and Data Protection Commissioner (IDP — Komisioneri për të Drejtën e Informimit dhe Mbrojtjen e të Dhënave) Rr. "Papa Gjon Pali II", Nr. 3, Tirana, Albania Tel: +355 4 2259 314 Email: info.idp@idp.al Website: <https://www.idp.al>

As UET is an Albanian institution, the primary supervisory authority is the Albanian IDP. Participants located in Kosovo may also contact the Information and Privacy Agency (IPA) of Kosovo. Project partners in EU Member States (Germany, Greece) remain subject to their respective national supervisory authorities for processing activities conducted in those jurisdictions.

10. Technical and Organisational Security Measures

HEAL-D implements appropriate technical and organisational measures (TOMs) to ensure a level of security appropriate to the risk, in accordance with Article 32 GDPR. These include:

- SSL/TLS encryption (HTTPS) for all website traffic
- Password-protected access to the WordPress content management system
- Role-based access controls limiting staff access to personal data on a need-to-know basis
- Regular software updates and security patches for the WordPress and Elementor platform
- Data processing agreements with all third-party service providers
- Staff awareness and training on data protection obligations
- Procedures for detecting and responding to personal data breaches

In the event of a personal data breach likely to result in a risk to your rights and freedoms, we will notify the competent supervisory authority within 72 hours and, where required, inform affected individuals without undue delay.

11. Erasmus+ Funding and EU Reporting Obligations

The HEAL-D project is funded by the European Union under the Erasmus+ programme. As a condition of the grant agreement with EACEA, the project is required to:

- Maintain records of participant mobility and training activities
- Submit financial and technical reports including participant statistics
- Make certain project outputs (deliverables) publicly available
- Allow audit and monitoring visits by EACEA and the European Commission

Where personal data must be included in reports submitted to EACEA, this is done on the basis of Article 6(1)(c) GDPR (legal obligation) and Article 6(1)(e) GDPR (performance of a task in the public interest). Processing by EACEA and the Commission is subject to Regulation (EU) 2018/1725.

12. Processing of Children's Data

The HEAL-D website is not directed at children under the age of 16. We do not knowingly collect personal data from children under 16 without the verified consent of a parent or guardian. If you believe we have inadvertently collected data from a child under 16, please contact us immediately at info@uet.edu.al and we will take prompt steps to delete such data.

13. Third-Party Links and Embedded Content

The HEAL-D website contains links to third-party websites and embedded content from external platforms (including Unsplash for images, Instagram, LinkedIn, and Facebook). HEAL-D is not responsible for the privacy practices or content of these third-party platforms. We encourage you to review the privacy policies of any third-party sites you visit.

The HEAL-D website uses the WordPress content management system and the Elementor page builder, which may introduce their own cookies and tracking scripts. Please refer to the WordPress Privacy Policy (<https://wordpress.org/about/privacy/>) and Elementor's privacy documentation for further details.

14. Updates to This Privacy Policy

This Privacy Policy may be updated from time to time to reflect changes in legal requirements, project activities, or our processing practices. The current version will always be available on the HEAL-D website at <https://heald-project-eu.org/>. The version date at the top of this document indicates when it was last revised.

Where changes are material, we will take reasonable steps to notify affected individuals (e.g., via a notice on the website or by email where we hold your contact details).

15. Cookie Policy

15.1 What Are Cookies?

Cookies are small text files placed on your device by websites you visit. They are widely used to make websites work more efficiently and to provide information to website operators.

15.2 Cookies Used on heald-project-eu.org

The HEAL-D website is built using WordPress 6.x with Elementor 4.0.7. The following cookies may be set:

Cookie Name	Provider	Purpose	Duration
wordpress_*	WordPress	Session management and authentication	Session
wp-settings-*	WordPress	User interface preferences	1 year
elementor	Elementor	Caches page builder structure	Never (localStorage)
_ga / _gid	Google Analytics (if active)	Anonymous analytics and statistics	2 years / 24h

15.3 Managing Cookies

You can control and manage cookies in your browser settings. Please note that disabling certain cookies may affect the functionality of the website. You may also opt out of Google Analytics tracking by installing the Google Analytics opt-out browser add-on (<https://tools.google.com/dlpage/gaoptout>).

16. Definitions

Term	Definition
Personal Data	Any information relating to an identified or identifiable natural person (Art. 4(1) GDPR)
Processing	Any operation performed on personal data, including collection, storage, use, and deletion (Art. 4(2) GDPR)
Data Controller	The entity that determines the purposes and means of processing personal data (Art. 4(7) GDPR)
Data Processor	An entity that processes personal data on behalf of the controller (Art. 4(8) GDPR)
Data Subject	The natural person whose personal data is being processed
Consent	Freely given, specific, informed, and unambiguous indication of agreement to processing (Art. 4(11) GDPR)
GDPR	Regulation (EU) 2016/679 — General Data Protection Regulation
EACEA	European Education and Culture Executive Agency
DPA	Data Processing Agreement — contract required under Art. 28 GDPR with processors
SCCs	Standard Contractual Clauses — EU-approved transfer mechanism for third-country transfers

Document Control

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