



**DATA PROTECTION POLICY for the**  
EGI Advanced Computing for EOSC (EGI-ACE) Project  
for developing the ENES DATA SPACE, which delivers an open,  
scalable and cloud-enabled data science environment for climate data  
analysis on top of the EOSC Compute Platform.

CMCC Foundation is totally compliant with EC Data Protection Directive (EC Directive 95/46), GDPR 679/2016, the Italian Personal Data Protection Code Legislative Decree no. 196 of 30 June 2003 and the Italian DL. 101/2018. It must point out that CMCC has appointed an external Privacy Data Manager because it is not required to appoint a DPO putting up of less than 250 employees.

*(1) NATURE OF PERSONAL DATA:*

Fondazione CMCC may process the following data: name, surname, community user identifier, preferred username and user entitlement. In addition, the login timestamp information will be added.

The personal data does not belong to special categories of Data.

*(2) PURPOSES OF PROCESSING:*

Fondazione CMCC will process personal data for the purposes of the H2020 (H2020-INFRAEOSC-2018-2020) and in particular for developing the ENES DATA SPACE service, as required in the proposal Project: EGI-ACE proposal PartB\_1-3 (Pag. 47, T5.2 Climate research).

The ENES Data Space is leveraging the EGI Check-in service for authentication. Personal data related to identity and access management is sent by the user home organisation and transmitted to the ENES Data Space via the EGI Check-in service, based on the consent of the user.

The processing of the username is necessary for scientific research purposes in accordance with Article 89 (1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subjects.

Particularly, Fondazione CMCC will process:

- Community User Identifier and preferred username for statistical purposes related to the EGI-ACE project (Virtual Access metrics);
- User entitlement to deal with security aspects related to the service;
- All other received data will not be processed nor stored.



### (3) *DATA CONTROLLER*

The Data Controller for the processing activities covered by this Privacy Notice is CMCC Foundation.

### (4) *LEGAL BASIS FOR PROCESSING:*

The legal basis for processing personal data is: Legitimate interests pursued by the controller or by a third party according to Art. 6 (1) (f) GDPR.

The information will be available only for the CMCC Employees authorized to manage Personal data of EGI-ACE.

### (5) *STORAGE PERIOD:*

The personal data will be processed during the lifetime of the ENES DATA SPACE. The processing is necessary for scientific research Project and for a 5-year period, counting from the end of the project as described in the EGI-ACE project and the EGI-ACE Grant Agreement n. 101017567 art. 39.

### (6) *SAFEGUARDS:*

Fondazione CMCC ensures that both physical and technical measures will be taken for the protection of the personal data which are going to be displayed or processed during the lifetime of ENES DATA SPACE. The safeguards are: the existence of an Ethics Board of CMCC, an internal code of Ethics and Conduct, and controlled password-protected access to personal computers and to databases containing personal data.

### (7) *RIGHTS OF THE DATA SUBJECTS:*

You can exercise the following rights at any time by contacting our data protection officer using the contact details provided in the *Contact* section:

- Information about your data stored with us and their processing
- Correction of incorrect personal data
- Deletion of your data stored by us
- Objection to the processing of your data by us

### (8) *LEGISLATION:*

Applicable legislation is the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC) and the Legislative Decree no.101 of 2018/08/10 which has incorporated the GDPR in the national legal framework (Legislative Decree no. 196 of 2003/06/30).

You can complain at any time to the supervisory data protection authority (DPA) responsible for you. Your responsible DPA depends on your country and state of residence, of your workplace or of the presumed violation.



(9) *CONTACT:*

Fondazione CMCC, located in Lecce (Italy), +39-0832 288650, [privacy@cmcc.it](mailto:privacy@cmcc.it)

Lecce, 8 giugno 2022

CMCC Foundation  
The President

Dr. Antonio Navarra