

PRIVACY POLICY

1. Who we are:

HNN3.0 is an 84-month project funded by the European Commission within the framework of the Horizon Europe Framework Programme.

HNN3.0 will coordinate actions with relevant initiatives and offer tools in order to improve the professionalization and skills of the Cluster 1 (CL1) National Contact Points (NCPs) across Europe, simplifying applicants' access to Horizon Europe (HE) calls and raising the average quality of submitted proposals.

The HNN3.0 consortium partners, listed below, are joint controllers of the personal data processed by the project. Each partner is responsible for the personal data they collect and process during their activities under the framework of the project:

N°	Role	Short name	Legal name	Ctry
1	COO	APRE	AGENZIA PER LA PROMOZIONE DELLA RICERCAEUROPEA	IT
2	BEN	AICIB	AICIB - AGENCIA DE INVESTIGACAO CLINICA EINOVACAO BIOMEDICA	PT
3	BEN	hub.brussels	AGENCE BRUXELLOISE POUR L'ACCOMPAGNEMENTDE L'ENTREPRISE	BE
4	BEN	RIF	IDRYMA EREVNAS KAI KAINOTOMIAS	CY
5	BEN	DLR	DEUTSCHES ZENTRUM FUR LUFT - UND RAUMFAHRT	DE
6	BEN	EKT	ETHNIKO KENTRO TEKMIRIOSIS KAI ILEKTRONIKOUPERIECHOMENOU	EL
7	BEN	ETAg	SIHTASUTUS EESTI TEADUSAGENTUUR	EE
8	BEN	NCBR	NARODOWE CENTRUM BADAN I ROZWOJU	PL
9	BEN	HRB	THE HEALTH RESEARCH BOARD	IE
10	BEN	ISCIII	INSTITUTO DE SALUD CARLOS III	ES
11	BEN	Rannis	RANNSOKNAMIDSTOD ISLANDS	IS
12	BEN	MESRI	MINISTRE DE L'ENSEIGNEMENT SUPERIEUR, DE LA RECHERCHE ET DE L'INNOVATION	FR
13	BEN	TC CAS	TECHNOLOGICKE CENTRUM AKADEMIE VED CESKEREpubliky	CZ
14	BEN	LZP	LATVIJAS ZINATNES PADOME	LV
15	BEN	LMT	Lietuvos mokslo taryba	LT
16	AP	UKRI	UNITED KINGDOM RESEARCH AND INNOVATION	UK
17	AP	Euresearch	VEREIN EURESEARCH	CH

For further information, we can be contacted via email at: hnn3.0@apre.it.

2. How we collect your personal data

We collect personal data both directly and indirectly:

Directly. We obtain personal data directly from individuals in a variety of ways, including but not limited to the following cases:

- an individual subscribes to our newsletter/s;
- an individual registers to attend in meetings and events we host and during attendance at such events;
- we establish cooperative relationships with an individual;
- we provide professional services pursuant to our contract with the European Commission;
- an individual participates in an interview or survey organized by us.

Indirectly. We obtain personal data indirectly about individuals from a variety of sources, including:

- our partners' research;
- 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).
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3. What types of data we collect?

We only collect the data that are necessary for the smooth implementation of our project. This data falls into the following categories:

- **contact details** (name/surname, e-mail address, street address, mobile phone number, land line phone number);
- **professional information** (job title, organisation, field of expertise);
- **demographics** (e.g. age, gender, nationality);
- **information about what a person knows or believes.**
- **videos and photos** (from people that attend our events).

4. Bases of lawful processing

We process personal data on the following legal bases:

Legal obligations - for processing activities required for compliance both with applicable 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 European Union.

Consent – for processing activities such as organisation of surveys and interviews, completing of questionnaires and dissemination of project's results.

Contractual obligations - for processing activities such as reporting to the European Commission and complying with the project's publicity obligations.

5. What we do with your personal data

We process your personal data for the purpose of:

- Conducting research (e.g. interviews, surveys);
- Dissemination of our project's results to different types of stakeholder;
- Sending invitations and providing access to guests attending our events and webinars;
- Administering, maintaining, and ensuring the security of our information systems, applications, and websites;
- Processing online requests or queries, including responding to communications from individuals;
- Complying with contractual, legal, and regulatory obligations.

6. How we secure your personal data when we process it

We continuously apply a personal data risk assessment process to identify, analyse, 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 organisational 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 organisations 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.

7. Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. When we do so, we ensure that the 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 Microsoft Sharepoint);
- Our professional advisers, including lawyers, auditors, and insurers;
- Dissemination services providers (e.g., MailChimp);

- [EEN](#) supporting with specific country profile validation during Brokerage Events under CL1.
- 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.

8. **Do we transfer your personal data outside the European Economic Area?**

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

9. **Do we use 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.

10. **Your rights**

You have the following rights regarding our processing of your personal data:

- **Right to withdraw consent** – You can withdraw consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right of access** – You can ask us to verify whether we are processing personal data about you and, if so, to have access to a copy of such data.
- **Right to rectification and erasure** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you or ask us to erase your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- **Right to restriction of processing** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- **Right to data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another entity.
- **Right to object** – You can object to our use of your personal data for direct marketing purposes, including profiling or where processing has taken the form of automated decision-making. However, we may need to keep some minimal information (e.g., e-mail address) to comply with your request to cease marketing to you.
- **Right to make a complaint to your local Data Protection Authority (DPA)** (see https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm) regarding any concerns you may have about our data handling practices.

To ask us to do anything of the above, you can contact us by email: hnn3.0@apre.it. We will promptly examine your request against the relevant requirements of the laws and regulations governing privacy and personal data protection and we will answer the latest within 30 days after receiving your request. We will ask from you some kind of identification (e.g. photocopy of your identity card or passport) to avoid non-authorized exposure of your personal data. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within 30 days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline.

11. How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations, and contractual obligations to which we are subject. Please note that we have an obligation to retain data concerning projects funded by the Horizon Europe Framework Programme for Research and Innovation for up to five years after the end of the project (unless further retention is requested by auditors). After the expiry of the retention period, and unless further legitimate grounds for retention arise, we will dispose of personal data in a secure manner.

12. Disclaimer of liability for third party websites

Although our site may contain links to third-party sites, including the sites of the consortium partners, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site's responsible personnel. We suggest you read the privacy policy of each website you interact with, before allowing the collection and use of your personal data.

We may also provide social media features that allow you to share information on your social networks and interact with our project on various social media sites. The use of these social media features may result in the collection or sharing of information about you. We recommend that you check the privacy policies and regulations of the social networking sites you interact with, so that you can be sure that you understand what information may be collected, used and disclosed by these sites.

13. Revisions of this Privacy Policy

This Privacy Policy is valid from **01/12/2022** and replaces any other previous notifications that we had issued in the past regarding our personal data management practices. We reserve the right to revise this Policy at any time. The current version will be always uploaded to our website indicating the date of entry into force, so you know when the most recent revision took place. If there are critical changes in this policy or our personal data practices change significantly in the future, we will post the changes on our website.