

## **“VISITING IN TRENTINO” Call for Applications**

**Disclaimer:** *This document has been drawn up in Italian and English. In the event of discrepancies between the original Italian text and the translation, the Italian version shall prevail.*

This call for applications is directed at funding "Visiting" programmes for researchers and/or professors working abroad, to be implemented at Trentino research organisations, in order to reinforce a network of exchange and cooperation and enhance know-how as regards the use of innovative methodologies. The initiative also aims to facilitate the return of researchers and/or professors originally from Trentino, also on a temporary basis.

This call has been launched pursuant to article 22 of Provincial Law no. 14 of 2 August 2005 (Provincial Law on Research) and in accordance with the general lines of action outlined in the 16<sup>th</sup> Legislature's Long-term Research Programme, approved with Provincial Government Resolution no. 2193 of 22 December 2020.

The call and other useful information, along with the relevant forms, have been published on the following website: <https://www.provincia.tn.it/Argomenti/Ricerca-e-innovazione>.

### **Article 1 Context and general objectives**

In the Provincial Development Programme (*Programma di Sviluppo Provinciale - PSP*) of the 16<sup>th</sup> legislature<sup>1</sup>, the Autonomous Province of Trento has identified a number of strategies useful for pursuing the objective of 'excellence of the research system'. These include fostering the capacity to attract researchers, investment and research-oriented organisations and entities through dedicated hosting packages and by reinforcing specific localisation factors, such as the presence of specialised infrastructures for experimentation, integration, prototyping and advanced research. This is also designed to encourage public and private research companies and laboratories at the forefront to establish themselves in Trentino. Furthermore, the Provincial Development Programme aims to enhance the inclusion of Trentino research in national and international research networks, and to support advanced research projects, promoting international cooperation with centres of excellence in the sectors of interest.

The Long-term Research Programme (*Programma Pluriennale della Ricerca - PPR*) for the 16<sup>th</sup> Legislature<sup>2</sup>, which is the Province's policy document in the field of research, pays particular attention to capacity building through the attraction and exploitation of talent, by enhancing, among other things, recruitment programmes for outstanding students and visiting researchers/professors at international level. These opportunities for interaction may act as a driving force for the economic system in terms of attracting and establishing new professional expertise, laboratories and companies interested in investing in a given sector.

Internationalisation is one of the objectives of the PPR, as a driver of growth both in terms of scientific quality and knowledge exchange, the attraction of highly specialised human capital, the development of cooperative projects and an increase in possible links with partners of proven experience to carry out activities of mutual interest.

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<sup>1</sup>Document approved with Provincial Government Resolution no. 1075 of 19 July 2019

<sup>2</sup>Document approved with Provincial Government Resolution no. 2193 of 22 December 2020

## Article 2 Scope and general implementation guidelines

The Autonomous Province of Trento is launching a public selection procedure aimed at supporting stays in research organisations in the Trentino 'Visiting' programme by foreigners or Italians with proven experience and qualifications working abroad in research organisations or institutions carrying out research activities.

Specifically, this initiative aims to foster new forms of collaboration in the research areas promoted by the Provincial Research and Innovation System in order to:

- link up researchers with high-level scientific qualifications working in foreign institutions with the local research community to share themes and topics, along with methodologies and tools of strategic interest for the Provincial Research and Innovation System, through the creation of structured and long-term relationships and links;
- enhance their skills and experience, to reinforce the national and international positioning of the Provincial Research and Innovation System, thus promoting Trentino's economic and social development as well as its ability to attract EU and non-EU funding.

The *Visiting* researcher will carry out a programme of scientific research, which may also include teaching activities, in areas of strategic interest for the provincial system, agreed upon and implemented at:

- research organisations<sup>3</sup>, as defined in the Communication of the European Commission C (2022) 7388 final of 19 October 2022, that carry out research activities in the province;
- other public entities carrying out research activities in the provincial territory and having their registered and/or operational offices in Trentino.

The *Visiting* researcher will agree a detailed programme of scientific activities with the host institution, also on the basis of the strategic development policies of the institution and those of the Provincial Research and Innovation System as defined in the Long-term Research Programme. The programme will identify the profile, objectives, methods, timing of involvement and commitment required, as well as the results expected from the collaboration.

The *Visiting* researcher's stay will last between **6 and 9 months**, to normally take place on a continuous basis.

The *Visiting* researcher's stay must be established with a timescale and methods enabling a concrete increase in the quality of research, real spin-offs in scientific terms, the consolidation and/or formalisation of bilateral agreements and the creation of long-term cooperation.

## Article 3 Targets of the call and eligibility requirements

The call is directed at researchers and/or professors with proven experience and qualifications, who carry out research or teaching activities in the scientific-disciplinary fields included in at least

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<sup>3</sup>"research organisation": means an entity (such as universities or research institutes, technology transfer agencies, innovation intermediaries, research-oriented physical or virtual collaborative entities), irrespective of its legal status (organised under public or private law) or way of financing, whose primary goal is to independently conduct fundamental research, industrial research or experimental development or to widely disseminate the results of such activities by way of teaching, publication or knowledge transfer. Where such entity also pursues economic activities, the financing, the costs and the revenues of those economic activities must be accounted for separately. Undertakings that can exert a decisive influence upon such an entity, for example in the quality of shareholders or members, may not enjoy a preferential access to the results generated by it.

one of the three panels defined by the ERC<sup>4</sup> (European Research Council), i.e. **Physical Sciences and Engineering, Life Sciences and Social Sciences and Humanities**.

Applications may thus be made by those meeting the following requirements, by the deadline for submitting applications, under penalty of exclusion:

1. holder of a PhD academic title for at least three years, or alternatively at least 20 years' research experience;
2. stable employment for at least three years as researcher or professor at a foreign university or research institution. The term 'stable' refers to a contract abroad covering at least 30 months in the last three years preceding the application deadline. Periods spent pursuing a PhD degree qualification and services provided at foreign institutions on the basis of scholarships or funding obtained in Italy are not counted for the purposes of accruing the three-year period of research or teaching activity abroad. During the three-year period preceding the submission of the application, applicants must not have held any position (fixed-term researchers, research grant holders, contract workers, PhD studies, including doctoral courses in co-operation with foreign universities and research centres, scholarship holders) with universities or non-university bodies/institutions with their main headquarters in Italy.

Those who have already participated in the "*Visiting Expert 2018*" call for applications are not eligible to participate in this call.

#### **Article 4 Period in which activities are carried out and constraints for the host institution**

The *Visiting* researcher's stay must last between 6 and 9 months, normally on a continuous basis, during which the *Visiting* researcher is required to carry out research, and possibly also teaching activities, according to the project submitted and agreed with the host institution.

While carrying out the agreed activities, the *Visiting* researcher must comply with the host institution's internal provisions on workplace safety and privacy with regard to data processing, access to and management of databases, and the provisions contained in codes of ethics, values or behaviour, and organisational, management and monitoring procedures.

The host institution must guarantee the availability of the spaces, equipment and facilities necessary for the *Visiting* researcher to carry out the agreed activities.

#### **Article 5 Remuneration of the *Visiting* researcher**

Each host institution shall stipulate an employment contract with the *Visiting* researcher for the duration of the stay in accordance with the contractual forms provided for by its internal regulations, guaranteeing all insurance and social security coverage in accordance with the law.

The Province shall grant the host institution a variable amount of up to EUR 4,500.00 to cover the gross monthly remuneration paid to the *Visiting* researcher for the duration of the *Visiting* researcher's effective stay in Trentino and a fixed monthly amount of EUR 500.00 gross, in addition to any social security and welfare charges, as a mobility allowance.

A fixed amount of EUR 800.00 per month shall also be paid to the host institution to cover the direct and indirect costs of carrying out research and possible teaching activities.

#### **Article 6 Provincial resources and commitments of the host institution**

The total provincial funding allocated to the initiative amounts to EUR 209,942.00.

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<sup>4</sup>For further information regarding the structure of the European Research Council (ERC) panels see the following link: [https://erc.europa.eu/sites/default/files/2023-03/ERC\\_panel\\_structure\\_2024\\_calls.pdf](https://erc.europa.eu/sites/default/files/2023-03/ERC_panel_structure_2024_calls.pdf)

The total number of positions eligible for funding will be established during the selection phase on the basis of the number of applications submitted and the duration of the proposed mobility, within the limit of the overall budget available.

The provincial contribution will cover 100% of eligible costs, within the limit of the maximum amount provided for in article 5 and will be allocated and paid by the Province to the host institution.

The host institution shall guarantee:

- payment of the *Visiting* researcher's remuneration;
- administrative management;
- meeting of the costs necessary to implement the *Visiting* researcher's programme of activities;
- provision of the spaces and equipment necessary to carry out the activities;
- organisational support for international reception procedures (immigration processes when necessary, assistance in finding accommodation and other procedures linked to possible transfer of the family unit to Trentino).

### **Article 7 Submission of applications**

The application form and relative attachments may be drawn up in Italian or English and must be sent to the relevant department responsible for research in the Autonomous Province of Trento.

The application form and forms A, B and C, as specified below, must be completed using the facsimiles published at the following address, under penalty of exclusion:  
<https://www.provincia.tn.it/Argomenti/Ricerca-e-innovazione>.

The forms to be submitted are as follows:

1. **Application form** with general information about the *Visiting* researcher;
2. **Form A - General information and detailed programme of the research and possible teaching activities planned during the period of stay.** The form must give:
  - the host institution and the name of the lecturer/researcher of reference, with their contact details;
  - the duration and period of the *Visiting* programme;
  - a summary of the planned research and possibly also teaching activities;
  - a detailed programme of the research activities, and if relevant the teaching programme it is intended to carry out during the stay in addition to research, specifying the following: the state of the art to which the research activities relate and the advances proposed by the research programme, the methodology adopted, the objectives and the expected impact of the results it is intended to achieve during the *Visiting* researcher's stay, as well as the subsequent development, the contribution and the place of the research programme in the context of the strategic policy of the host institution and the Provincial Research and Innovation System;
3. **Form B - Declaration of the host institution**, with the commitment to support the research programme and possible teaching activities proposed by the *Visiting* researcher;

#### 4. Form C - Financial Plan.

The following documents must also be submitted:

- **Declaration issued by the home organisation, and by any other institution where the candidate has worked, when necessary to reach the required duration over the three-year time period**, showing that research and any additional teaching activities have been carried out for a period of at least 30 months in the last three years preceding the deadline for submitting applications and that these activities are still ongoing on the date of the deadline for submitting applications;
- **Comprehensive curriculum vitae for the candidate** showing that research and any additional teaching activities have been carried out for a period of at least 30 months in the last three years preceding the deadline for submitting applications, including a list of the most representative publications, with reference to the activities to be carried out at the host institution (maximum 5 pages);
- **Copy of a valid passport or European identity card of the applicant.**

The application must be completed using the aforementioned forms and must be sent, complete with all the documentation required by this article, in pdf format by e-mail (via standard or certified e-mail - PEC) to the following e-mail address: [serv.industriaricercaminerario@pec.provincia.tn.it](mailto:serv.industriaricercaminerario@pec.provincia.tn.it) **from 1<sup>st</sup> February 2024 until 28<sup>th</sup> June 2024, at 13:00 Central European Time (CEST).**

The application is not subject to stamp duty if made from abroad, in accordance with the provisions of article 2, paragraph 1 of Presidential Decree no. 642/72 ("*Stamp duty is due from the outset for the deeds, documents and registers shown in part one of the tariff, if made from within the State, and in the event of use for those shown in part two*"). However, any researcher submitting the application from Italy, will instead have to pay the tax, for an amount of EUR 16.00.

Applications received after the deadlines indicated above will be considered inadmissible.

#### Article 8 Evaluation methods and criteria

Preliminary examination of applications will be carried out by the department responsible for research, which after checking the administrative compliance of the documentation received, will forward eligible project proposals to the Research and Innovation Committee for assessment of merit.

The Research and Innovation Committee may also consider making use of external experts with high-level scientific qualifications in the field.

The criteria to be used by the Research and Innovation Committee are as follows:

Evaluation criteria	Score
Evaluation of the <i>Visiting</i> researcher's curriculum vitae and experience in the academic or research field.	<b>0-30</b>

Quality of the programme of research activities and possible additional teaching activities to be carried out during the period of stay.	<b>0-30</b>
Expected impact in relation to the objectives and results it is intended to achieve, in terms of both the home and host institution, during the <i>Visiting</i> researcher's experience and in the subsequent period.	<b>0-30</b>
Contribution of the proposed research programme for the <i>Visiting</i> researcher's period of stay to the strategic policy of the host institution and to the priority research areas for the province and strategic projects established by the 16 <sup>th</sup> Legislature's Long-term Research Programme.	<b>0-10</b>

An additional **5 points** shall also be awarded:

- to candidates from Trentino who have emigrated abroad for at least 5 years; for this purpose, candidates who were resident in Trentino for at least 10 years shall be considered; **or**
- to candidates who have obtained a PhD in Trentino and who meet the requirements set forth in article 3.

At the end of the evaluation process, the Research and Innovation Committee shall draw up a classification of merit, listed in descending order based on the score.

The minimum score required for admission to the classification is **60 points**.

In terms of priorities for the applications submitted, in the event of equal scores, preference shall be given firstly to candidates from Trentino who have emigrated abroad, and secondly to the younger candidate.

#### **Article 9 Approval of the classification, acceptance of funding and starting up of activities**

The classification shall be approved with a resolution of the Head responsible for research within 90 days of the deadline for submitting applications to this call for applications.

The classification shall be valid for 180 (one hundred and eighty) days from the date of its approval.

Funding of the projects shall be determined with a subsequent decision of the Head responsible for research within 15 days of the aforementioned resolution and shall be communicated to the host institution and the applicant.

The provincial contribution will be allocated and paid to the host institution, which will be responsible for the activities indicated in article 6.

Within 15 days of receiving notice of funding, the *Visiting* researcher must forward, through the host institution, their acceptance of the funding and the start date for the activities, **which must be no later than 31<sup>st</sup> October 2025**.

Failure to comply with any of the above deadlines will result in forfeiture of the contribution.

#### **Article 10 Types of eligible costs for funding**

Eligible costs for funding are:

- a) costs for the *Visiting* researcher: gross remuneration paid to the *Visiting* researcher of up to EUR 4,500.00 per month, plus social security and welfare charges borne by the host institution;  
NB: any fees and related charges higher than the limit indicated shall be borne by the host institution;
- b) cost of the mobility allowance granted to the *Visiting* researcher: a fixed amount of €500.00 per month gross, plus social security and welfare charges payable by the host institution;
- c) a fixed amount of EUR 800.00 per month to be paid to the host institution to cover the direct and indirect costs of carrying out the research and possible teaching activities.

#### **Article 11 Procedure for issuing funding**

Funding shall be issued, following a signed application by the *Visiting* researcher and the administrative director of the host institution, as follows:

- an initial payment of 50% of the financial plan set out in Form C, attached to the application, in the form of an advance payment, within 30 days of the request and following the actual start of the *Visiting* activities, as confirmed by the host institution;
- the balance, following verification of the reporting documents provided for in Article 12 and within the limits of the funding granted, for the difference between the amount reported and deemed eligible and any amount already paid by the Province as an advance.

#### **Article 12 Reporting methods**

The following documents must be submitted through the host Institution no more than 30 (thirty) days after the end of the *Visiting* researcher project:

- a) **report on the activities carried out by the *Visiting* researcher**, assessed by the Research and Innovation Committee, which will issue an evaluation. This report, prepared by the *Visiting* researcher and submitted through the host institution, must illustrate in an exhaustive manner:
  - the contribution to the development of scientific activity made by the *Visiting* researcher both during their stay at the institution and following the end of the secondment period;
  - the degree to which the objectives and results it was intended to reach in relation to both the home and host institutions were achieved during the *Visiting* researcher's project;
  - the contribution made by the proposed research programme for the *Visiting* researcher's stay to the host institution's strategic policy and the research policy guidelines set out in the 16<sup>th</sup> Legislature's Long-term Research Programme;
- a) **an accounting and financial report** on the costs incurred and any income, endorsed by the administrative director of the host institution and the *Visiting* researcher;
- b) **the provision with which the host institution has acknowledged completion of the project and the total costs and any revenue.**

When the report is submitted, the host institution shall at the same time pay the Province any excess funding received compared to the amounts reported. Once verification of reporting has been completed, any further excess sums received in relation to the funding due must be returned within 30 days of the request. Once this deadline has expired, the provisions of article 51, paragraph 4 of the Provincial Accounting Law no. 7 of 14 September 1979 and subsequent amendments shall apply.

All reports on activities and financial statements must be drawn up according to the facsimiles made available by the department responsible for research.

Failure to submit the final report on activities and/or the final accounting and financial report by the deadline set out in this article shall be penalised with a 5% reduction in the grant to which the applicant is entitled, calculated on the basis of eligible costs, in accordance with Provincial Government Resolution no. 1980 of 14 September 2007, Annex 2, item 3.

Failure to submit the final accounts shall result in the cancellation of funding.

In the event of a negative evaluation of the final report on the activities carried out, the Research and Innovation Committee may propose partial or total withdrawal of the funding granted. Such withdrawal shall be ordered with a provision by the Head of the Department responsible for research.

The provisions of Article 51(4) of Provincial Law no. 7 of 14 September 1979 shall apply to the recovery of excess sums disbursed in the case of revoked or redetermined funding.

The amount to be repaid shall be increased by simple interest calculated at the legal interest rate from the date on which the payment order is debited until repayment.

### **Article 13 Suspension and renunciation**

Any request or communication concerning the project must be forwarded by the *Visiting* researcher to the relevant department via the host institution.

The period of stay may be suspended:

- a) for parental leave pursuant to Legislative Decree no. 151 of 26 March 2001 and subsequent amendments;
- b) for serious reasons;
- c) for scientifically significant reasons, the merits of which shall be evaluated by the Committee.

In the aforementioned cases, the duration of the project will be redetermined with a provision of the Head of the relevant department in relation to the period of suspension requested.

The suspension referred to in sections b) and c) may last for a maximum of six months, after which the project shall be deemed to have terminated.

In any case, no costs related to the implementation of the project may be charged during the period of suspension.

If the *Visiting* researcher is forced to forgo continuing the activities for exceptional and totally unforeseeable reasons, they must promptly notify the relevant department (through the host institution). Within 30 days of the termination of activities, the final financial report provided for in the preceding article must be submitted for assessment by the Committee, which will propose any redetermination of funding.

Suspension and early termination shall be formalised with a provision issued by the Head of the relevant department, after consulting the Research and Innovation Committee.



## **Article 14 Property of the research results**

1. Any work, written material or products relating to the project must mention the Autonomous Province of Trento and make specific reference to this call for applications.
2. As regards the management of intellectual property rights, see Provincial Government Resolution no. 2227 of 19 December 2017.

## **PRIVACY NOTICE**

### **PURSUANT TO ARTICLES 13 AND 14 OF EU REGULATION no. 679 of 2016**

European Regulation EU/2016/679 (hereafter referred to as the "Regulation") sets out rules on the protection of natural persons with regard to the processing of personal data. In compliance with the principle of transparency provided for in article 5 of the Regulation, the Autonomous Province of Trento hereby provides you with the information required by articles 13 and 14 of the Regulation (data collection from the Data Subject and third parties respectively).

The **Data Controller** for your personal data is the Autonomous Province of Trento (hereafter referred to as the "Data Controller"), in the person of its legal representative (President of the Provincial Government in office), Piazza Dante n. 15, 38122 - Trento, tel. 0461.494697, fax 0461.494603 e-mail [direzionegenerale@provincia.tn.it](mailto:direzionegenerale@provincia.tn.it), certified e-mail (PEC) [segret.generale@pec.provincia.tn.it](mailto:segret.generale@pec.provincia.tn.it).

The Data Processor is the pro tempore Head of the Industry, Research and Mining Department; the contact details are as follows: Via Guardini, n. 75, 38121 Trento, tel. 0461/495684, fax 0461/495623, e-mail [serv.industriaricercaminerario@pec.provincia.tn.it](mailto:serv.industriaricercaminerario@pec.provincia.tn.it). The Data Processor is also the **party designated to respond** to the Data Subject should they choose to exercise their rights pursuant to articles 15 - 22 of the Regulation, as described below.

The contact details for the **Data Protection Officer** (DPO) are as follows: via Mantova n. 67, 38122 - Trento, fax 0461.499277, e-mail [idprivacy@provincia.tn.it](mailto:idprivacy@provincia.tn.it) ("Request for DPO intervention ex art. 38 EU Reg" should be stated in the subject line).

Your personal data will be processed in compliance with the legislation on the protection of personal data, and specifically in line with the principles of fairness, lawfulness and transparency, storage limitation and data minimisation, in accordance with articles 5 and 25 of the Regulation.

## **1. SOURCE OF THE PERSONAL DATA**

Your data were collected from the data subject (yourself).

## **2. CATEGORIES OF PERSONAL DATA**

The personal data processed belong to personal data other than 'special categories of data' (so-called common data) - personal data, e-mail, professional activities.

### 3. PURPOSE AND LEGAL BASIS OF THE PROCESSING

The principle of minimisation establishes that only relevant personal data not extending beyond the specific purpose of processing may be collected and processed.

The principle of storage limitation establishes that data should only be kept in a form that permits the identification of the data subjects for as long as is necessary for the purposes for which the personal data are processed, except in exceptional cases.

The personal data provided by you will be processed in accordance with the principles of lawfulness, fairness and purpose limitation and will be used to provide the service for which the declaration is intended.

For these reasons, and to comply with articles 13 and 14 of the Regulation, below we also specifically indicate the **purpose of the processing** (i.e. the purpose for which personal data are collected and subsequently processed) and the relevant **legal basis** (namely the legal provisions - national or EU - or regulation or general administrative measure) permitting the processing of your data: to perform a task of public interest or linked to the exercising of public powers vested in the Data Controller (article 6 (1) (e) of the Regulation and specifically for the funding of research projects pursuant to article 22 of Provincial Law no. 14 of 2 August 2005.

The provision of your personal data is compulsory for the aforementioned purpose and for all supporting and related purposes (such as monitoring and advisory activities for example); refusal to provide such data will make it impossible to comply with the request related to the specific purpose. For the sake of clarity, we point out that your consent to the processing of such personal data is not required, since it is based on the aforementioned legal grounds.

### 4. MEANS OF PROCESSING

The data will be processed using paper and automated means (computers/electronic devices) with methods designed to safeguard the confidentiality, integrity and availability of the data.

Your data will be processed exclusively for the purposes indicated above, by our staff and specifically by specially appointed internal data processors (executives) as well as by specially authorised and trained staff in charge of data processing.

Again for the purposes indicated above, your data may be processed by parties carrying out relevant activities for the Data Controller, who provide sufficient guarantees regarding personal data protection and who are appointed as Data Processors pursuant to article 28 of the Regulation.

### 5. AUTOMATED DECISION-MAKING PROCESSES AND PROFILING

The personal data provided will not be in any way subject to automated decision-making processes.

## **6. COMMUNICATION AND DISSEMINATION OF DATA (CATEGORIES OF RECIPIENTS)**

The data collected will not be communicated to other parties who are not involved in the proceedings.

The data may be disseminated, also via the Internet, in accordance with the rules regulating the publication of administrative provisions. When dissemination of the data is compulsory in order to comply with specific transparency obligations provided for by the law in force, the guarantees provided for by legal provisions for the protection of personal data concerning the data subject remain unaffected.

## **7. TRANSFER OUTSIDE THE EU**

Your personal data will not be transferred outside the European Union.

## **8. DATA STORAGE PERIOD**

In compliance with the aforementioned principle of storage limitation, we inform you that the period for which your personal data will be retained is routinely established in the "Autonomous Province of Trento unified plan for the storage of documentation" (reference classification: 26.14.1).

For the procedure in question, we inform you that the storage period is 10 years or unlimited according to the provisions of the aforementioned plan, which may be consulted at

<https://www.cultura.trentino.it/Il-Dipartimento/Soprintendenza-per-i-beni-culturali/Ufficio-beni-archivistici-librari-e-Archivio-provinciale/Strumenti/g-Massimari-di-conservazione-e-di-scarto-per-le-strutture-della-PAT> .

## **9. RIGHTS OF THE DATA SUBJECT**

You may exercise the rights envisaged by the Regulation in relation to the Data Controller at any time.

According to current legislation, you may:

- request access to your personal data and obtain a copy of such data (article 15);
- request their rectification or supplementation respectively, if you consider them to be inaccurate or incomplete (article 16);
- object to the processing of your data (article 21), request their deletion (article 17), or exercise the right to restriction (article 18), if the legal requirements are met.

Pursuant to article 19, in so far as is possible without involving disproportionate effort, the Data Controller shall inform each possible recipient to whom the personal data may have been disclosed of any rectification or erasure of personal data or restriction of processing carried out; should you request this, the Data Controller will inform you of these recipients.

Furthermore, you have the right to lodge a complaint with the Data Protection Authority at any time.