

# Application for joining the EOSC Association Privacy Policy

The **EOSC Association (CESAER, CSIC, GÉANT and GARR)**, also referred to in this document as the **Data Controller**, is committed to protecting the online privacy of the applicants to the Application for joining the EOSC Association. As such, this Privacy Policy has been written in order to allow you to understand **Data Controller’s** policy regarding your privacy, as well as how your personal information will be handled. This Privacy Policy will also provide you with information so that you are able to consent to the processing of your personal data in an explicit and informed manner, where appropriate.

In general, any information and data which you provide to **Data Controller**, in the context of the use of Application for joining the EOSC Association as better defined in [Section 3](#) below, will be processed by the Data Controller in a lawful, fair and transparent manner. To this end, and as further described below, the Data Controller takes into consideration internationally recognised principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimisation, data quality and confidentiality.

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### 1. Data controller

The **EOSC Association (CESAER, CSIC, GÉANT and GARR)**, as identified at the top of this Privacy Policy, are the Data Controller regarding all personal data processing carried out through the Application Webform. You can contact **Data Controller** with any questions related to this Privacy Policy or the **Data Controller’s** personal data processing practices by sending a written communication to [eoscassociation@eoscsecretariat.eu](mailto:eoscassociation@eoscsecretariat.eu).

## 2. Personal Data processed

When you use the Web form, **Data Controller** will collect and process information regarding you (as an individual) which allows you to be identified either by itself, or together with other information which has been collected.

This information may be classified as “**Personal Data**” and can be collected by **Data Controller** both when you choose to provide it (e.g., when you request Services provided by **Data Controller**) or simply by analysing your behaviour.

Personal Data which can be processed by **Data Controller** are as follows:

### a. Name, contact details and other Personal Data

You will be asked to submit information about yourself, such as your name, professional title, organisation name/type, primary (and secondary) domain of work/expertise, e-mail address, city/country of residence, address, gender, Twitter handle, LinkedIn profile, short bio and picture. Mandatory fields will be marked as such in the online registration forms – it is not possible to process your registration if any of the mandatory fields are left incomplete.

In addition, whenever you communicate with the **EOSC Association** by submitting a general enquiry, as well as whenever you participate in surveys which may be available on the Website, **Data Controller** may collect additional information which you choose to provide.

### b. Browsing data

The Website’s operation, as is standard with any websites on the Internet, involves the use of computer systems and software procedures, which collect information about the Website’s users as part of their routine operation. While **Data Controller** does not collect this information in order to link it to specific users, it is still possible to identify those users either directly via that information, or by using other information collected – as such, this information must also be considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your device, the type of device, the URI (Uniform Resource Identifier) addresses of resources you request on the Website, the time of requests made, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on.

These data are used to compile statistical information on the use of the Website, to ensure its correct operation, as well as restore backup from possible failures of the Website and identify any faults and/or abuse of the Website. Save for this last purpose, these data are not kept for more than 90 business days.

### c. Cookies

*- Definitions, characteristics, and application of standards*

Cookies are small text files that may be sent to and registered on your computer by the websites you visit, to then be re-sent to those same sites when you visit them again. It is thanks to these cookies that those websites can “remember” your actions and preferences (e.g., login data,

language, font size, other display settings, etc.), so that you do not need to configure them again when you next visit the website, or when you change pages within a website.

Cookies are used for electronic authentication, monitoring of sessions and storage of information regarding your activities when accessing a website. They may also contain a unique ID code which allows tracking of your browsing activities within a website, for statistical or advertising purposes. Some operations within a website may not be able to be performed without the use of cookies which, in certain cases, are technically necessary for operation of the website.

When browsing a website, you may also receive cookies from websites or web servers other than the website being visited (i.e., “**third-party cookies**”).

There are various types of cookies, depending on their characteristics and functions, which may be stored on your computer for different periods of time: “**session cookies**”, which are automatically deleted when you close your browser, and “**persistent cookies**”, which will remain on your device until their pre-set expiration period passes.

According to the law which may be applicable to you, your consent may not always be necessary for cookies to be used on a website. In particular, “**technical cookies**” – i.e. cookies which are only used to send messages through an electronic communications network, or which are needed to provide services you request – typically do not require this consent. This includes browsing or session cookies (used to allow users to login) and function cookies (used to remember choices made by a user when accessing the website, such as language or products selected for purchase).

On the other hand, “**profiling cookies**” – i.e., cookies used to create profiles on users and to send advertising messages in line with the preferences revealed by users while browsing websites – typically require specific consent from users, although this may vary according to the applicable law.

#### *- Types of cookies used by the Website*

The Website uses the following types of cookies:

- **Browsing or session cookies**, which are strictly necessary for the Website’s operation, and/or to allow you to use the Website’s content and Services.
- **Analytics cookies**, which allow **Data Processor** to understand how users make use of the Website, and to track traffic to and from the Website.
- **Function cookies**, which are used to activate specific Website functions and to configure the Website according to your choices (e.g., language), in order to improve your experience.
- **Profiling cookies**, which are used to observe the preferences you reveal through your use of the Website and to send you advertising messages in line with those preferences.

**Data Processor** also uses **third-party cookies** – i.e. cookies from websites / web servers other than the Website, owned by third parties. These third parties will either act as independent data controllers from **Data Processor** regarding their own cookies (using the data they collect for their own purposes and under terms defined by them) or as data processors for **Data Processor** (processing personal data on **Data Processor**’s behalf). For further information on how these third parties may use your information, please refer to their privacy policies:

- **Google**
  - **Privacy Policy:** <https://www.google.com/policies/privacy/partners/>;

- **Cookie Policy:** <https://policies.google.com/technologies/cookies?hl=en-US>;
- **Opt-out Mechanism:** <https://tools.google.com/dlpage/gaoptout>.
- **LinkedIn**
  - **Privacy Policy:** <https://www.linkedin.com/legal/privacy-policy>;
  - **Cookie Policy:** <https://www.linkedin.com/legal/cookie-policy>;
  - **Opt-out Mechanism:** [https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=microsites-frontend\\_legal\\_cookie-policy](https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out?trk=microsites-frontend_legal_cookie-policy).
- **Twitter**
  - **Privacy Policy:** <https://twitter.com/en/privacy>;
  - **Cookie Policy:** <https://help.twitter.com/en/rules-and-policies/twitter-cookies>;
  - **Opt-out Mechanism:** <https://help.twitter.com/en/rules-and-policies/twitter-cookies>.

- *First-party cookies present on the Website*

In detail, the cookies present on the Website are as follows:

Technical name	Data Controller	Cookie type, function and purpose	Type of cookie	Duration
_GA	Google	Google Analytics cookie used to distinguish users.	third party cookie/cookie analytics	2 Years
_gid	Google	Google Analytics cookie used to distinguish users.	third party cookie/cookie analytics	24 hours
_gat_gtag_UA_136588840_1	Google	Google Analytics cookie used to throttle request rate.	third party cookie/cookie analytics	1 minute
has_js	<b>Data Controller</b>	Functional cookie to remember whether a visitor has javascript in his browser	first party cookie/browsing cookie	Expires at the end of the session
Cookie-agreed	<b>Data Controller</b>	Cookie that records whether the cookies notification pop-up has been acknowledged by a user	first party cookie/browsing cookie	100 days

- *Cookie settings*

You can block or delete cookies used on the Website via your browser options. Your cookie preferences will be reset if different browsers are used to access the Website. For more information on how to set the preferences for cookies via your browser, please refer to the following instructions:

- [Chrome](#)
- [Firefox](#)
- [Internet Explorer](#)
- [Safari](#)

You may also provide set your preferences on third-party cookies by using online platforms such as [AdChoice](#).

**CAUTION:** If you block or delete **technical** and/or **function cookies** used by the Website, the Website may become impossible to browse, certain services or functions of the Website may become unavailable or other malfunctions may occur. In this case, you may have to modify or manually enter some information or preferences every time you visit the Website.

### 3. Purposes of processing

**Data Controller** intends to use your Personal Data, collected through the Web form, for the following purposes:

1. To allow you to express your interest to join the EOSC Association as a member or observer, to send you informative newsletters and other communications, to respond to your enquiries and requests for support, and to provide any other Services which you may request ("**Service Provision**");
2. To include information on you as a registered Member within the EOSC Association database ("**Database Publication**");
3. For marketing, promotional and publicity purposes, including to carry out direct marketing, market research and surveys, via e-mail, through push notifications / pop-up banners, , as well as events hosted by selected third parties ("**Marketing**");
4. For future marketing, promotional and publicity purposes, by sending you direct e-mail marketing communication regarding events hosted and Services provided by the EOSC Association ("**Soft Opt-in**");
5. To create a profile of you as a member or observer, through the use of profiling cookies and by collecting and analysing information on the preferences you select and choices you make in the Web form. This profile will be used to give you information about other websites / services you may be interested in, and to show you information and advertisements which may be relevant to you and your interests. All algorithms involved in this processing are regularly tested, to ensure the processing's fairness and control for bias ("**Profiling**");
6. For compliance with laws which impose upon **Data Controller** the collection and/or further processing of certain kinds of Personal Data ("**Compliance**");
7. For development and administration of the Website, in particular by use of data analytics regarding how you and other users make use of the Website, as well as the information and feedback you provide, to improve our offerings ("**Analytics**");
8. To prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website, including by carrying out internal audits ("**Misuse/Fraud**").

### 4. Grounds for processing and mandatory / discretionary nature of processing

**Data Controller's** legal bases to process your Personal Data, according to the purposes identified in Section 3, are as follows:

1. **Service Provision:** processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you – Art. 6(1)(b) GDPR. It is

not mandatory for you to give **Data Controller** your Personal Data for these purposes; however, if you do not, **Data Controller** will not be able to provide any Services to you.

2. **Database Publication:** processing for this purpose is based on your consent – Art. 6(1)(a) GDPR. It is not mandatory for you to give **Data Controller** your Personal Data for these purposes; however, if you do not, **Data Controller** will not be able to provide any Services to you.
3. **Applications:** processing for this purpose is needed in order for **Data Controller** to be able to consider your application and, therefore, is necessary to take steps at your request before (potentially) entering into a contract – Art. 6(1)(b) GDPR. It is not mandatory for you to give **Data Controller** your Personal Data for these purposes; however, if you do not, **Data Controller** will not be able to consider your applications.
4. **Marketing:** processing for these purposes is based on your consent – Art. 6(1)(a) GDPR. It is not mandatory for you to give consent to **Data Controller** for use of your Personal Data for these purposes, and you will suffer no consequence if you choose not to give it (aside from not being able to receive further marketing communications from **Data Controller**). Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).
5. **Soft Opt-In:** processing for these purposes is based on **Data Controller**'s interest in sending you direct e-mail marketing communication regarding events and Services provided by **Data Controller** and which are identical or similar to those you have previously signed up for or acquired through the Website – Art. 6(1)(f) GDPR. You can block these communications, and you will suffer no consequence if you do so (aside from not being able to receive further communications from the Website), by objecting through the link provided at the bottom of all such communications.
6. **Profiling:** processing for this purpose is based on your consent, collected by means of the cookie pop-up banner and/or a specific tick box – Art. 6(1)(a) GDPR. It is not mandatory for you to give consent to **Data Controller** for use of your Personal Data for this purpose, and you will suffer no consequence if you choose not to (aside from not being able to benefit from greater personalisation of your user experience regarding the Website). Any consent given may also be withdrawn at a later stage (please see [Section 8](#) for more information).
7. **Compliance:** processing for this purpose is necessary for **Data Controller** to comply with its legal obligations – Art. 6(1)(c) GDPR. When you provide any Personal Data to **Data Controller**, **Data Controller** must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.
8. **Analytics:** Information collected for this purpose is used to allow **Data Controller** to understand how users interact with the Website and to improve the Website accordingly, with the aim to providing a better user experience – Art. 6(1)(f) GDPR.
9. **Misuse/Fraud:** Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Website (for potentially criminal purposes) – Art. 6(1)(f) GDPR.

## 5. Recipients of Personal Data

Your Personal Data may be shared with the following list of entities (“**Data Processors**”) engaged in order to provide or support the Website and Services (e.g., hosting providers, e-mail platform providers, technical maintenance providers Website administrators and Website user administrators):

- **Trust-IT Services Ltd** (contact: [privacy@trust-itservices.com](mailto:privacy@trust-itservices.com)), located at Chase Green House, 42 – Chase Side, Enfield, Middlesex, EN2 6NF United Kingdom, VAT no. 848450895 (“**Processor**” on behalf of Trust-IT Srl).
- **COMMpla Srl** (contact: [privacy@commpla.com](mailto:privacy@commpla.com)), located at Via Nino Bixio 25, 56125 Pisa, Italy. VAT no. 01958380501 (“**Processor**” on behalf of Trust-IT Srl).

Your Personal Data may be shared with the following list of persons / entities (“**Recipients**”):

- Persons, companies or professional firms providing the **EOSC Association (CESAER, CSIC, GÉANT and GARR)** with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services and which act typically as data processors on behalf of the **Data Controller**;
- Persons authorised by **Data Controller** to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., members of the team operating the Website, and other functions with access to Personal Data processed via the Website);
- Public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities.

Additionally, with your consent, some of your Personal Data may be published in the webpages available online at the Website. Furthermore, when you sign-up for an event, you will be listed in attendee lists made available on the Website.

More information on these transfers is available upon written request to the Website Managing Team at the following address: [eoscassociation@eoscsecretariat.eu](mailto:eoscassociation@eoscsecretariat.eu)

## 6. Transfers of Personal Data

Considering the worldwide relevance of the **EOSC Association (CESAER, CSIC, GÉANT and GARR)**, your Personal Data may be transferred to Recipients located in several different countries.

**Data Controller** implements appropriate safeguards to ensure the lawfulness and security of these Personal Data transfers, such as by relying on adequacy decisions from the European Commission, standard data protection clauses adopted by the European Commission, or other safeguards or conditions considered adequate to the transfer at hand.

More information on these transfers is available upon written request to **Data Controller** at the following address: [eoscassociation@eoscsecretariat.eu](mailto:eoscassociation@eoscsecretariat.eu).

## 7. Retention of Personal Data

Personal Data processed for **Service Provision** will be kept by **Data Controller** for the period deemed strictly necessary to fulfil such purposes – in any case, as these Personal Data are processed for the provision of the Services, **Data Controller** may continue to store this Personal Data for a longer period, as may be necessary to protect **Data Controller's** interests related to potential liability related to the provision of the Services.

Personal Data processed for **Applications** will be kept by **Data Controller** for up to 5 years, to allow for possible external audits from the European Commission, as requested by contractual provisions the Data Controller is subjected to. **Data Controller** may contact applicants before the expiration of this period, in order to request an extension of the retention period.

Personal Data processed for **Database Publication, Marketing and Profiling** will be kept by **Data Controller** from the moment you give consent until it is withdrawn. Where it is not withdrawn, consent will be renewed at fixed intervals. Once consent is withdrawn (or not given, following a renewal), Personal Data will no longer be used for these purposes, although it may still be kept by **Data Controller** in particular as may be necessary to protect **Data Controller's** interests related to potential liability related to this processing.

Personal Data processed for **Soft Opt-In** will be kept by **Data Controller** from the moment where it is provided by you to **Data Controller** (in the context of registrations for events or Services requested via the Website) until you object to this processing. Once you have objected, Personal Data will no longer be used for these purposes, although it may still be kept by **Data Controller**, in particular as may be necessary to protect **Data Controller's** interests related to potential liability related to this processing.

Personal Data processed for **Compliance** will be kept by **Data Controller** for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for preventing **Misuse/Fraud** will be kept by **Data Controller** for as long as deemed strictly necessary to fulfil the purposes for which it was collected.

More information on applicable retention periods is available upon written request to the Website Managing Team at the following address: [support@eosccsecretariat.eu](mailto:support@eosccsecretariat.eu).

## **8. Data subjects' rights**

As a data subject, you are entitled to exercise the following rights before **Data Controller**, at any time:

1. Access your Personal Data being processed by **Data Controller** (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data;
2. Correct or update your Personal Data processed by **Data Controller**, where it may be inaccurate or incomplete;
3. Request erasure of your Personal Data being processed by **Data Controller**, where you feel that the processing is unnecessary or otherwise unlawful;
4. Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
5. Exercise your right to portability: the right to obtain a copy of your Personal Data provided to **Data Controller**, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller;

6. Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent **Data Controller** from processing your Personal Data; or
7. Withdraw your consent to processing (for **Marketing, Database Publication, Soft Opt-in, and Profiling**).

Please note that most of the Personal Data you provide to **Data Controller** can be changed at any time, including your e-mail preferences, by accessing, where applicable, your user profile created on the Website.

You can also withdraw consent for **Marketing** (for communications received via e-mail) or object to **Soft Opt-In** by selecting the appropriate link included at the bottom of every marketing e-mail message received. The same applies to the Website's newsletter which you may have subscribed to and receive as a Service.

Consent for **Profiling** carried out by cookies may be withdrawn as described in [Section 2 \(e\)](#). Where consent for **Profiling** was given via a specific tick box, you may withdraw this consent by changing your preferences, at any time, within your user profile created on the Website, where applicable.

Aside from the above means, you can always exercise your rights described above by sending a written request to the Website Managing Team at the following address: [eoscassociation@eossecretariat.eu](mailto:eoscassociation@eossecretariat.eu).

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Website is unlawful.

## 9. Amendments

This Privacy Policy entered into force on 07.08.2020.

**Data Controller** reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. The Website Managing Team will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. The Website Managing Team therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how **Data Controller** collects and uses Personal Data.