

## **APRE Privacy Policy for “Research and Innovation for the Future of Europe” initiative**

### Data controller

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In compliance with the GDPR and on the basis of its organization chart, APRE has defined and formalized an Organizational Model of privacy related liability aimed at the correct processing of personal data.

Beyond the above Organizational Model relating to liability on privacy matters, all those who are in charge of a project/activity that provides for the processing of personal data are required to adopt an ad hoc policy tailored on the specific needs of the case (so-called Privacy by Design).

When processing personal data, authorized staff are required to observe the following general principles:

Dignity of the data subject, i.e. the natural person whom the personal data is about

- *Lawfulness, accuracy and transparency*: personal data must be processed in a lawful, accurate and transparent way, in order to guarantee to the data subject adequate security, including protection, through appropriate technical and organizational measures, from unauthorized or unlawful processing and from accidental loss, destruction or damage. With regard to transparency, all information intended for the public or to the data subject must be concise, easily accessible and easily understood; the language used must be simple and clear.
- *Purpose limitation*: the purposes of the processing must be certain, explicit and legitimate, and subsequently processed in a way that is not incompatible with such purposes (without prejudice to further processing for archiving purposes in the public interest or for scientific or historical research purposes; or for statistical purposes).
- *Data minimization*: the data collected must be adequate, relevant and limited to what is necessary with respect to the purposes for which they are processed. Specifically, information systems and computer programs must be configured by minimizing the use of personal data, so as to exclude their processing when the purposes pursued in individual cases can be achieved through anonymous data or other appropriate ways to identify the data subject only in case of necessity ('necessity principle').
- *Accuracy*: the data processed must be accurate and, if necessary, updated, therefore all reasonable steps must be taken to delete or edit inaccurate data in relation to the purposes for which they are processed.
- *Retention limit*: the data processed must be stored in a form that allows identification of the data subject for a period not longer than the necessary to achieve the purposes for which they are collected and processed

(unless specific law providing for archiving processing in the public interest or for scientific or historical research purposes, or for statistical purposes).

- *Integrity and confidentiality*: the data must be processed in such a way as to guarantee adequate security of personal data, including protection, by means of appropriate technical and organizational actions, from unauthorized or unlawful processing, loss, destruction and accidental damage

## What data do we collect?

In the “Research for Europe” initiative APRE collects the following kind of data:

- Personal identification information (i.e. Name, surname, email address, Organization, position and Country)
- Information relating name, surname, organization, position and country will be published on the website or shared with specific subjects who act in the framework of the initiative.

## How do we collect your data?

Data are collected only through the support form on the official website (<https://www.researchforeurope.eu/>) from participants who give us the informed consent (GDPR Art. 6.a ).

## How do we store your data?

APRE establishes how to store the data according to the principle of data protection by design. Therefore, before each activity, through a process of risk assessment and if necessary impact assessment, the company defines the most suitable measures to ensure the data protection. Generally, data are securely stored in protected cloud or hard disks placed in locked closet in the company sites. If necessary data are encrypted and when it is possible, they are pseudonymized ((UE 679/2016 art. 4.5). The backup of the data avoids the data loss in the case of hard disk breakage.

Data are kept limited to what is necessary in relation to the purposes of the “Research and Innovation for the Future of Europe” initiative. Once the declared period has expired, the data are deleted.

## Who has access to data?

The data may be processed only by internal personnel, or data processor duly authorized and instructed to process (GDPR Art.29)

Information relating name, surname, organization, position and country will be published on the website or shared with specific subjects who act in the framework of the initiative.

## What are the data protection rights? (art. 15-20 GDPR)

**The right to access:** participants have the right to request APRE for copies of their personal data.

**The right to rectification:** participants have the right to request that APRE corrects any information they believe is inaccurate. They have also the right to request APRE to complete the incomplete information.

**The right to erasure:** participants have the right to request that APRE erases their personal data, under certain conditions.

**The right to restrict processing:** participants have the right to request that APRE restricts processing of personal data, under certain conditions.

**The right to object to processing:** participants have the right to object to APRE processing of personal data under certain conditions.

**The right to data portability:** participants have the right to request that APRE transfers the data collected to another organization, or directly to them, under certain conditions.

If participants submit any question, APRE is committed to answer within a month. If they would like to exercise any of these rights, they can contact APRE at: [bruxelles@apre](mailto:bruxelles@apre).

## Changes of our privacy policy

APRE keeps its privacy policy under regular review and places any updated on this page. This privacy policy was last updated on 07/01/2019.

## How to contact us

If participants have any questions about APRE privacy policy, the data that APRE hold on them, or they would like to exercise one of the data protection rights do not hesitate to contact us.

Email [bruxelles@apre.it](mailto:bruxelles@apre.it)

Phone: +39 06 48939993 / +32 (0)2 290 22 71

Address: Via Cavour 71 – 00184 Rome Italy

## How to contact the appropriate authority

If any participant feels that APRE has not addressed his concern in a satisfactory manner, he may contact the Italian Data Protection Authority.