

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.

Cookie Rules of www.packall.eu

1. What cookies are and how they are used

Cookies are text strings sent by a web server (e.g. the site) to the user's Internet browser, which are automatically stored on the user's computer and automatically sent back to the server each time the website is accessed. By default, almost all web browsers are set to automatically accept cookies. The websites use the following categories of cookies, also in combination with each other:

- "session" cookies which are stored on the user's computer for technical-functional needs, for the transmission of session identifiers necessary to allow the safe and efficient exploration of the site; they are deleted at the end of the "session" (hence the name) when the browser is closed. This type of cookie avoids the use of other computer techniques potentially prejudicial to the confidentiality of users' browsing;
- "persistent" cookies that remain stored on the hard disk of the computer until they expire or are deleted by users/visitors. By means of persistent cookies, visitors accessing the site (or any other users using the same computer) are automatically recognized on each visit. Persistent cookies provide many features in the interest of surfers (such as the use of the browser language or the registration of the shopping cart when shopping online. However, persistent cookies can also be used for promotional purposes or even for dubious purposes. Visitors can set their computer browser in such a way that it accepts/rejects all cookies or displays a warning whenever a cookie is offered, in order to be able to assess whether or not to accept it. The user is enabled, however, to change the default configuration (by default) and disable cookies (i.e. permanently block them), setting the highest level of protection.

These two types of cookies (session and persistent) may in turn be:

- "first part" when they are managed directly by the owner and/or responsible of the website
- "third party" when cookies are set and managed by managers outside the website visited by the user.

2. How they work and how delete cookies

The operating modes, as well as options to limit or block cookies, can be made by changing the settings of your Internet browser. To delete cookies from your smartphone/tablet's Internet browser, please refer to your device's user manual.

3. Cookies' list on websites

Cookies are divided into the following macro-categories:

- Analytics: They are cookies used to collect and analyze statistical information about visit/access to the website. In some cases, associated with other information such as credentials entered for access to restricted areas (your e-mail address and password), they may be used to profile the user (personal habits, sites visited, content downloaded, types of interactions made, etc.). For instance, Google Inc., in order to obtain aggregate statistical information useful for evaluating the use of the website and the activities carried out by the visitor, stores the information

collected by the cookie on servers that may be located in the United States or in other countries. Google reserves the right to transfer the information collected by its cookie to third parties, where the law required or where the third party processes information on its behalf. Google ensures that it does not associate your IP address with any other data held in order to obtain a more detailed user profile. Further information on privacy and its use can be found directly on the websites of the respective operators.

- **Widgets:** This category includes the graphical components of a program's user interface, in order to facilitate the user's interaction with the program itself. For instance, Facebook, google+ and twitter cookies are widgets. Further information on privacy and their use can be found directly on the websites of the respective operators.
- **Advertising:** This category includes cookies used to advertise on a site. Google, Tradedoubler fall into this category.
- **Web beacons:** This category includes code fragments that allow a website to transfer or collect information by requesting a graphic image. Websites may use them for various purposes, such as website usage analysis, advertising control and reporting activities, and customization of advertising and content.

4. Use of Flash cookies

The website may use Adobe Flash Player to offer some multimedia content. On most computers, the program is installed by default. If you use some of this content, Google Analytics stores additional data on your computer, known as Flash cookies (or Local Share Object), through which the owner is able to know the total number of times a certain audio/video file is opened, the number of people who use it until the end and how many people close it before the end.

5. List of Collected Cookies

The following table shows the list that we collect and the information.

GOOGLE

Name	Deadline	Description
_ga	2 years	Used to identify users
_gid	24 hours	Used to identify users
_gat_gtag_UA_158807944_1	1 minute	Used to limit the frequency of requests.

WORDPRESS

Name	Deadline	Description
wp-settings-time-{user}	Session	Set up time of wp-settings-{user}

Name	Deadline	Description
wp-settings-{user}	Session	This Cookie is used by WordPress in order to customise the display of the administration interface and, if necessary, the main website interface. Cookie path :/

COOKIES ACCEPTED

Name	Deadline	Description
cookieLawInfo-checkbox-necessary		Track the cookies type accepted.
cookieLawInfo-checkbox-non-necessary		Track the cookies type accepted.