

Your personal data is processed by Joint Controllers in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95 / 46 / EC (hereinafter referred to as “GDPR”) and data protection legislation in our particular countries.

## 1. WHO WE ARE

At SUSTRACK project, accessible from <https://www.sustrack.eu>, one of our main priorities is the privacy of our visitors. This Privacy Policy document contains information about personal data that is collected and recorded by consortium members of the SUSTRACK project and how we use it.

The partners of the SUSTRACK consortium, listed below, process certain types of personal data for the purposes of the project. Each partner is responsible for the personal data they collect and process during their activities under the framework of the project:

- UNIVERSITA DEGLI STUDI DI ROMA UNITELMA SAPIENZA (ITALY)
- STICHTING WAGENINGEN RESEARCH (NETHERLANDS)
- KNOWLEDGE SRL (ITALY)
- PEDAL CONSULTING SRO (SLOVAKIA)
- DBFZ DEUTSCHES BIOMASSEFORSCHUNGSZENTRUM GEMEINNUTZIGE GMBH (GERMANY)
- UNIVERSITEIT GENT (BELGIUM)
- FUNDACION TECNALIA RESEARCH & INNOVATION (SPAIN)
- FVA SAS DI LOUIS FERRINI & C (ITALY)
- UNIVERSITA DEGLI STUDI DI FERRARA (ITALY)
- BUNDESANSTALT FUER MATERIALFORSCHUNG UND - PRUEFUNG (GERMANY)
- FUNDACION CIRCE CENTRO DE INVESTIGACION DE RECURSOS Y CONSUMOS ENERGETICOS (SPAIN)

For further information, we can be contacted at: [dataprotection@sustrack.eu](mailto:dataprotection@sustrack.eu).

## 2. HOW DO WE COLLECT PERSONAL DATA?

We collect personal data both directly and indirectly:

Directly we obtain personal data directly from you in a variety of ways, including but not limited to the following cases when you:

- subscribe to our newsletter/s;
- register to attend meetings and events we host and during attendance at such events;
- establish cooperative relationships with us;
- provide professional services pursuant to our contract with the European Commission;
- participate in an interview or survey organized by us.
- Indirectly we obtain personal data from a variety of sources, including:

- our research partners;
- our networks and contacts;
- public and open data sources such as public registers, news articles and internet searches;
- social and professional networking sites (e.g., LinkedIn).

### 3. WHAT TYPE OF DATA DO WE COLLECT?

We only collect the personal data that are necessary for a proper implementation of our project, our cooperation and communication with you. These data fall into the following categories:

- contact details (name, surname, e-mail address, street address, mobile phone number, landline phone number);
- professional information (job title, organization, field of expertise);
- videos and photos during our events.

### 4. BASIS OF LAWFUL PROCESSES

Legal Basis	Purposes
Legal obligations	<ul style="list-style-type: none"> <li>• Ensuring our compliance with both national and European legislation as well as with the specific legal and regulatory framework of the Horizon Europe Framework Programme for Research and Innovation of the EU stems,</li> <li>• Reporting to the European Commission to comply with the project's publicity obligations.</li> </ul>
Consent	<ul style="list-style-type: none"> <li>• Conducting research (e.g., interviews, surveys);</li> <li>• Dissemination our project's results to different types of stakeholder;</li> <li>• Sending invitations and providing access to guests attending our events and webinars;</li> <li>• log files for analytics trends, administering the site, tracking users' movement on the website, and gathering demographic information.</li> </ul>
Contractual obligations	<ul style="list-style-type: none"> <li>• Processing online requests or queries, including responding to communications from individuals;</li> </ul>
Legitimate interest	<ul style="list-style-type: none"> <li>• Processing personal data required to solve potential legal disputes.</li> </ul>

## 5. SECURITY MEASURES TO ENSURE PERSONAL DATA PROTECTION

We continuously apply a personal data risk assessment process to identify, analyze, and evaluate the security risks that may threaten your personal data. Based on the results of this risk assessment, we define and apply a set of both technical and organizational measures to mitigate the above security risks, including but not limited to:

- Data Protection Policies to guide our personnel when processing your data;
- Written contracts with organizations that process personal data on our behalf;
- Non-Disclosure Agreements with our personnel;
- Back up process, antimalware protection, access control mechanisms, etc.
- Some of our partners have appointed a Data Protection Officer.

## 6. SHARING YOUR PERSONAL DATA WITH THIRD PARTIES

We may occasionally share your personal data with trusted third parties to help us deliver efficient and quality services. When we do so, we ensure that recipients are contractually bound to safeguard the data we entrust to them before we share the data. We may engage with several or all the following categories of recipients:

- Parties that support us as we provide our services (e.g., cloud-based software services such as Dropbox, Microsoft SharePoint, Google);
- Our professional advisers, including lawyers, auditors, and insurers;
- Dissemination services providers (e.g., MailChimp);
- Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with applicable law or regulation;
- The European Commission according to our relevant contractual obligations.

SUSTRACK project's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options. You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

## 7. DO WE TRANSFER YOUR PERSONAL DATA OUTSIDE THE EUROPEAN ECONOMIC AREA?

We do not own file servers located outside the European Economic Area (EEA). However, some partners may use cloud and / or marketing services from reputable providers such as SharePoint, DropBox, MailChimp, Google, etc., situated both inside and outside the EEA. We always check that such providers comply with the relevant GDPR requirements before starting using their services.

With effect from 20 September 2023, the USA provides adequate guarantees in the protection of personal data based on Decision EK2023/1795.

## 8. COOKIES

Our websites use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies. To learn more, please refer to our cookie policy.

Cookies are small text files which are saved on your computer, mobile phone or tablet.

They allow the website to remember your actions and preferences (such as login, language, font size and other display preferences) so you don't have to keep re-entering them whenever you come back to the site. You can control and/ or delete cookies as you wish. If you do this, however, you may need to manually adjust your preferences every time you visit a site. For more information on how to manage cookies, please visit: <http://www.aboutcookies.org/>

Third-party ad servers or ad networks use technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on SUSTRACK project, which are sent directly to users' browsers. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit. Note that SUSTRACK project has no access to or control over these cookies that are used by third-party advertisers.

## 9. CHILDREN INFORMATION

SUSTRACK project does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will promptly remove such information from our records.

## 10. YOUR RIGHTS

We will retain your personal information only for as long as it is necessary for the purposes set out in this Privacy Policy. Under GDPR, as a data subject you have certain rights applicable to our data processing:

- The right to access to understand what personal data we process
- The right to correction of your personal data that we process
- The right to object data processing (might be limited due to other legal obligations we have)
- The right for restriction (might be limited due to other legal obligations we have)
- The right to be forgotten (might be limited due to other legal obligations we have)
- The right to withdraw consent

If you wish to be informed what personal data we hold about you, if you wish to withdraw your consent or to have your data deleted from our systems, please contact us at [dataprotection@sustrack.eu](mailto:dataprotection@sustrack.eu).