

ENVRI Catalogue of Services (CoS) PRIVACY POLICY

DISCLAIMER: this document is a draft. If you access it, you are visiting a testing environment which is not meant to be publicly accessed. We'll do our best to protect your privacy anyway, but proceed at your own risk.

1. Information about us and this policy

1.1. Introduction

The ENVRI Catalogue of Services (CoS) is developed by the European Plate Observing System [European Research Infrastructure Consortium](https://www.epos-eu.org/epos-eric)¹ (EPOS ERIC) and hosted by EGI Foundation² through its subsidiary Laboratory of Instrumentation and Experimental Particle Physics³ (LIP) in the framework of the ENVRI HUB NEXT project - GA n.101131141, funded by the European Commission under the Horizon Europe Programme. EPOS ERIC (EPOS) is committed to protecting and respecting your privacy. This policy (add url) - and any other documents referred to in it - sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. This policy aims to give you information on how EPOS collects and processes your personal data, through your use of the CoS. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. The CoS is not intended for children and we do not knowingly collect data relating to children.

1.2. Data Controller

For the purpose of the General Data Protection Regulation (Regulation (EU) 2016/679) and any replacement or amending legislation, the data controller is EPOS ERIC. EPOS ERIC has appointed a data protection officer (DPO) who is responsible for overseeing, ensuring and monitoring data protection compliance in accordance with this privacy policy. If you have any questions about this privacy policy, including any requests to exercise your legal rights, please contact the DPO using the details given below. If you have a question or concern about how your personal information is being handled then please contact our DPO. You also have a right to raise issues with the Italian Data Protection Authority.

1.3. Contact Details

If you have any questions about this policy or how we are handling your personal information, please contact our DPO below:

Dr. Lucio Badiali, Ph.D
Data Protection Officer
EPOS ERIC (c/o INGV)
Via di Vigna Murata 605
00143 Roma
Data Protection Officer email: dpo@epos-eric.eu

¹ <https://www.epos-eu.org/epos-eric>

² <https://www.egi.eu/egi-foundation/>

³ <https://www.lip.pt/?lang=en§ion=home&page=homepage>

Data Controller email: info@epos-eu.org

You have the right to make a complaint at any time to the supervisory authority for data protection (DPA), the Garante per la protezione dei dati personali. We would, however, appreciate the chance to deal with your concerns before you approach the DPA so please contact us in the first instance.

Garante per la protezione dei dati personali

Piazza Venezia n. 11 - 00187 Roma

Ph: (+39) 06.696771

Fax: (+39) 06.69677.3785

DPA email: protocollo@gpdp.it

1.4. Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. This version was last updated on XXXX. Historic versions can be obtained by contacting us at [info\[at\]epos-eu.org](mailto:info[at]epos-eu.org). It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

1.5. Third-party links

The CoS may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy policy of every website you visit.

2. Information we may collect about you

2.1. Usage of personal data

The CoS does not collect personal information of users. Some services listed in the catalogue may require authentication and authorization; the ENVRI Hub provides the ENVRI ID service for this purpose (you can find the relative privacy policy at XXX); the CoS transfers the authorization token to the requesting service without additional manipulation.

The CoS stores personal information of service providers. The onboarding process of a Research Infrastructure (RI) or similar institution into the ENVRI Hub includes the activation of one or more authorized accounts to the metadata backoffice application. This application stores name, email and affiliation of appointed people that are allowed to add/modify metadata of the RI services onboarded.

As you interact with the CoS, we will automatically collect Technical and Usage Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies and other similar technologies. Please see our cookie policy ([add link](#)) for further details. We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get any explanations regarding the processing, please contact us.

2.2. Cookies

The CoS uses cookies to distinguish you from other users of our Sites. This helps us to provide you with a good experience when you browse our Site and also allows us to improve our platform. You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For detailed information on the cookies, we use and the purposes for which we use them see our Cookie policy.

3. Disclosure of your information

We may share your personal data:

- If we are under a duty to do so in order to comply with any legal obligation;
- To enforce or apply our terms of use in other agreements and obligations and other agreements;
- To protect our rights, our property, or our safety, or those of our employees, our customers, or others;
- To detect, investigate and help prevent security threats, fraud or other malicious activity (this includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction).

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

4. Data security

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

5. Data retention

5.1. How long will you use my personal data for?

We will only retain your personal data for a maximum of five years. Within this period, we will keep them only as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from

unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data: see the section on your legal rights below for further information.

In some circumstances we may anonymise and/or aggregate your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

Please contact us if you require further information as to the details of retention periods for different aspects of your personal data.

6. Your legal rights

6.1. What are your legal rights

European law grants users a number of rights in relation to the use, storage and modification of personal data collected. Further information about each of these rights is set out in our Glossary below.

- Request access to your personal data.
- Request correction of your personal data.
- Request erasure of your personal data.
- Object to processing of your personal data.
- Request restriction of processing your personal data.
- Request transfer of your personal data.
- Right to withdraw consent.

If you wish to exercise any of the rights set out above, please contact us.

6.2. No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

6.3. What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

6.4. Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

7. Glossary

7.1. Lawful basis

Comply with a legal obligation means processing your personal data where it is necessary for compliance with a legal obligation that we are subject to.

Legitimate Interest means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the best and most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law). You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

Performance of Contract means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.

7.2. Third parties

We may share your personal information with our information technology service providers (including email service providers) that provide us with the information technology services we require.

7.3. Your legal rights

You have the right to:

- Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for communications purposes. In some cases, we may demonstrate that we have

compelling legitimate grounds to process your information which override your rights and freedoms.

- Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - If you want us to establish the data's accuracy.
 - Where our use of the data is unlawful but you do not want us to erase it.
 - Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
 - You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.
- Request the transfer of your personal data to you. We will provide to you your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.