

## EPOS ERIC PRIVACY POLICY

### 1. Information about us and this policy

#### 1.1 Introduction

EPOS ERIC (EPOS) is committed to protecting and respecting your privacy.

This policy ([https://www.epos-eu.org/sites/default/files/Privacy\\_Policy.pdf](https://www.epos-eu.org/sites/default/files/Privacy_Policy.pdf)) - and any other documents referred to in it - sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This policy aims to give you information on how EPOS collects and processes your personal data, through your use of our website [www.epos-eu.org](http://www.epos-eu.org) (our **Site**), or when you subscribe to our services or otherwise engage with any of our projects or apply for a position with EPOS. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

Our Site is not intended for children and we do not knowingly collect data relating to children.

#### 1.2 Data Controller

For the purpose of the General Data Protection Regulation (Regulation (EU) 2016/679) and any replacement or amending legislation, the data controller is EPOS ERIC.

EPOS ERIC has appointed a data protection officer (**DPO**) who is responsible for overseeing, ensuring and monitoring data protection compliance in accordance with this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

If you have a question or concern about how your personal information is being handled then please contact our DPO. You also have a right to raise issues with the Italian Data Protection Authority.



### 1.3 Contact Details

If you have any questions about this policy or how we are handling your personal information, please contact our DPO below:

Dr. Lucio Badiali, Ph.D  
Data Protection Officer  
EPOS ERIC (c/o INGV)  
Via di Vigna Murata 605  
00143 Roma

Data Protection Officer email: [dpo@epos-eric.eu](mailto:dpo@epos-eric.eu)

Data Controller email: [info@epos-eu.org](mailto:info@epos-eu.org)

You have the right to make a complaint at any time to the supervisory authority for data protection (**DPA**), the **Garante per la protezione dei dati personali**. We would, however, appreciate the chance to deal with your concerns before you approach the DPA so please contact us in the first instance.

Garante per la protezione dei dati personali  
Piazza Venezia n. 11 - 00187 Roma  
Ph: (+39) 06.696771  
Fax: (+39) 06.69677.3785

DPA email: [protocollo@gpdp.it](mailto:protocollo@gpdp.it)

### 1.4 Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on 2021.05.26. Historic versions can be obtained by contacting us at [info\[at\]epos-eu.org](mailto:info[at]epos-eu.org).

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.



## 1.5 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

## 2. Information we may collect about you

### 2.1 Categories of personal data

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Business Card Data** includes any information about you which is presented on your business card.
- **Contact Data** includes email address, phone number, fax number and postal or billing address.
- **Identity Data** includes nationality, date of birth, first name, last name, username and signature.
- **Communications Data** includes your preferences in receiving communications from us and our third parties and your communication preferences.
- **Professional Data** includes your scientific, education and professional background information (including details of the sector and organisation in which you work).
- **Profile Data** includes your username and password, your comments, feedback, posts, survey responses and other content you submit to us.
- **Recruitment Data** includes a copy of your CV and any ancillary information which you share with EPOS for recruitment purposes.
- **Technical Data** includes the internet protocol (IP) address used to connect your computer to the internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, unique device identifier and other technical identifiers, and for location-aware services, the physical location of your device.
- **Usage Data** includes information about your visit to our Site, including the full Uniform Resource Locators (URL) clickstream to, through and from our Site (including date and



time), products you viewed or searched for, page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

- **Asset Usage Data** recording the assets found, accessed interoperated and re-use with appropriate authorisation credentials.
- Data recording your acceptance of our disclaimers, terms and conditions, use of cookies.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for specific analytical purposes. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will not directly or indirectly reveal your identity.

We do not, as a matter of course, collect any **Special Categories of Personal Data** about you unless it is given voluntarily. Nor do we collect any information about criminal convictions and offences.

## 2.2 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Business Card, Contact, Identity, Communications, Professional, Profile, Recruitment Data by filling in forms on our Site, by completing application forms and conference attendance sheets or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you:
  - contact us with an enquiry or to discuss our products or services, or ask us to contact you;
  - register to use our Site;
  - logon to one of our websites;
  - subscribe to our service(s);
  - request communications to be sent to you;
  - participate in discussion boards or other social media functions on our Site;
  - apply for a position with EPOS;
  - visit our premises;
  - partner with us or engage with us on a project;
  - enter a competition, promotion or survey;
  - report a problem with our Site.
- **Automated technologies or interactions.** As you interact with our Site, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar



technologies. In some cases, this may form part of Aggregated Data as discussed above. Please see our cookie policy for further details.

- **Third party sources.** We will receive personal data about you from various third parties as set out below:
  - if you use any of the other websites we operate or the other services we provide, we may receive Technical and Usage Data from them. In this case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this Site.
  - we work closely with third parties (including, for example, business partners, sub-contractors in technical and delivery services, analytics providers, search information providers) and may receive Contact, Profile Technical and Usage Data about you from them.

### 3. How we use your personal data

We will only use your personal data in order to perform a task for our official functions, and the task or function has a clear basis in law. We also make use of contractual, legitimate, and consent-based processing. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract, we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a business, statutory or legal obligation.

Our Glossary below provides more information about the types of lawful basis that we will rely on to process your personal data.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party communications to you via email or text message. You have the right to withdraw consent to communications at any time by contacting us. **Change of purpose**

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.



## **4. Communications**

We strive to provide you with choices regarding certain personal data uses, particularly around communications.

### **4.1 Direct communications from us**

We may use your Contact, Identity, Professional, Profile, Technical and Usage Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you.

### **4.2 What might our communications cover?**

Our communications may include the following:

- updates on EPOS research, data, products and services
- promotion of EPOS facilities and events
- promotion of EPOS generally
- information to raise awareness of EPOS employment vacancies and research opportunities
- request for feedback on EPOS products and events

### **4.3 Opting out**

You can ask us to stop sending you messages at any time by following the opt-out links on any message sent to you or by contacting us at any time.

Where you opt out of receiving these messages, this will not apply to personal data provided to us as a result of a product/service purchase or other similar transaction.

## **5. Cookies**

Our Sites uses cookies to distinguish you from other users of our Sites. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our Site. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie policy.

### **Disclosure of your information**

We may share your personal data:

- If we are under a duty to do so in order to comply with any legal obligation;
- To enforce or apply our terms of use in other agreements and obligations and other agreements;



- To protect the rights, property, or safety of us, our employees, our customers, or others;
- To detect, investigate and help prevent security threats, fraud or other malicious activity (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

## 6. International transfers

Where we share personal information inside EEA, we'll make sure we put in place suitable safeguards to ensure compliance with the GDPR, such as technical measures, contractual agreements or data-sharing agreements

If we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We may transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring personal data out of the EEA.

## 7. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.



## **8. Data retention**

### **8.1 How long will you use my personal data for?**

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see the section on your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please contact us if you require further information as to the details of retention periods for different aspects of your personal data.

## **9. Your legal rights**

### **9.1 What are your legal rights**

Under certain circumstances, you have rights under data protection laws in relation to your personal data. These rights are listed below. Further information about each of these rights is set out in our Glossary below.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

### **9.2 No fee usually required**





You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

### 9.3 What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

### 9.4 Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 10. Glossary

### 10.1 Lawful basis

**Comply with a legal obligation** means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

**Legitimate Interest** means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

**Performance of Contract** means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

### 10.2 Third parties

We may share your personal information with:

- Our information technology service providers (including email service providers) that provide us with the information technology services we require.

### 10.3 Your legal rights



You have the right to:

**Request access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

**Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for communications purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer** of your personal data to you. We will provide to you your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

