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GÉANT Privacy Notice

GÉANT Privacy Policy V1.0

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Table of Contents

Introduction	3
Legal Basis for collecting your data.....	3
Use of GÉANT websites.....	4
How we collect and use (process) your personal information on Websites and for Services	4
What we do with it:	5
Retention Periods	6
How we use collect and use (process) your personal information for training and other Events	6
How we use collect and use your personal information for training and other events (to be referred to hereafter as “Events”):	6
What we do with it:	7
What we do NOT do with this data:	7
Record Retention	7
Events held with third parties:.....	8
Cookies.....	8
Consent	8
Google Analytics.....	9
When and how we share information with others.....	9
Transferring personal data from the EU	9
Data Subject Rights	10
Automated Processing	11
Security of your Personal data.....	11
Changes and updates to the Privacy Notice	11
Review of this Policy	12
Questions, concerns and complaints	13

Introduction

This Privacy Policy is relevant for anyone visiting our websites, using our services, application, attending one of our organised events or otherwise interacting with GÉANT Association.

This Privacy Policy concerns the processing of your personal data for which we are the data controller – in other words, where we decide the purposes for which your personal data is collected, how it is stored, shared and retained for.

When GÉANT directly collects data from you as a “data controller” we will ensure that only the minimum amount of data necessary to carry out the service or provide the product, event or training session(s) you have registered to use will be processed.

GÉANT may be acting as a data processor operating a service provided to you by someone else such as a University or research establishment. For information about these services – you should contact the appropriate Data Controller directly for their Privacy Policy.

We do not knowingly attempt to solicit or receive information from children. If you are a school and provide a service to children under the age of consent, you are responsible for obtaining consent from the parents/legal guardians of each child you wish to allow to use any of our services.

If you are unwilling or unable to provide us with the necessary personal information required to provide you with the services we are engaged in then we will try to provide the service but it may prove impossible.

BY ACCESSING OR USING OUR SERVICES OR WEBSITES, YOU AGREE TO THIS PRIVACY NOTICE.

Legal Basis for collecting your data

You have either entered into a direct contract with us for us to provide you with a service/product or registered with us to attend a training/event run or sponsored by us or your NREN/Institute has entered into an agreement for us to provide you with this service/product. In order for us to provide this service we will be relying on our contractual obligations and/or legitimate interest to collect and process the necessary personal data to provide the service/product requested.

Use of GÉANT websites

Like most websites we collect certain information automatically and store it in log files. We use this information to help us design our site to better understand your needs and requirements. Our website also uses cookies and web beacons.

When you contact us for customer support or with a query regarding the services we provide we may collect additional information to resolve your issue.

How we collect and use (process) your personal information on Websites and for Services

With a few exceptions, this information is limited to the kind of work information that is required to be shared as part of any person doing business or using a web based application or service and may include depending on the service or product you use:

- Name
- Email address
- Log records;
- Access to shared community communication networks such as Slack, Lifesize, Skype.
- The data is used for generation of usage statistics that are publicly available at <https://monitor.eduroam.org> and for reporting to EC and other stakeholders.
- IP address;
- SSH public key(s);
- Technical log data;
- Identifiers such as ORCID;
- Device information;
- The region or general location where your computer or device is accessing the internet;
- Unique device identifiers;
- Application ID;
- Operational contact information for individual administrators IdPs, SPs, AAs and Identity Federations is collected in the metadata published by Identity Federation and
- Location information, what university or institution you are logging on from
- Identifiers

What we do with it:

We use this information held about you to provide you with the services you wish to use including:

- To present content from the services you requested in an effective manner to you.
- To carry out contractual obligations arising from any contracts entered between you and us or your service provider.
- To register you for events and other services you have requested.
- To assist us in maintaining records of events for internal and external security and audit purposes.
- To respond to any concerns or queries you have in relation to our services or websites
- We may also use your IP address to help diagnose problems with our servers and to administer our websites, analyse trends, track visitor movements and gather broad demographic information that assists us in identifying visitor preferences;
- Displaying the Services. When an authorised user provides information, it may be displayed to other authorised users in the same or connected workspace.
- Collaborating with others. Some services provide different ways authorised users can collaborate, such as shared communication channels and services
- To provide you with information, products or services that you request from us or which we think may be of interest to you.
- We may collect certain information that does not directly identify and individual. Such information tells us about the equipment your using, browsing actions, the resources accessed and the operating systems used. We use analytics and similar services, as explained in our Cookie Policy to help us deliver a better service to you.
- To contact you about our services or related services.
- To ensure that the data you provide remains safe and secure by using appropriate monitoring and auditing mechanisms.
- For certain services, we collect personal information under the direction of our clients (e.g. an entity like a University that subscribes to the Services for use by the entity's personnel).
- We may engage with Third Party Services when enabled by you we may share data with them to enable their services to operate effectively. It is your responsibility to check the privacy setting and notices in these Third Party Services.
- We may engage Third Party Service Providers to process information and provide storage services. GÉANT will ensure appropriate security controls are in place with any Third Party Provider.
- We may use Aggregated or De-identified Data for other purposes such as identified users from specific countries or average time using services.

Retention Periods

Your personal data is stored for the duration of your use of the services provided and an additional **12** months after you cease using our services. We keep this data in order to deal with any queries that may arise following your use of our services.

In certain circumstances data may be retained longer for archiving in the public interest, scientific or historic research purposes.

How we use collect and use (process) your personal information for training and other Events

“Events” – refers to any event, seminar, training, webinar, info share, networking event, drinks party or social gathering organised by GÉANT

How we use collect and use your personal information for training and other events (to be referred to hereafter as “Events”):

Depending on the nature of the event we will receive the following information from you or someone within your organisation

- Attendees/your name
- Organisation
- Job title
- Email address
- Contact information (where provided)
- Payment confirmation
- Food preferences
- Any special requirements
- Specific accessibility requirements

What we do with it:

- Send feedback forms to you to help us monitor and improve the services we offer
- Share feedback, generic photographs and videos through relevant external and internal social media portals such as LinkedIn Facebook, Twitter, Slack, Lifesize, Skype
- Log data to provide statistical information about service usage;
- Send anonymised data to the venue, including number of attendees, dietary requirements and accessibility requirements
- Email you with further events of a similar nature which might be of interest to you. You have the option to opt out at any time from these emails by clicking the “unsubscribe” button at the bottom of the email. This will remove you from our emailing list and you will not receive any further communications from us in relation to new events being organised by us.

What we do NOT do with this data:

- Pass onto third parties without your consent.

It is standard practice within the Community to take photographs and videos of events and training sessions. By attending these events you agree that GÉANT may use, reproduce and/or publish in any way whatsoever (without payment being due to you) any photographs and/or videos/audio that may pertain to you (including your image, likeness and/or voice), and that it may license others to do the same. If we wish to use a specific photo or video of you in our promotional materials, explicit consent will be requested.

This material may be used (without limitation) in various publications, public affair releases, recruitment material, broadcast material, internal publications and social media platforms, the GÉANT website(s) or for other related endeavours. This authorisation is continuous and may only be withdrawn with the prior written agreement of GÉANT Association.

If we wish to quote you, we will ask for your specific permission first.

Record Retention

- Your personal information name/contact details/Workplace is stored for the duration of your use of the services provided and an additional **12** months after you

cease using our services. We keep this data in order to deal with any queries that may arise following your use of our services.

- Photographs of the event will be stored and archived
- The attendee lists will be kept no longer than 4 years
- The feedback forms will be retained no longer 4 years

In certain circumstances data may be retained longer for archiving in the public interest, scientific or historic research purposes

Events held with third parties:

If the event is being jointly run/sponsored with a third party, this will be clearly promoted. If personal data is to be shared with a joint third party, sponsors, exhibitors, speakers or the organisation they represent it will be clearly notified on the literature or invitation. To understand how a third party will use your data, we will link to their Privacy Policy or notify you how to obtain a copy.

Cookies

What are Cookies? A cookie is a small text file that is stored on the web browser on your computer when you visit a website. Cookies do lots of different jobs, like letting you navigate between web pages efficiently, remembering your preferences, and generally improving the user experience.

By using our websites you agree that we can place these types of cookies on your device, however you can block these cookies using your browser settings (there are instructions below on how to do this)

Consent

We recommend that you accept and use cookies. A full Cookie Policy can be seen by clicking the link below which will provide further details on:

- How we use cookies
- How to enable/disable cookies
- How to change cookie settings
- The cookies used on the websites
- Third party cookies

<https://www.GEANT.org/Policies>

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Google Analytics

We use Google Analytics track the numbers of visitors to our site but do not collect any personal information or store IP address locally on our site. This is only used to monitor the number of hits on our pages and location at the country level therefore we cannot track or trace individual users or their physical addresses.

If you would like to opt out please use this link

<https://tools.google.com/dlpage/gaoptout>

When and how we share information with others

We will share your personal data with third parties only in ways that are described in the Privacy Notice.

We provide and support some of our services through contractual arrangements with service providers and other third parties. We and our service partners' use your personal data to operate our website(s) and provide Services and events to you.

The personal information GÉANT collects from you is stored in one or more databases hosted by third parties located within the EU. These third parties do not use or have authority to access to your personal data for any reason other than cloud storage and retrieval.

We will also disclose personal data in the following circumstances:

- If we are required or permitted to do so by law, regulatory or other legal process.
- To protect our rights, reputation, property or the safety of us and others.
- To defend or enforce our rights or your obligations.

We do not sell personal information to anyone or share it with third parties who are facilitating the delivery of other services.

Transferring personal data from the EU

GÉANT is headquartered in the Netherlands (NL), with another office based in Cambridge, England (UK). Information we collect about you will generally be processed in these locations. GÉANT endeavours to apply suitable safeguards to protect the privacy and

security of your personal data and to use it only within the authorisation you have given and the practises described in this Privacy Notice.

In some cases we may transfer your personal data to countries outside the European Economic Area (EEA), for example if we use a third party for processing services or storing data or for obtaining feedback on one of the services or events we provide. If we do transfer personal data to third countries, we will ensure that such transfers are compliant with our obligations under relevant data protection legislation and that appropriate technical and operational controls are in place to keep your personal data secure.

If personal data is transferred from the EU to the USA, the EU-US Privacy Shield will be used. This framework was developed to enable companies to comply with data protection requirements when transferring personal data from the EU to the USA.

GÉANT also minimizes the risk to your rights and freedoms by not collecting or storing any sensitive information about you without your explicit consent.

Data Subject Rights

You have the right to ensure:

- We process your data fairly and lawfully within the consent (if applicable) you have provided us;
- Your data is accurate, to rectify data released by your home organisation, (e.g. your university or research institute), contact your home organisation direct.
- The data we collect is not excessive but only the data we require to provide the services or products you requested;
- Your data is secure by ensuring we have appropriate technical and operational controls in place to secure your data;
- That your personal data is securely destroyed when no longer required.

You can:

- Have your data updated and amended if it is incorrect, out of date or incomplete.
- Restrict the level of processing or automated processing
- Know how long we keep your data
- Ask us to erase your data at any point and be forgotten (subject to certain exceptions).
- Ask us to provide details of your personal data we hold, by making a request to us in writing.

- You have choices in respect of cookies, as described in our Cookie Policy. By modifying your browser preferences, you may be able to choose to accept all cookies, to be notified when a cookies set, or to reject all cookies. If you choose to reject all cookies some parts of our websites/services may not properly in your case.

Automated Processing

If some of our services use automated processing to detect and respond to problems more efficiently and you feel any decision made by any automated process has affected you in a way that is not acceptable, you can contact the data protection office at to ask us to review the results manually.

Security of your Personal data

GÉANT takes the confidentiality, integrity and availability of your personal data very seriously. We take appropriate security precautions to protect your personal data from loss, misuse and unauthorised access, disclosure, alteration and destruction. When accessing a service provided we will have adequate security control in place to keep your personal data safe in accordance with the classification of the personal data we have collected from you.

Although we endeavour to ensure your personal data remains secure, there is no absolute guarantee of security when using services online. While we strive to protect your personal data, you acknowledge that:

- There are security and privacy limitations on the internet which are beyond our control.
- The confidentiality, integrity and availability of any and all information exchanged using these services cannot be 100% guaranteed.
- We cannot be held accountable for activity that results from your own neglect to safeguard the security of your log on credentials and equipment which results in a loss of your personal data.

If you feel this not sufficient then please do not provide any personal information.

Changes and updates to the Privacy Notice

Services and products offered to you may change from time to time and this Privacy Notice will be updated appropriately. We reserve the right to amend the Privacy Notice at any



time, for any reason, without notice to you, other than the posting of the amended Privacy Notice at this site. We may e-mail periodic reminders of our notices and terms are currently in effect and any changes that may have been made to it.

[Review of this Policy](#)

We keep this Policy under regular review. This Policy was last updated in March 2018.

Questions, concerns and complaints

GÉANT Association Head Office is based in the Netherlands and has appointed an internal Data Protection Officer for you to contact if you have any questions, complaints or concerns about its personal data policies or practices or how your personal data is being handled, the Data Protection Officer, contact details are as follows:

Data Protection Officer
GÉANT Association
Hoekenrode 3
1102 BR
Amsterdam – Zuidoost
Netherlands
Tel number: +31 20 530 4488

Email: GDPR@geant.org If you wish to raise the complaint direct with the relevant Supervisory authority their details are listed below:

Netherlands

Dutch Data Protection Authority
Autoriteit Persoonsgegevens
Postbus 93374 2509 AJ DEN HAAG.
Telephone number: (+31) - (0)70 - 888 85 00.

United Kingdom

Information Commissioners Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

<https://ico.org.uk/global/contact-us/>

GÉANT registration number is ZA187860