*Please note: The purpose of the following information is to make the essence of the arrangement between the parties to the agreement available to all data subjects. In order for data subjects to be able to exercise their rights effectively, it is essential that the information provided here is generally intelligible and transparent.*

Party 1 and Party 2 will work closely together on “the project”. Personal data will be processed at different stages of processing and by different systems operated by either Party 1 or Party 2. This will also apply to the processing of your personal data. The parties have jointly determined the sequence in which this data will be processed for each stage of processing. The parties will therefore be acting as joint controllers responsible for the protection of your personal data within the stages of processing set out below (Article 26 GDPR).

**At which stages of processing will data be processed, and how? What have the parties agreed upon?**

*[Please provide a clear and concise description of each processing stage. - Control question: How will personal data be processed by the different systems?]*

As part of their joint controllership under data protection law, Party 1 and Party 2 have agreed which party will be responsible for which stages of processing:

|  |  |  |  |
| --- | --- | --- | --- |
| **Data processing stage** *Abstract data processing stage* | **Type of data** *What data will be processed, and how? Concrete steps*  | **Binding***TOMs* | **Controller***Responsible for data processing* |
|  |  |  |  |

**What does this mean for data subjects?**

Even where the parties act as joint controllers, they will fulfil the data protection requirements in accordance with their respective responsibilities for the specific stages of processing as follows:

* Where the parties act as joint controllers,
* Party 1 will be responsible for the processing of personal data at Stage xxx and
* Party 2 will be responsible for the processing of personal data at Stage yyy.
* Party 1 and Party 2 *[alternatively: Party 1 or Party 2]* will provide any information required under articles 13 and 14 of the GDPR to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language and free of charge. For this purpose, each party will provide the other party with all necessary information from its area of activity.
* The parties will immediately inform each other of any request made by data subjects. They will provide each other with all the information necessary to fulfil access requests.
* Data protection rights may be invoked against Party 1 and Party 2 *[alternatively: specify the relevant contact point –].* In principle, data subjects will receive the information from the entity they have contacted to assert their rights *[alternatively: specify the relevant entity providing the information]*.

*Please note: Even where a single contact point is specified, the data subject may contact both parties. This must not result in any disadvantages for the assertion of their rights.*

*Version: March 2022*

*Created by the NRW Universities Data Protection Officers project group*

*Dr Thilo Groll, LL.M/ Dortmund University of Applied Sciences and Arts,* *datenschutz@fh-dortmund.de*

*Dr Ursula Hilgers/ Heinrich Heine University Düsseldorf, datenschutz@hhu.de*

*Christian Schumann/ University of Siegen, datenschutzbeauftragter@uni-siegen.de*

*Sabine Sonneborn/ Ruhr University Bochum,* *dsb@rub.de*

*Dr Britta Weber/ University of Health Sciences, Bochum,* *dsb@hs-gesundheit**.de*

*Dr Eva-Maria Wicker, LL.M/ Paderborn University, datenschutz@upb.de*