

ECHO WEB PRIVACY POLICY

Information to be provided (art. 13 GDPR)

You are currently visiting the ECHO Web Privacy Policy.

This website <https://echonetwork.eu/> (the "Site") is hosted and managed by ECHO Partner **SEMMELWEIS EGYETEM**, an Hungarian university having its registered office at 26 Üllői str. (Hungary). The content of the site is generated by the ECHO project.

This privacy policy informs you of our policies regarding the collection, use and disclosure of personal information/data we receive from users of the Site. In the following sections, we explain how we collect, use and protect your personal data in compliance with the provisions of European Regulation 2016/679 ("GDPR"). We also explain what rights you have about your personal data and how you can exercise those rights.

Who are we?

European network of **Cybersecurity centres and competence Hub** for innovation and **O**perations. ECHO delivers an organized and coordinated approach to improve proactive cyber defense of the European Union, through effective and efficient multi-sector collaboration. The Partners will execute on a 48-month work plan to develop, model and demonstrate a network of cyber research and competence centers, with a centre of competence at the hub.

What is personal data?

Data Subject is an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

Personal Data means any information relating to an identified or identifiable natural person.

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Who is the Data Controller and Data Protection Officer?

The **Data Controller** is the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.



The **Data Processor** is a natural or legal person, public authority, agency or other body, which processes personal data on behalf of the Data Controller.

The **Data Protection Officer** is a person with expert knowledge of data protection law and practices assisting the Data Controller or Data Processor to monitor internal compliance with GDPR. Such DPO, whether or not is an employee of the controller, should be in a position to perform due tasks in an independent and timely manner.

RHEA SYSTEM SA (RHEA), established in avenue Einstein 8 - Wavre 1300 (Belgium), is the Data Controller for the ECHO project and will manage personal data thanks also the establishment of a Privacy Team and the nomination of an ECHO DPO (Data Protection Officer).

Data subject can contact the Data Controller and DPO to the following email – addresses:

Data Controller Contact: echo.project@rheagroup.com

Data Protection Officer Contact: echo.data.protection.officer@rheagroup.com

How do we collect your personal data?

Your personal data on this website can be directly when you voluntarily submit it after giving your consent.

It can be collected indirectly when collecting information such as the number of visitors, last visit date and consulted pages. Please refer to the [Cookies Policy](#).

What kind of personal data do we collect?

The following types of personal data are collected, stored, and used:

1. **Information about browsing data:** your IP address, geographical location, browser type and version, operating system, length of visit, page views and website navigation paths;
2. **Information to join ECHO Network:** personal identifiable information that you enter in order to apply to different types of subscriptions:
 - Title (Mr, Mrs, Miss), Name, Surname *[always mandatory]*
 - E-mail *[always mandatory]*
 - Name and type of your organization *[mandatory only for certain subscription]*
 - Information channel used to know about ECHO *[always voluntary]*

Which is the scope and purpose of the collection, processing and utilization of personal data?

All use of your collected personal data is confined to the purposes stated below and is only undertaken to the extent necessary for these purposes.

When you visit ECHO website

Information about browsing data: We collect some data to help us find out things like how many people visit our site, how they navigate around our site, the pages that are most visited.



The work described in this document has been conducted within the ECHO project. This project has received funding by the European Union's Horizon 2020 research and innovation programme under grant agreement No. 830943.

We use Google Analytics to track user interaction with our website. See the [Cookies Policy](#) detailed explanation.

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 the 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: 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.).

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.

When you request to join ECHO Network

Information to send a request: the personal identifiable information, you fill out in the form request to join ECHO Network, will become part of the website database managed by SEMMELWEIS EGYETEM. Contact details will be used to contact you and information about your organization is used to evaluate your request and prepare contractual documents if needed.

What are the legal grounds for processing your personal data and mandatory / discretionary nature of processing?

RHEA will collect, use and share only the aforementioned personal data and for the purposes specified.

We can summarize our **legal basis** for processing your personal data as follows:

1. **Performance of a contract with you – Art. 6 (1.b) GDPR**, for processing personal identifiable information in order to implement your benefits and duties linked to the [ECHO Participants](#) or [ECHO Partners](#) type of subscription. It is not mandatory for you to give your Personal Data for these purposes; however, if you do not, RHEA will not be able to process your subscription request.
2. **Your consent – Art. 6 (1.a) GDPR**, for processing personal identifiable information in order to implement your benefits and duties linked to [ECHO Club Members](#) and [ECHO Newsletter](#) type of subscription.
3. **Legitimate Interests - Art. 6 (1.f) GDPR**, for processing browsing data. Our legitimate interests include:



- Understand how users interact with the Website and to improve the Website accordingly, with the aim to providing a better user experience;
 - Improving efficacy of the ECHO website;
 - prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website;
4. **Legal obligations – Art. 6(1)(c) GDPR**, for processing personal identifiable information 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.

What about storage, access and transfer of personal data?

Personal Information which you supply to us is generally stored and kept in servers located in Budapest, Hungary.

However, due to the nature of our global business and the technologies required (some cloud-based tools), your Personal Information may be transferred to internal or external third party located outside the EEA, in countries where there may be a lower legal level of data protection.

In such situations, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We include the standard contractual clauses approved by the European Commission for transferring personal information outside the EEA into our contracts with those third parties;
- We ensure that the country in which your personal information will be handled has been deemed "adequate" by the European Commission;
- We carefully validate any requests for information from law enforcement or regulators before disclosing the information;
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US. For further details, see European Commission: EU-US Privacy Shield.

RHEA shall give access to your personal information only to trusted partners or services providers who require the use of such information for business purposes. These third parties are entities for whom we have established they have adequate and sufficient data protection and security controls in place and with whom we have also implemented contractual obligations to ensure they can only use your data to provide services to RHEA limited to the purposes listed above. Moreover, these third parties shall not use or process your Personal Data for any purpose other than to provide the Service to RHEA.

Your Personal Data is shared with the following list of Data Processors:

1. Entities engaged in order to provide or support the Website and Services (e.g., hosting providers, e-mail platform providers, technical maintenance providers):
 - **SEMMELEWEIS EGYETEM**, ECHO Partner for maintenance and statistical purposes;
 - **SendInBlue**, software (GDPR compliant) for newsletter management.
2. Third part entities engaged for success factors demonstration:
 - **Third party analytics**, namely Google analytics. Please take vision of the [Cookies Policy](#).



Personal data will not be transferred to government bodies or public authorities except in order to comply with mandatory national legislation or if the transfer of such data should be necessary in order to take legal action in cases of fraudulent access to our network infrastructure.

Personal data will not be transferred for any other purposes.

RHEA will not pass on or sell your personal data to third parties for their own marketing purposes.

Which period the personal data will be stored for?

Personal data will be retained for a limited period of time as long as we need it to fulfill the purposes for which we have initially collected it, unless otherwise require by law.

We will not retain your Personal Data for longer than required. This means that we will keep your Personal Data for any or a combination of periods described as follows: **(i)** for as long as required by law, **(ii)** until we no longer have a valid reason for keeping it, **(iii)** until you request us to stop using it. When we delete your Personal Data from our databases, it will remain in our backup system until it cycles out.

Please note that by law certain kinds of data must be kept for a certain period of time. Such data must be stored by us until these periods run out. We block this data in our system and use it only in order to fulfil statutory requirements. In any case all personal data will be removed 5 years after the conclusion of the project (as agreed with the EC in the Grant Agreements of the four projects).

What about the consent requested in this web site?

Your consent is optional but if you don't provide the requested information, please mind that the Data Controller can't contact you.

By consenting to this privacy notice you are giving us permission to process your personal data specifically for the purposes identified.

You can withdraw your consent at any time by sending an email to: echo.data.protection.officer@rheagroup.com

What are the security measures applied to handle personal data?

Any personal data processed by **SEMMELEWEIS EGYETEM** is kept on secure servers. SEMMELEWEIS EGYETEM uses reasonable administrative, technical, personnel, and physical measures to safeguard personal data against loss, unauthorized access, use, disclosure, or modification and to ensure the integrity of the personal data. Additionally, SEMMELEWEIS EGYETEM ensures to process your personal data only for the purposes mentioned in this privacy notice and to keep data no longer than necessary.

This website is subject to the SEMMELEWEIS EGYETEM Information Security Policy, aiming at safeguarding the confidentiality, integrity, availability, authenticity and non-repudiation of information and information systems. SEMMELEWEIS EGYETEM implements technical and organizational security measures to safeguard stored personal data against inadvertent or deliberate manipulation, loss or destruction and against access by unauthorized persons.



What are my rights as a data subject?

While we are in possession of, or processing your personal data, you, the data subject, have the following rights:

- **Right of access** – you have the right to request a copy of the information that we hold about you.
- **Right of rectification** – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- **Right to be forgotten** – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- **Right to processing restriction**– where certain conditions apply to have a right to restrict the processing.
- **Right of portability** – you have the right to have the data we hold about you transferred to another organisation.
- **Right to object** – you have the right to object to processing activities not described in this policy.
- **Right to object to automated processing, including profiling** – you also have the right to object to be subject to the legal effects of automated processing or profiling.
- **Right to judicial review** – in the event that RHEA refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain.

You can enforce your rights by sending an e-mail with the relevant request to echo.data.protection.officer@rheagroup.com

We draw your attention to the fact that if your data is deleted, it will no longer be possible to be contacted to participate to our activities.

What are the conditions for acceptance, validity and modification of data protection policy?

The first version of this Web Privacy Policy was into force on 01/02/2019.

The Data Controller reserves the right to update its content.

The Website Managing Team (SEMMELEWEIS EGYETEM) 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 Web 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 we collect and uses Personal Data.

Last update of this Web Privacy Policy is on 14/04/2020.

