



MEMORANDUM

Privacy Policy

Article 1. General information about Bionanopolys project

Bionanopolys project (the “Project”) is a research project funded by the European Union in the framework of the Horizon 2020 programme under grant agreement no 953206. The Project aims at creating a network of pilot plant and complementary services to speed up the introduction of biobased nano-enabled materials into the market through a Single Entry Point. It will strengthen the circularity of nano-enabled bio-based materials (NEBM) in the economy launching and promoting an Open Innovation Test Bed (OITB) to develop innovative bionanocomposites from main feedstocks in Europe and bio-based nanoproducts in relevant sectors such as polymers, packaging, textile, agriculture, cosmetics, pharma, hygiene, food and additive manufacturing.

Article 2. Definitions

Applicable Law means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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 (GDPR), and any local legislation supplementing it or equivalent to it

Data Controller means the data controller within the meaning of the Applicable Law.

Personal data means the personal data within the meaning of the Applicable Law.

Processing means the processing within the meaning of the Applicable Law.

Project means the Bionanopolys project.

Project partners: means the 27 beneficiaries involved in the Project, including Instituto Tecnológico del Embalaje, Transporte y Logística (ITENE), Asociación de Investigación de la Industria Textil (AITEK), Fundación CIDAUT, Centre technique de l'industrie des papiers, cartons et celluloses (CTP), Centro de nanotecnología e materiais técnicos funcionais e inteligentes associacao (CENTITVC), Saechsisches Textilforschungsinstitut e.V (STFI), Bioprocess pilot facility (BPF), ACIB GmbH, Politechnika Wroclawska (PWR), Institutul national de cercetaredezvoltare pentru microtehnologie (IMT), Commissariat à l'énergie atomique et aux énergies alternatives (CEA), Technology solutions, Sociedad limitada (IRIS), Ghent University (UGENT), Biotrend Inovacao E Engenharia, Particula Group Ltd., (PARTICULA), European business and innovation centre network (EBN), European Business Angel Network (EBAN), Gil Robles – San Bartolome & Partners (G&S), Axia Innovation SRL (AXIA), Ambrosialab SRL, HTSM Hilados técnicos san Miquel (HTSM), TEXTISOL S.L., NOVAMONT SPA, Danipack Industria de plásticos SA (DANIPACK), DS Smith Plc (DS), CELLMAT TECHNOLOGIES SL, and Logoplaste Innovation Lab (LDA).

Article 3. Project's commitment regarding the protection of personal data

This Privacy Policy published on the Project website explains why and how we collect, record, organise, structure, store, adapt or alter, retrieve, consult, use, disclose, align or combine, restrict, erase or destroy your personal data provided when you participate in the Project, visit the Project website or interact with us. This Privacy Policy also instructs you how to exercise your rights relating to your personal data.

We undertake in particular to respect the following principles:

1. Your personal data are processed lawfully, fairly, and transparently, in accordance with the Applicable Law;



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2. Your personal data are collected for specific, explicit and legitimate purposes and are not further processed in way incompatible with these purposes, in accordance with the Applicable Law;
3. Your personal data are stored in an appropriate and relevant manner and are limited to what is necessary to the purposes for which they are processed, in accordance with the Applicable Law;
4. Your personal data are accurate, kept up to date and all reasonable steps are taken to ensure that inaccurate data, having regard to the purposes for which they are processed, are erased or rectified without delay, in accordance with the Applicable Law;
5. In accordance with the Applicable Law, we implement appropriate technical and organisational measures to ensure appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

Furthermore, we contractually impose the same level of personal data protection on our subcontractors (service providers, suppliers, etc.).

Article 4. Categories of personal data which may be collected and processed by the Project

1. General data

When participating in the Project, we may collect and process the following categories of personal data:

- a. **Name and other identifying information:** name, gender, age;
- b. **Your contact details:** e-mail address, telephone number;
- c. **Your academic information:** title, function, education, sector of activity, name of affiliated institution, degree level;
- d. **Information collected when you use the Project website:** personal information that is collected automatically when you use the Project website such as IP information, browser type and information relating to the page you last visited;
- e. **Your intervention:** recording of verbal intervention at events, recording of written and oral opinions in surveys, images.
- f. **Our communication with you:** communication, communication preferences (unsubscribing from newsletters, etc.), registration of your questions, survey, research, complaints or phone calls.

2. Cookies and similar technologies

When you use the Project website, we may collect information via cookies and similar technologies.

Cookies are alphanumeric identifiers which are downloaded onto your computer's hard drive by the website which you are visiting. When this information is stored on your hard drive, our system is able to recognise your device, save information about visits and visitors and automatically log you in where appropriate. Cookies are used by the Project so that we can make it easier for you to access the Project website.

Cookies can be utilised to make visiting a website more personal, by, for instance:

- Displaying relevant navigation settings;
- Remembering visitor's preferences;
- Improving the overall user experience;
- Limiting the number of advertisements shown

The Project website uses first party cookies which are set by its web server as oppose to a different web server. We use the following types of cookies and technologies:



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- **Essential website cookies:** are strictly necessary to the operation of the website. Because these cookies are strictly necessary to deliver the Project website to you, you cannot refuse them. You can block or delete them by changing your browser settings however.
- **Performance cookies:** help us to enhance the performance and functionality of the Project website and detect any bugs you may encounter. These cookies collect anonymous information about the usage of the Project website (time spent on each page, number of visits per page, error messages shown, etc.).
- **Google Analytics:** is a web analytics service provided by Google, Inc. (“Google”), and is used by us to help the website analyse how you use the site. The information generated about your use of the Project website, including your IP address which is anonymised for Member States of the European Union and for other parties to the Agreement on the European Economic Area, will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Project website, compiling reports on the website activity for us and providing other services relating to website activity and internet usage.
- **Google Fonts:** is used without authentication and no cookies are sent to the Google Fonts API. If you have an account with Google, none of your Google account data will be transmitted to Google while using Google Fonts. Google only records the use of CSS and the fonts used and stored this data securely. More information about these can be found at <https://developers.google.com/fonts/faq>. The categories collected by Google and the purposes of this collection can be found at <https://policies.google.com/privacy?hl=en>.

By clicking “agree” when the cookie notice is shown, you thereby give consent for cookies to be placed and read on www.bionanopolys.eu and the associated sub-domains.

We do not use cookies to collect personal information about you. Should you wish to restrict or block cookies which are set by the Project website, you can do this through your browser settings. You can visit the “Help” section of www.aboutcookies.org which contains comprehensive information on how you can do this on a wide variety of browsers.

Please be aware that restricting cookies may impact on the functionality of the Project website.

Article 5. Purposes of the collection

Personal data or information provided to us is used for the following purposes:

1. **Dissemination of the Project:** We use your personal data to communicate with you in a view to discussing, dialoguing, cooperating, performing the Project and sharing the Project results.
2. **Allowing you to participate in survey:** Your personal data will be used to allow you to participate in survey in the framework of the Project.
3. **Allowing you to participate in events:** Your personal data will be used to allow you to participate in events organised in the framework of the Project.
4. **Compilation of statistics:** We collect, store and use your personal data for compilation of research statistics.
5. **Communication with you:** We use your personal data to contact with you (newsletters, privacy policy, responses to your requests, etc.).



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6. **Communication of research events:** We may use your personal data for purposes of marketing for research events such as (i) to send you information about research events organised in the framework of other projects conducted by the Project partners, (ii) to send you information about research events organised by third parties.
7. **Training and Knowledge transfer:** Your personal data will be used to allow you to participate in trainings and knowledge transfer system organised in the framework of the Project.

Article 6. Legal basis of the collection and processing of your personal data

We collect and process your personal data on the basis of your explicit consent. Your consent may be always withdrawn at any time in accordance with Article 9 below. In such case, be aware that the withdrawal of your consent shall not affect the lawfulness of the previous processing based on your consent before the withdrawal. Furthermore, if you refuse to provide us with some of your personal data or if you provide us with incomplete or inaccurate information required for your participation in the Project, be aware that we may not be able to provide or deliver you all or part of the Project, which you may have requested from us.

Article 7. Management, Quality and Storage of your personal data

Your personal data will be updated in accordance with your requests. As soon as they are received, we undertake to update your personal data so that they remain correct and up to date.

We will retain your personal data collected on our system in the period of the Project or up to fulfilling the purposes for which it was collected or in so far as such data is necessary to the compliance with statutory obligations and to solve any dispute or until the information provided are required to be deleted by you. The retention of your personal data shall not exceed a period of ten (10) years.

Article 8. Potential recipient of your personal data

1. Potential recipient of your personal data

Your personal data will be shared with the Project partners. We may also disclose your personal data to third parties such as service providers or the Project sponsor pursuant to the Project's purposes determined in Article 5.

We will use the best endeavours to ensure that such other parties who are involved in the collection, processing and disclosure of personal data will observe and adhere this Privacy Policy.

The disclosure of personal data to sub-contractor will be conducted on a contractual basis where requires and ensures the protection of your personal data in accordance with this Privacy Policy and the Applicable Law.

2. Transfers of your personal data to non-EU countries

You are informed that your personal data will be transferred to the Project partner located outside the European Union, namely the United Kingdom.

Furthermore, we may transfer your personal data to third parties located outside the European Union in order to be processed and stored.

The transfers of your personal data to non-EU countries will be based on your explicit consent for such transfers.

Article 9. Your rights to the personal data collected



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Subject to the Applicable Law, you, as the personal data subjects, have the following rights:

a. The right of access

You have the right to ask us, at any moment, for confirmation that certain of your personal data are processed by us, as well as to provide you with certain information such as the categories of personal data concerned, the purposes of the processing and the recipients of those data.

b. The right of rectification

You have the right to obtain from us the rectification of inaccurate or incomplete personal data concerning you.

c. The right to be forgotten

You have the right to obtain the erasure of your personal data stored by us in accordance with the Applicable Law, such as in situations where your personal data are no longer necessary to the initial purposes for which they were processed as well as situations where these data were processed unlawfully.

d. The right to restriction of processing

You have the right to obtain from us a limitation of the processing of your personal data without deleting the concerned personal data in the conditions in accordance with the Applicable Law.

e. The right to data portability

You have the right to recover some of your personal data for your own use or to transmit them to another organisation in the conditions in accordance with the Applicable Law.

f. The right to withdraw consent

You have the right to withdraw your consent for the processing of your personal data at any time. You shall be aware that the withdrawal of consent shall not affect the lawfulness of the previous processing based on your consent before the withdrawal.

g. The right to lodge a complaint

You have the right to lodge a complaint to the competent authorities in the event of violation by us of the Applicable Law regarding the protection of personal data.

You can exercise your rights listed above by sending a postal mail or an e-mail to our contact point provided in Article 11.

Once your request has been received, we undertake to respond to the request as soon as possible, within one (1) month from receipt of the request.

Article 10. Security measures for protecting personal data

To secure the safety of personal information from a loss, theft, leak, falsification, or damage, we undertake technical, managerial and physical measures, in particular, by storing and managing the important personal information in password protected mode, ensuring that the number of persons having access to the data is limited to what is necessary for the Project to achieve its expected objectives, and operating an exclusive organisation for protecting personal information.

We shall not be held responsible for the consequences that may arise from the shortcomings and negligence that are caused by the personal data subject.



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Article 11. The Data Controller and the contact point

Depending on the Project work packages in which you are involved, the Data Controller can be any of the 27 Project partners.

In order to exercise your rights or to send any queries relating to this Privacy Policy, please contact our contact point.

Name: Mrs. Katrin Weinhandl

E-mail: katrin.weinhandl@acib.at

Address: ACIB GmbH, Krenngasse 37, 8010 Graz, Austria

Article 12. Amendment of the Privacy Policy

We reserve the right to amend this Privacy Policy from time to time if necessary. Any amendments, supplements of this Privacy Policy shall be sent to you and posted on the Project website. You may object to these amendments, supplements by exercising your rights set out in Article 9.

This Privacy Policy is last updated on [dd/mm/yy]

Article 13. Applicable Law and Jurisdiction

This policy is governed exclusively by [...].

If you feel that your complaint to us has not been followed up, you can refer the matter to the Data Protection Authority at the following address: