

DATA PROTECTION NOTIFICATION**CITISYSTEM - Supporting cities in sustainable biobased systemic change****EU's General Data Protection Regulation (2016/679),****Articles 13 and 14****Date: 1.4.2023****Updated: 13.12.2023****1. Data controller**

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2. Data controller's representative and contacts

Data controller's representative:
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Data controller's contact:
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3. Data protection officer

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4. Purpose of data processing

The purpose of the CITISYSTEM project is to support cities in promoting the biobased circular economy. The focus is on increasing specific city-level actions and involving the community in understanding the importance of regional nutrient and energy flows. Achieving this goal

requires a focus on system-level community/stakeholder-level changes. The project will run from March 2023 to May 2027.

We collect data with the sole purpose of sharing information about the project and its results. The data primarily includes information about participants of project events and individuals subscribed to the project newsletter.

The collected data is exclusively used for the CITISYSTEM project purposes. We will use your email address only for delivering the CITISYSTEM newsletter issued twice a year from 2023-2027. Additionally, in the case of your attendance at any of the project events, your email address will also be used for sharing project materials and information related to the event.

5. Legal basis of data processing

The data subject's consent and the performance of a contract.

Under the General Data Protection Regulation (GDPR), we are required to provide you with information regarding the legal basis for processing your personal data. The legal basis for processing your data in the context of the CITISYSTEM project is as follows:

By subscribing to the CITISYSTEM newsletter or participating in any of the project events, you provide explicit consent for the processing of your personal data for the stated purposes outlined in this Privacy Notice.

Our commitment is to ensure that the processing of your personal data is conducted lawfully, transparently, and in adherence to the principles outlined in the GDPR.

6. Content of data filing system and storage period

The storage periods are documented in the filing plan, which includes the organisation's operations and the documents generated in connection with them, including storage periods, which is during the project time (1.3.2023 – 31.5.2027).

Some of the data needs to be stored longer in case of funder's audit (5 years). According to Article 82 of the Common Provision Regulation (EU) 2021/1060, each partner institution is required to archive documents related to their project activities for at least a 5-year retention period from 31 December of the year in which the last payment by the managing authority to the project is made.

In case of the newsletter subscription, we use the MailChimp platform via <https://www.interregeurope.eu/citisystem-webpage> (a public-access). We are gathering the following data on you: your e-mail address. The email address will be stored securely in compliance with the General Data Protection Regulation (GDPR) by LAB University of Applied Sciences (the lead partner of the CITISYSTEM project) until the project is officially closed in 2027.

In case of registration to the CITISYSTEM events, we use the Webropol or Lyyti survey systems. we collect the following data on you: name, surname, email address, institution you represent, dietary restrictions. We also collect your signatures that we need to provide for reporting purposes to the funder. In case of interregional events, we may ask information about your planned arrival and departure, as well as the hotel you intend to stay. This is purely for organizing purposes by the event hosts.

During the online and in person events, we take pictures to be used in social media, project website and publications. We will ask your consent at the beginning of every event.

University's file storage is used for project's data handling and storing. For the contracts and agreements, university archive system, the Dynasty, is used.

7. Information systems employed

For the newsletter subscription, we use the MailChimp platform, subscription is possible via <https://www.interregeurope.eu/citisystem-webpage> (a public-access).

For event registration, we use the Webropol or Lyyti survey systems.

University's file storage is used for project's data handling and storing. For the contracts and agreements, university archive system, the Dynasty, is used.

8. Data sources

Data is mainly collected from the data subjects themselves: Person who signs up for the project events, including the invited stakeholders, and a person who signs up for the project newsletter.

9. Use of cookies

Browser-based data filing systems employ cookies to process personal data. A cookie is a small text file that the browser saves on the user's device. Cookies are used to implement services, facilitate login, and enable the compilation of statistics on services. Users may prevent the use of cookies in their browser programmes, but this may prevent the system from operating correctly.

Cookies are used in data processing in browser-based systems.

10. Data transfer and disclosure

Data is not transferred.

11. Data transfer and disclosure beyond the EU or EEA

In case of Mailchimp, personal data will be transferred outside the EU or EEA fulfilling reliable mechanisms for personal data transfers (Data Privacy Framework (DPF) program).

Otherwise, personal data will not be transferred outside the EU or EEA.

12. Safeguards for data processing

The collected and printed data is stored and safeguarded from external access in a locked cabinet, and only the project staff have access to it. Printed documents are safely discarded when not anymore necessary. In addition, the data is processed on the university's secure servers and may only be accessed by the employees of the Technology department.

Regarding the newsletter subscription, only the lead partner has access to the newsletter subscriber list in MailChimp.

Organizers of the project events have access to Webropol/Lyyti for participants registration.

13. Automated decision-making

No automated decision-making.

14. Rights of the data subject

Data subjects have the right to withdraw their consent if the data processing is based on consent.

Data subjects have the right to lodge a complaint with the Data Protection Ombudsman if the subjects consider that the data processing regarding them is in breach of data processing legislation in force.

Data subjects have the following rights under the EU's General Data Protection Regulation:

- a) Right of access to data concerning the data subject (article 15)
- b) Right to rectification of data (article 16)
- c) Right to erasure of data (article 17). The right to erasure shall not apply if the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes if the right to erasure prevents or significantly hinders the data processing
- d) Right to restriction of processing (article 18)
- e) Right to data portability to another data controller (article 20).
- f) Right to object (article 21).

Data subject's rights under the EU's General Data Protection Regulation do not automatically apply to all data processing.

The liaison in matters related to the data subject's rights is the data protection officer; contact details in section 3.