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|  | EUROPEAN COMMISSION |

**PROTECTION OF YOUR PERSONAL DATA**

**This privacy statement provides information about   
the processing and the protection of your personal data.**

**Processing operation:** HEInnovate Website

**Data Controller:**European Commission,Directorate-General for Education, Youth, Sport and Culture, Innovation and EIT (EAC.C.1)

**Record reference:** *DPR-EC-01867*

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11. **Introduction**

HEInnovate is an initiative of the European Commission's DG Education, Youth, Sport and Culture in partnership with the OECD Local Economic and Employment Development Programme (LEED). We have created this privacy statement ("**Privacy Statement**") to inform you of how we collect, use, share, and secure your personal information. This Privacy Statement is incorporated into, and is part of, the HEInnovate Terms and Conditions, which governs your use of the HEInnovate website (**“Website”**) in general.

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation (EU) 2018/1725](https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=uriserv:OJ.L_.2018.295.01.0039.01.ENG&toc=OJ:L:2018:295:TOC) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way data are being collected, handled and protection of all personal data provided ensured, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

This privacy statement only covers HEInnovate. It does not cover sites that either link to or from this site.

1. **Why and how do we process your personal data?**

Purpose of the processing operation HEInnovate i.e. the Commission’s processors (the contractors i.e. the website developer and administrator team by virtue of website administration) collect and use your personal information to:

* Provide you with tailored features and functionality of the Website
* Identify you as the sender of, and to process, your e-mails
* Respond to your questions and comments
* Send you tailored messages you requested helping you use the Website
* Improve, enhance, and tailor the Website for you
* Carry out specific actions you request
* Provide information you requested on different topics on important developments, activities, events, webinars, initiatives or thematic issues in the area of the services of HEInnovate in particular through news items and newsletters or notifications
* Collect information for statistical purposes in an aggregated and anonymised manner

Your personal data will not be used for an automated decision-making including profiling.

1. **On what legal ground(s) do we process your personal data**

We process your personal data, because you have given consent to the processing of your personal data during the registration process to HEInnovate.

You have subscribed to receive tailored messages helping you use the Website.

You have subscribed to receive the information on important developments, activities, events, initiatives or thematic issues in the area of the services of HEInnovate in the form of newsletters and/or news items and notifications.

1. **Which personal data do we collect and further process***?*

In order to carry out this processing operation the Commission’s contractor collects the following categories of personal data:

Information you provide to us:

* When you use the Website, including when you create a user account, start or submit a self-assessment, or when you ask a question through the Website, you may provide us with information that identifies you or your contacts (“personal information”), such as:
  + Your full name, address, e-mail address, other information that may identify you as an individual e.g. country, name of higher education institution (or organisation), your role, name of faculty/department and area of discipline
  + Any personal information you submit to us in any message boards and contact forms
* The following data are needed to ensure the delivery of the service to you as a subscriber to our newsletters: your e-mail address, first name, last name
* The following data are needed to ensure the delivery of the service to you as a subscriber to our news items: registered profile on HEInnovate i.e. your e-mail address, first name, last name

Information we collect from you automatically:

* When you use the Website, we may also collect information about your use of the Website and the device used to access the Website that relates to you, but on its own this information collected does not identify you (“non-personal information”). Such information includes your:
  + IP address and country location
  + Browser information (including browser type, capabilities, and language)
  + Operating system
  + Date and time you accessed the Website
  + Website usage information, including the paths taken as you move from one website or webpage to another website or webpage (i.e., your "click stream" activity)

The provision of personal data is mandatory to meet theregistration requirements on the Website*.* If you do not wish to provide your personal data, you can use the Website through the guest user function that allows access to the content of the Website and the self-assessment completion without registration. Please note that your self-assessment completion will be automatically deleted from the system after 90 days if completed through the guest user function.

1. **How long do we keep your personal data?**

The European Commission only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing namely for seven years from the first registration on the Website. This retention limit provides the benefit for users to assess their progress over time while their data is stored during a reasonable period of time, i.e. 7 years.

For those users, who use the Website without registration and complete the self-assessment without login to the Website i.e. guest users, we store the information provided for 90 days. After the 90 days all data is deleted from the system.

For the HEInnovate newsletters and news notifications, the Commission’s processors (the contractor) only keep your personal data for the time necessary to fulfil the purpose of collection, namely until you unsubscribe from the mailing list.

To unsubscribe from the newsletter, you can either write to the dedicated functional mailbox (hei\_team@ppmi.lt) and ask to be unsubscribed from the mailing list or you can also follow the unsubscribe link in the information email you have received. Appropriate action shall be taken within a week of receiving the request.

To stop received news notifications and help with the use of the Website, you can either write to the dedicated functional mailbox (hei\_team@ppmi.lt) or you can edit your preferences in your user profile on the Website at any time.

1. **How do we protect and safeguard your personal data?**

All personal data in electronic format (databases, uploaded data, etc.) are stored on the servers of the contractors of the European Commission hosted in a protected data centre, which is located in a country of the European Union. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission’s contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States (‘GDPR’ Regulation (EU) 2016/679.]

In order to protect your personal data, the Commission’s processors (contractors) have put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

1. **Who has access to your personal data and to whom is it disclosed?**

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the “need to know” principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Access to your personal data is provided to the Commission’s contractor responsible for carrying out this processing operation according to the “need to know” principle. They include the website developer and administrator team, who have access to data by virtue of website administration. The Commission’s contractor abides by statutory, and when required, additional confidentiality agreements.

The Commission’s contractors act as processors and are by contract bound to respect the confidentiality of any information brought to their attention in the performance of the work and that they will not divulge to third parties or use for their own benefit, or that of any third party, any document or information not available publicly, even after completion of the contract with the European Commission.

In addition, the self-assessment results completed as part of a group exercise on HEInnovate are available to the registered user and to the group administrator (i.e. the registered user who set up the group and invited others to complete the self-assessment as part of their group). The registered profile gives access to all self-assessments completed by the user, which can be used for their own internal comparative purposes. The group administrator only has access to the self-assessment results completed as part of that specific group. Self-assessments assigned to a group can be removed and deleted by the user at any time.

The Processor for this processing activity is:

* PPMI Group UAB (part of the Verian Group), Gedimino pr. 50, LT-01110 Vilnius, Lithuania
* Touch4IT s.r.o., Hany Meličkovej 5, 841 05 Bratislava, Slovakia

Third party websites: Please be aware that when you are using the Website, you could be directed via links or other means to third party websites, content, and resources that are not affiliated with the Website. These third-party websites, content, and resources may send their own cookies to visitors, collect data, or solicit and use your personal information in ways different than set forth in this Privacy Statement. The privacy policies of these third-party websites, content, and resources may be very different from this Privacy Statement. We are not responsible for the privacy practices of the providers of these other websites, content, and resources and cannot guarantee the security of any of your personal information collected, used, or shared there.

1. **What are your rights and how can you exercise them?**

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the Data Controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

1. **Contact information**

* **The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller: Unit C1, Directorate-General for Education, Youth, Sport and Culture ([eac-heinnovate@ec.europa.eu](mailto:eac-heinnovate@ec.europa.eu))

* **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

* **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

1. **Where to find more detailed information?**

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO’s public register with the following Record reference: *DPR-EC-01867*