

## PRIVACY POLICY

PackAlliance is an Erasmus+ Knowledge Alliance of academic and industry entities from four EU countries, organized in a consortium composed by:

- Campus Iberus (ES)
- Ecoembes (ES)
- AGH University of Science and Technology (PL)
- Synthos Group (PL)
- Tampere University of Applied Sciences (FI)
- Pyroll (FI)
- Università di Salerno (IT)
- Proplast (IT).

The main objectives of the consortium are:

To equip Higher Education students and packing professionals with industry-demand skills required for circular economy transformation within the plastic packaging sector

To modernize and align Higher Education Institutions curricula with the plastic packaging industry needs

To establish innovative collaboration schemes between Higher Education Institutions and industry based on the knowledge, talent transfer and entrepreneurship in sustainable plastic packaging area

### A. Purpose and legal basis of the processing of personal data

In accordance with the provisions of Regulation (EU) 2016/679, of 27 April (General Data Protection Regulation - GDPR), the personal data we request is that necessary to carry out the objectives and activities of the project and will be shared within the Pack Alliance project partners.

Processing shall be carried out under the legal bases provided for in Article 6.1 of the GDPR. You have the right to withdraw your consent at any time (see Your Rights hereunder).

### 1. 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.

Cookies Policy is available on our website: [www.packall.eu/cookie.asp](http://www.packall.eu/cookie.asp)

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

### 2. When you subscribe to our newsletter:

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

Your contact data will be part of our database of stakeholders and we will use it to deliver our newsletter.

You may unsubscribe from our newsletters at any time.

### 3. When you:

- complete a form we issue, whether on or off-line (for example, a survey questionnaire)
- register and/or attend one of our events / forums on or off-line
- sign up to take part in any piloting of the training programme modules

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

Your contact data will be part of our database of stakeholders and we may use it:

- to help collate the results of a survey
- for further contact by email
- to inform you of the progress/completion of the project
- to invite you to events / forums
- to gather feedback from you
- to invite you to participate in a pilot of the training programme

#### 4. 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).

#### 5. 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).

6. We can also collect data that you otherwise made public in order to contact you when we think it is relevant for you 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).

### **B. Type of data collected**

To pursue the purposes indicated in paragraph A, the following personal data will be collected:

- name of the subject
- surname of the subject
- e-mail address
- Institution/Company name
- Position Company

### **C. Controllers of personal data processing**

Controllers of the personal data processing are:

- **Campus Iberus (Project Leader partner)**

Address: Calle Pedro Cerbuna, 12. Edificio Residencia de Profesores, 5º derecha. 50009 Zaragoza, Spain

Contact point: Belén Gracia ([mbgracia@campusiberus.es](mailto:mbgracia@campusiberus.es))

Data officer: [dpd@campusiberus.es](mailto:dpd@campusiberus.es)

- **Ecoembes**

Address: Cardenal Marcelo Spinola 14, Planta 2, 28016, Madrid, Spain

Contact point: Daniel Menchaca ([d.menchaca@ecoembes.es](mailto:d.menchaca@ecoembes.es))

- **AGH University of Science and Technology**

Address: Av. Adama Mickiewicza 30, 30-059, Krakow, Poland

Contact point: Joanna Kulczycka ([kulczycka@min-pan.krakow.pl](mailto:kulczycka@min-pan.krakow.pl))

- **Synthos Group**

Address: Chemików 1, 32-600, Oswiecim, Poland

Contact point: Arkadiusz Haras ([Arkadiusz.Haras@synthosgroup.com](mailto:Arkadiusz.Haras@synthosgroup.com))

- **Tampere University of Applied Sciences**

Address: Kuntokatu 3, FI-33520, Tampere, Finland

Contact point: Marita Hiipakka ([marita.hiipakka@tuni.fi](mailto:marita.hiipakka@tuni.fi))

- **Pyroll**

Address: Malminsuontie 6, 47220, Siltakylä, Finland

Contact point: Reijo Kauppi ([reijo.kauppi@pyroll.com](mailto:reijo.kauppi@pyroll.com))

- **Università di Salerno**

Address: Via Giovanni Paolo II, 132, 84084, Fisciano, Italy

Contact point: Loredana Incarnato ([lincarnato@unisa.it](mailto:lincarnato@unisa.it))

- **Proplast**

Address: via Roberto Di Ferro 86, 15121, Alessandria, Italy

Contact point: Susana Remotti ([susana.remotti@proplast.it](mailto:susana.remotti@proplast.it))

The data subject may exercise his or her rights under REGULATION (EU) 2016/679 in respect of and against each of the controllers.

#### **D. Obligation or optional nature of consent for the pursuit of the purposes of the processing of personal data**

The provision of data by the data subject is optional but necessary to pursue the purposes of the processing. The refusal to provide the information will not allow, the data subject, to participate in the project activities.

#### **E. Communication and dissemination of personal data for the pursuit of the purposes of the processing**

The data will be communicated exclusively to the controllers indicated in paragraph C and only in the cases provided by law to the EACEA for audit purposes.

The personal data will be processed only in the EU.

#### **F. Storage periods**

We will retain those data as long as they are relevant for our activities and to comply with our project contractual terms concerning audit obligations.

The audit obligations end 5 years after the end of the project with an expected completion date of 31 December 2022.

The data will be stored in a database processed by Proplast and will be automatically deleted at the end of retention time.

#### **G. Rights of the data subject**

The data subjects may exercise their rights to access, rectification, erasure, restriction of processing, objection to processing or portability of their personal data by addressing the contact point at: [packalliance.info@campusiberus.es](mailto:packalliance.info@campusiberus.es) or any of the controllers' contact points listed under section C of this document.

#### **H. Contacts**

Each project partner respects the provisions of REGULATION (EU) 2016/679.

For any doubts, questions and requests regarding the processing of personal data please refer to the following email address managed by the project leader partner:

**[packalliance.info@campusiberus.es](mailto:packalliance.info@campusiberus.es)**

## I. Changes to the Policy

We may update this privacy policy to reflect changes to our information practices. We encourage you to periodically review this page for the latest information on our privacy practices.

This Privacy Notice was last updated on 17/12/2020.

## Cookie Rules of [www.packall.eu](http://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
cookieawinfo-checkbox-necessary		Track the cookies type accepted.
cookieawinfo-checkbox-non-necessary		Track the cookies type accepted.