

## PRIVACY POLICY

**1. Who is concerned by this privacy policy?** Every visitor of the PACKALLIANCE website, people who use our services, e.g. who subscribe to our newsletter, participate in a workshop/conference/seminar organized in the framework of the PackAlliance Project, as well as people who email us directly for project related matters.

**2. What information about you do we handle, why do we handle that information, what is the legal basis for the processing and for how long do we retain the information?**

The data processing that we conduct is there because either you have consented to it or for performance of a task carried out in the public interest in the framework of the PackAlliance project.

*a. When you make use of our website:*

We use a third-party service, Google Analytics, to collect standard internet log information and details of visitor behavior patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone. We do not make any attempt to find out the identities of those visiting our website. If we do want to collect personally identifiable information through our website, we will be up front about this. We will make it clear when we collect personal information and will explain what we intend to do with it.

This data processing is based on your consent (article 6.1.a of the GDPR).

You have the right to withdraw your consent at any time (see Your Rights hereunder).

*b. When you register for newsletters from the PackAlliance website:*

Based on your consent (article 6.1.a) of the GDPR):

- For the delivering of our newsletters and for being able to contact you when organizing project events dedicated to external stakeholders. You may unsubscribe from our newsletters/e-mails at any time. We will not keep your data once you have unsubscribed.

*c. When you email us or contact us directly:*

We process your contact details, when required, in order to provide you with the requested support. All our emails are archived for audit purposes for the duration of our audit obligations.

This data processing is based on your consent (article 6.1.a of the GDPR).

*d. When you contact us to make use of your data subject rights:*

We process your contact details and the proof of your identity you send us in order to address your request. We can also, depending on your request, process other personal data we have collected also in order to address your request.

This data processing is for compliance with legal obligations to which we are subject (article 6.1.c of the GDPR).

We will store those data for the duration of three years starting at the 1st Jan of 2020. This duration aims at having history of the case, in case the data subject comes back with further request. Further, all our emails are archived for audit purposes for the duration of our audit obligations (project contractual terms).

*e. We can also collect data that you otherwise made public in order to contact you when we think it is relevant for your and for us.*

This data processing is based on our legitimate interests and aims at creating collaboration in our fields of activities (article 6.1.f of the GDPR).

We retain those data as long as they are relevant.

### **3. How do we protect your personal data?**

Your personal data are handled in full confidentiality. We make all necessary effort to take technical and organizational measures that might be required so as to ensure security of your personal data.

### **4. How long is the information retained for?**

All incoming emails gathered from the PackAlliance contact forms are archived for the period of the project running and 5 years after the end of the project, as an audit under our Framework Agreement with the European Commission could be issued. Official starting date of the project was January 1st, 2020 and the duration of the project is 36 months.

### **5. Your rights**

Under the General Data Protection Regulation (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), you have rights as an individual which you can exercise in relation to the information we hold about you:

- right to request from us access to and rectification of your personal data;

- right to request erasure of your data (right to be forgotten) in the cases foreseen by article 17 of the GDPR ;
- right to obtain from us restriction of processing where there is contestation about the data processing for a period enabling to solve the issue;
- right to data portability;
- where the processing of your personal data is based on your consent, you have the right to withdraw your consent at any time. Withdrawing your consent means that we will not make use of your data any longer, including pictures. However, use made of your data in the past remains valid;
- your right to object;
- you have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data which is based on Article 6(1), (f) of the GDPR (our legitimate purposes) as mentioned above.

To exercise those rights, please send an email with a proof of your identity or write directly through regular mail to the project coordinator or to the dissemination manager (details are available on the project website - <https://www.packall.eu/contacts>)

This Privacy Notice was last updated on March 16th, 2020.