



*Fondazione ICONS privacy notice*

## **Introduction**

Dear Subscriber,

We are glad to share with you the latest news on the developments and results of eNeuron, as well as on future developments of this research area. This Privacy Notice is a document addressing you as Data Subject, i.e. the owner of your personal data. It explains which personal data we collect and how we use it.

This Privacy Statement regulates the processing of personal data by Fondazione ICONS, with registered office in Italy at I-26900 Piazza della Vittoria 1, Lodi, Fiscal Code 92563110151, e-mail [icons@icons.it](mailto:icons@icons.it), Tel. +39 0371 091065, which acts as Data Controller.

Please read this document carefully, it contains essential information about the way your personal data are processed and about the cookies that are used.

Fondazione ICONS' mission is to disseminate the results of scientific research projects to the general public. Fondazione ICONS acts as the

communication, dissemination and exploitation partner in many scientific and cultural research consortia, mostly publicly (EU and National) funded, occasionally privately funded. We help scientists and researchers to share the results of their work with the general public, researchers and innovators.

Within the eNeuron consortium, Fondazione ICONS is the partner responsible for communication and dissemination activities. The personal data and the data treatment described below are managed by Fondazione ICONS staff, who act according to high and proven professionalism in the design of communication strategies and support the other consortium partners in the management of these data where required.

## **1 Type of data and related treatment**

### **1.1 Data voluntarily provided by the Subscriber**

The explicit and voluntary provision of personal data provided by you is essential in order to have access to certain services offered by the Data Controller through the website (e.g. Newsletter Subscription) and to receive the requested update. This involves the collection of personal data and contact details, as well as any other personal data that are required to respond to requests or to provide the available services. Fondazione ICONS doesn't collect nor treat sensitive data. Once the project to which you have subscribed is terminated, your personal data might be treated as per Art.2 in other similar projects where Fondazione ICONS carries out communication activities. They can also be used for generic communication activities in the content areas for which you have expressed your interest.

### **1.2 Navigation Data (Data deriving from User's navigation)**

During routine activities, the computer system may store some of your browsing data. These data, although not collected in order to be associated with your identity, may allow indirect recognition of your

identity when processing and associating with the data held by the Data Controller. For this reason they could be considered “personal data” according to the Privacy Regulation. This category of data (which includes, by way of example but not limited to, IP addresses and domain names of the User’s computer) is collected by the Data Controller for statistical purposes in anonymous form, but by means of some data processing procedures it could be possible to trace the User identity in order to ascertain any liability for crimes committed via the Website or damages against it.

### **1.3 Navigation data processed with Google Analytics or similar applications**

Our website is using Google Analytics, a simple, easy-to-use tool that helps website owners to measure how Users interact with website content. Google Analytics gives us the ability to track the visitor interactions by using first-party cookies that can record information about the time and the page a User has seen, for example the URL of the page, and “remember” what a User has done on previous pages and the “cache memory” of the pages or websites the User has seen or interacted with. Google Analytics tracks and traces the website visitors IP address to identify the visitors based on the geographical location they provided. Google Analytics does not collect any personal information about the website Users as it reports website trends.

Fondazione ICONS shall not use (and shall not allow any third party to use) this Service to record, collect or upload any data that may/can identify an individual (such as for example name, email address, IP address, billing information) or other data that can be reasonably linked to such information by Google. You may decline cookies by deactivating them in your browser but this may prevent you from accessing certain or all features of this website.

## **2 What do we do with your personal data?**

Your data are part of our general database that we utilize to organize dissemination, communication and networking activities related to the projects that we are working on.

We are using your personal data for the following treatments:

- To send newsletters and information on the activities carried out by the eNeuron Consortium by means of traditional and web-based contact methods (e.g. fax, e-mail, text messages etc.);
- To provide information and answers about our activities, research results and content from the projects we work on;
- To carry out statistics and reports in anonymous form (e.g. assessment the download of the material provided, the number of times a website was accessed, the most visited pages, the average visit duration, the country of origin of Users etc.);

We commit to ensure that Subscribers will always be free to opt-out and exercise their rights as regard to the treatments mentioned above. Each communication has an opt-out link where you can inform us about your decisions.

## **3 Where do we store and protect your data?**

The data processing related to the website's services takes place at the Headquarter of Fondazione ICONS located in Lodi (Italy) I-26900 via Volturno 15. The applicable law on the top of the EU GDPR 679/2016 is the Italian Privacy Regulation, considering the effective and actual processing activity and the context in which personal data are processed.

The data processing is performed by authorized members of the Fondazione ICONS staff who have been appointed and trained in maintaining security and confidentiality of personal data.

In addition to the data collection, the processing of your personal data may involve their recording, storage, modification, communication and cancellation. The data processing shall be carried out with the use of electronic equipment. Storage of personal data shall be in electronic form, for the time that is strictly necessary to meet the purposes and in accordance with local regulations and internal processes.

With regards to the personal information you provide, please note that all the necessary steps will be taken to ensure the confidentiality and security of shared data, in compliance with the provisions of the Privacy Regulation. In particular, we have implemented all the technical, organizational, logistical and procedural security measures in line with technological developments pursuant to the Regulation, in order to guarantee the minimum level of data protection required by the legislation in force.

The data are stored in a database that is hosted by a hosting & cloud service provider, which Fondazione ICONS relies on. The hosting and the related responsibilities are ruled by a specific contract. In this contract the above-mentioned Provider claims that the servers used to host and store the database are located in data centres within the European Union.

The services offered are in compliance with the relevant legislation on data protection thanks to the adoption of appropriate security measures.

## 4 Who is processing your data?

Fondazione ICONS is the eNeuron Data Controller. This means that the Fondazione ICONS' management has the accountability and the responsibility to set structure and procedures to treat and protect your data.

Appointed members of the staff are responsible for the actual treatment of your data; concretely they will treat your data as described in the previous section.

Other consortium's members might occasionally operate as Data Processor, in that case, they will comply with the same rules as stated in this privacy notice. As data controller, Fondazione ICONS will ensure similar protection of the rights of the data subject.

## 5 Cookies Policy

Cookies are small text files that are stored on the User's computer's browser directory when visiting certain websites. The website uses cookies for specific and limited purposes, namely to provide easier navigation and for the purposes of internal security, of statistical analysis related to navigation and of system administration. Session cookies allow Users to be recognized within a website so any page changes or item or data selection you do is remembered from page to page. Session cookies are temporarily stored in the computer memory only during a User's browsing session and are automatically deleted from the User's computer when the browser is closed. Persistent cookies remain in the browser's subfolder and are activated again once the User visits the website that created that particular cookie thus facilitating the navigation and making it faster (with the "keep me logged in" option). Analytical cookies collect anonymous data for internal purposes with

the aim of providing a better browsing experience to the User. These data help us to understand how visitors use our website, the number of visits, the most visited pages, the average duration of visits and much more, allowing us to improve the content of our website and the way it is presented. These are third-party cookies, meaning that they are sent and managed by a Third Party whom the Data Controller has engaged to store User preferences and for marketing purposes. No personal information is collected about you or about your computer. All collected data are anonymous and aggregated.

### Third Party Cookies

Cookie	Domain	Description
__utm __utmb __utmc __utmz	eNeuron.eu website	eNeuros uses Google Analytics, which sets a cookie in order to anonymously identify when users return to specific websites. Google uses the information sent with this cookie to store a history of website pages visited in a user's session. This data will not be used to associate any part of your identity, anonymous or not, with any other data held by Google. Further information about how to opt-out of this cookie can be found at <a href="http://www.google.com/intl/en/privacypolicy.html">http://www.google.com/intl/en/privacypolicy.html</a>
Twitter share button cookies	twitter.com	When you create or log in to an account on <a href="http://www.twitter.com">http://www.twitter.com</a> cookies are stored on your computer in order to remain logged-in to your twitter account when visiting <a href="http://www.twitter.com">http://www.twitter.com</a> again. The Twitter Share Button used on eNeuron Website is hosted by <a href="http://www.twitter.com">http://www.twitter.com</a> and your browser therefore sends this cookie data to Twitter when creating the button inside your browser. This data is used by Twitter in order to associate the Twitter Share Button with your Twitter account. This data is not accessible to us, and is not sent to us by Twitter. More information about this cookie and Twitter's Privacy Policy can be found at <a href="https://twitter.com/privacy">https://twitter.com/privacy</a>
LinkedIn share button cookies	linkedin.com	When you create or log in to an account on <a href="http://www.linkedin.com">http://www.linkedin.com</a> cookies are stored on your computer in order to remain logged-in to your LinkedIn account when visiting <a href="http://www.linkedin.com">http://www.linkedin.com</a> again. The LinkedIn Share Button used on eNeuron Website is hosted by <a href="http://www.linkedin.com">http://www.linkedin.com</a> and your browser therefore sends this cookie data to LinkedIn when creating the button inside

<b>Cookie</b>	<b>Domain</b>	<b>Description</b>
		your browser. This data is used by LinkedIn in order to associate the LinkedIn Share Button with your LinkedIn account. This data is not accessible to us, and is not sent to us by LinkedIn. More information about this cookie and LinkedIn's Privacy Policy can be found at <a href="https://www.linkedin.com/legal/privacy-policy">https://www.linkedin.com/legal/privacy-policy</a>

## **6 Why do we process your personal data?**

Fondazione ICONS' processes personal data in order to accomplish its mission to disseminate the results of scientific research projects to the general public.

Within the eNeuron consortium, Fondazione ICONS is the partner responsible for communication and dissemination activities as described in Art. 2.

## **7 Which is the legal ground on which we operate?**

The Data Controller has the Legitimate Interest to treat your personal data as per art. 6 (f) GDPR 179/2016. Our detailed rationale for claiming legitimate interest is based on a Legitimate Interest Assessment (LIA), periodically reviewed.

We believe that it is a mutual benefit to remain in contact; you will receive from us communications exclusively as detailed in the previous paragraphs. We are counting to hear from you back on the specific topics through our communication activity for a mutual growth.



## **8 How long will we retain and process your data?**

Your data will be processed for the whole duration of the project that you subscribed to or of other similar projects that we proposed to you. You will always have the possibility to opt-out from any of the projects if you are not interested in them anymore.

Once a specific project is over, and starting from the last communication that you receive from us, we will keep your data for a further period of 2 years. If in this period of time you don't receive any further updates from us, we will get in contact with you to verify if you are still interested in being part of the community and in case extend the retention period for 2 additional years. If after the 2 additional years, Fondazione ICONS hasn't performed any communication activity related to your area of interest your data will be deleted.

## **9 Data transfer**

Fondazione ICONS processes do not require any transfer of data to external third parties with the sole exception of auditing authorities of the public or private institutions that funded the research projects.

Following the processes and treatments described above, your personal data can be communicated to the Data Controller's staff.

Furthermore, and in so far as necessary, Personal data shall be disclosed, in so far as they are concerned, to eNeuron Consortium, and Consortium Contractors including but not limited to the following categories:

- Organizations that are part of the eNeuron Consortium;

- Persons in charge of managing the website and the related activities;
- Persons who provide services for the management of the information system of the company;
- Persons carrying out monitoring, auditing and certification activities with regard to the business in which organizations are in, even in the customers' interest;

The personal data you provide will not be sold to or shared with third parties.

We will only then share your personal data if necessary and only with vendors or agents who work on our behalf for the purposes described in this Privacy Statement. In that case, your personal data are therefore shared with these agents, but only for the performance of services and on behalf of Fondazione ICONS.

Finally, and only to the extent that this is required by law or strictly necessary for the performance of the services or for the protection of our rights, or the rights of third parties or data subjects affiliated with us, we will provide your personal data to law enforcement agencies, research organizations, affiliated companies or in court proceedings.

## **10 How to exercise your rights**

In order to allow you to exercise your rights, Fondazione ICONS implemented internal procedures described hereby. If you would like to know more or exercise your rights, please contact:

- the Fondazione ICONS Headquarter contacting: phone +39 0371 091065
- the Fondazione ICONS eNeuron Communication Manager, Mr Mark Thompson: [mark.thompson@icons.it](mailto:mark.thompson@icons.it)

- person responsible for the Fondazione ICONS Database, Ms. Costanza Caffo: [icons@icons.it](mailto:icons@icons.it).

Below we report an exhaustive list of your rights:

1. Right to be informed: about our purposes for processing the personal data, retention periods for that personal data, and whom it will be shared with.
2. Right of access: to access personal data
3. Right to rectification: Under Article 16 of the GDPR, individuals have the right to have inaccurate personal data rectified
4. Right to erasure: Under Article 17 of the GDPR individuals have the right to have personal data erased. This is also known as the 'right to be forgotten
5. Right to restrict processing: Article 18 of the GDPR gives individuals the right to restrict the processing of their personal data in certain circumstances. This means that an individual can limit the way an organisation uses their data. This is an alternative to requesting the erasure of their data
6. Right of data portability: gives individuals the right to receive personal data they have provided to a controller in a structured, commonly used and machine readable format. It also gives them the right to request that a controller transmits this data directly to another controller.
7. Right to object: Article 21 of the GDPR gives individuals the right to object to the processing of their personal data. This effectively allows individuals to ask to stop processing their personal data.
8. Rights related to automated decision making including profiling
9. Right to report a misconduct to the Italian Privacy authority.

You can file an official complaint with the Data Protection Authority:  
[www.garantedellaprivacy.it](http://www.garantedellaprivacy.it)

( <https://www.garanteprivacy.it/en/home/docweb/-/docweb-display/docweb/1089924>)

## **11 Changes to Privacy Notice**

If necessary, we may amend or update this Privacy Statement to reflect changes on the website and feedback from our users. If there are material changes in the way we use or process your personal data, we will notify you by posting a notice of the changes before these come into effect or by sending a notification to you directly. We encourage you to re-read this statement regularly to gain more information on how we use and protect your data.

October 2020