

## CyberHubs Privacy Policy Statement

We take your privacy very seriously. Please read this privacy notice carefully as it contains important information on who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or relevant supervisory authorities in the event you have a complaint.

We collect, use and are responsible for certain personal data about you. When we do so we are subject to the **General Data Protection Regulation**, which applies to the processing of personal data in the context of the activities of an establishment of a controller or a processor in the Union. We are responsible as 'controller' of that personal information for the purposes of those laws.

By submitting any personally identifiable information to us, you consent and agree that we may collect, use and disclose such personally identifiable information in accordance with this Privacy Notice, and as permitted or required by law, and may disclose the information to a third party, such as business partners, or as otherwise authorised under applicable law.

### PERSONAL DATA WE COLLECT ABOUT YOU

We may collect and use the following personal data about you:

- Your name and contact information, including email address and telephone number, job title and company/organisation details.
- Information to enable us to check and verify your identity, e.g. your date of birth.
- In relation to specific projects, we may collect information including your nationality, geographical location such as city, region, or country; gender, age, sector of employment.
- Your responses to surveys, competitions and promotion of events.
- Any special requirements or points of interest you indicate during your registration to events.

### HOW YOUR PERSONAL DATA IS COLLECTED

We collect most of this personal data directly from you—in person, by telephone, text or email and via our website. In particular, we may collect information in the following cases: The European Commission's support for the production of this publication does not constitute an endorsement of the contents, which reflect the views only of the authors, and the Commission cannot be held responsible for any use which may be made of the information contained therein.

#### 1. If you answer our CyberHubs Survey:

- We may collect your personal data when you respond to the CyberHubs survey. Contact us with individual questions about the survey through the CYberHubs email address info(at)cyberhubs(dot)eu or email addresses of the CyberHubs partners.

#### 2. If you subscribe to our newsletter or if you contact the project partners directly:

- We may collect your personal data when you subscribe to our newsletter via the newsletter subscription form. Contact us with individual questions through the email addresses provided on the CyberHubs partners' websites.



- We may collect information from cookies on our website. For more information on our use of cookies, please see our cookies policy below. In addition, we may collect, use and share anonymous data such as statistical information about the use of the Site.

3. If you are an external stakeholder seeking information about CyberHubs and our activities:

- We may collect your name and contact information, including but not limited to name, surname, job title, business/email address and telephone number following the exchange of business cards or when you request orally or in writing to be added to our mailing list.
- We may use your details to contact you about CyberHubs activities, programmes and events and to organise such activities, programmes and events.

#### HOW AND WHY WE USE YOUR PERSONAL DATA

- Under data protection law, we can only process your personal information if we have a proper reason for doing so, e.g.:
- to comply with our legal and regulatory obligations;
- or the performance of our contract with you or to take steps at your request before entering into a contract;
- for our legitimate interests or those of a third party. A legitimate interest is when we have a business or commercial reason to use your information, so long as this is not overridden by your own rights and interests; or
- where you have given consent such as in the case of specific projects where your data is shared for reporting purposes (for example with the European Commission) and for targeted communications. Any special category of personal data is only processed with your explicit consent.

We do not sell or otherwise disclose personal data we collect about you, except as described in this Privacy Notice or as we disclosed to you at the time the personal data is collected. Please contact us for a detailed overview of what we use your personal data for and our reasons for doing so.

#### PROMOTIONAL COMMUNICATIONS AND OPT-OUT

We may use your personal data to send you email updates about the project progress, activities and events. We have a legitimate interest in processing your personal data for promotional and marketing purposes. This means we do not usually need your consent to send you promotional communications. However, where consent is needed, we will ask for this consent separately and clearly.

We will always treat your personal information with the utmost respect and never share it with other organisations for marketing purposes. Your personal information may be shared with project partners for project-related purposes only.

You have the right to opt-out of receiving promotional communications at any time by contacting us at [info@softwareskills.eu](mailto:info@softwareskills.eu).

#### WHO WE SHARE YOUR PERSONAL DATA WITH

We routinely share personal information with:

- partners involved in the development and the implementation of the European Software Skills Alliance (ESSA) project;
- third parties we use to help deliver our services to you (such as distribution mailing services, event mailing services);



- other third parties we use to help us run our project and partner organisations involved, e.g. marketing agencies or website hosts, third parties related to the employment of our staff etc.;
- third parties approved by you, e.g. social media sites you choose to link your account to or third-party payment providers;
- our banks in relation to our legal statutory obligations under Belgian law.

We only allow our service providers to handle your personal data if we are satisfied, they take appropriate measures to protect your personal data. We also impose contractual obligations on service providers relating to ensure they can only use your personal data to provide services to us and to you. We may also share personal information with external auditors, e.g. in relation to accreditation and the audit of our accounts. We may also disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

#### WHERE YOUR PERSONAL DATA IS HELD

Personal data may be held at the offices of the project partners and those of our third-party agencies, service providers, representatives and agents as described above.

Some of these third parties may be based outside the European Union. To deliver services to you, it is sometimes necessary for us to share your personal data outside the EU, e.g.:

- with your and our service providers located outside the EU;
- if you are based outside the EU;
- with services providers used to provide services to our members' legitimate interests

These transfers are subject to appropriate safeguards as outlined in Article 46 GDPR. If you would like further information, please contact our Data Protection Officer.

#### HOW LONG YOUR PERSONAL DATA WILL BE KEPT

We will keep your personal data for the duration of the European Software Skills Alliance (ESSA) project or for as long as we are providing services to you. Thereafter, we will keep your personal data for as long as is necessary:

- to respond to any questions, complaints or claims made by you or on your behalf;
- to show that we treated you fairly;
- to keep records required by law.

We will not retain your personal data for longer than necessary for the purposes set out in this notice.

#### YOUR RIGHTS

You have the following rights, which you can exercise free of charge: Access (Art. 15 GDPR)  
Rectification (Art. 16 GDPR)

To be forgotten (Art. 17 GDPR)

Restriction of processing (Art. 18 GDPR)

Data portability (Art. 20 GDPR)

The right to be provided with a copy of your personal information (the right of access).

The right to require us to correct any mistakes in your personal information.

The right to require us to delete your personal information in certain situations.

The right to require us to restrict processing of your personal information in certain circumstances, e.g. if you contest the accuracy of the data.

The right to receive the personal information you provided to us, in a structured, commonly used and



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To object (Art. 21 GDPR)

machine-readable format and/or transmit that data to a third party in certain situations.

The right to object:

at any time to your personal information being processed for direct marketing (including profiling); in certain other situations to our continued processing of your personal information, e.g. processing carried out for the purpose of our legitimate interests.

Not to be subject to automated individual decision-making (Art. 22 GDPR)

The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you.



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