

DRAFT - derived from version WLCG v0.8 - 10 June 2019

## [NAME] Privacy Notice

*[Identify the organisation presenting the Privacy Notice and describe, at a high level, its purpose in relation to the service being provided. Example: The Worldwide LHC Computing Grid (WLCG) is a global computing infrastructure whose mission is to provide computing resources to store, distribute and analyse the data generated by the Large Hadron Collider (LHC), making the data equally available to all partners, regardless of their physical location.]*

### General Principles

[NAME] will only gather and process such personal data as is required for the proper functioning of [name or description of the service being requested].

**[Optional:** [Name of service being requested] is part of [infrastructure name] and, as such, is bound to a common policy framework for Data Protection and Privacy which is available at <LINK>.]

The personal data detailed below is collected for the purposes of identification, authentication, authorisation, access control, accounting, billing, resource management and information security. The legal basis for processing this data is for the purposes of the legitimate interests pursued by [NAME].

### What personal data is collected from you and why?

#### 1. Registration

When you register to use [name of service being requested], the following data is collected and associated with your account:

- *[List personal data collected. Examples:*
- *Given name and family name*
- *Professional email address*
- *Employing institute*
- *Experiment affiliation and validity dates*
- *[VO or Community] groups and roles*
- *Professional address and telephone number*
- *A non-reassigned, unique personal identifier - for example, the Subject Distinguished Name (DN) from your personal certificate*
- *..]*

This data is necessary for security and accounting purposes to uniquely and properly identify and authenticate you when creating an account for subsequently accessing [NAME] services.

## 2. Access

When you access [NAME] services, log records of your access to and actions on [NAME] resources are created. These records may contain:

- *[List personal data processed. Examples:*
- *your unique identifier (as described in 1 above)*
- *your [VO or Community] group(s) and role(s)*
- *the network (IP) address from which you access [NAME] services*
- *the time and date of access*
- *details of actions you perform*
- *..]*

In combination with the registration data above, these log records are necessary to ensure that [NAME] services are both reliable and secure and for resource management purposes. This includes authentication, authorisation, accounting, security incident handling, assisting in the analysis of reported problems and for contacting you if a problem is identified with your account.

## Retention Period of your Personal Data

We keep your user registration data for as long as you remain a registered member of [NAME] and then for up to [36 months/duration] after you leave or your membership is otherwise terminated.

Access logs and accounting records are kept for up to [18 months/duration] before being anonymised or deleted.

## How your personal data is protected

Your personal data is protected against unauthorised disclosure, modification or deletion, by technical and organisational measures, including during transfer as described below, as required by the policy framework for Data Protection and Privacy.

## Who has access to your personal data?

Your personal data will only be accessible to those authorised by [NAME], and only for the purposes described above.

## Do we transfer your personal data to others?

Your personal data may only be transferred as far as is necessary to provide the [NAME] and supporting services to:

- authorised [\[NAME\]](#) participants,
- third parties whose data privacy and protection policies are equal to or more restrictive than the [\[NAME\]](#) policy; such transfers are detailed in the privacy notice of the service you are accessing,

Other transfers are not allowed except where legally required.

## What rights do you have related to our processing of your personal data?

You have the right to:

- access the personal data we hold about you, to
- rectify them if inaccurate, to
- object to its processing and, if applicable, to
- request that we delete them.

Changes to or removal of personal data may limit your access to [\[NAME\]](#) services.

Where appropriate, in the first instance, use the contact details provided by the service in question. If it does not resolve your concern and for other cases please use the contact details given below.

## Who to contact if you have a query about this privacy notice?

Please use the email address [\[Contact email address\]](#)

## How to complain to a supervisory authority.

You have the right to lodge a complaint with a supervisory authority in relation to our processing of your personal data. For example, an applicable authority for where you live, your place of work or the location of the service you are accessing, from the EU Data Protection Board web page ([https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en)).