



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: European network of businesses and SMEs for Industrial Symbiosis (Circlean).

Data Controller: European Commission, Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs, Unit I3 - Green and circular economy (hereinafter “DG GROW Unit I.3” or the “Data Controller”)

Data processor: Technopolis Group, Arctik, Trinomics and International Synergies Ltd. (hereinafter “Data Processor”).

Record reference: DPR EC 09786

Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?

1. Introduction

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](#) 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 we collect, handle and ensure protection of all personal data provided, 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.

The information in relation to processing operation “European network of businesses and SMEs for Industrial Symbiosis (Circlean)” undertaken by the Data Controller is presented below.

2. Why and how do we process your personal data?

The Data Controller processes your personal data to collect contact information (first name, last name, e-mail address and other voluntary personal information) to be able to respond to public who have sent a message via the contact form on the website.

The public IT website <https://circlean-symbiosis.eu/> may contain personal data in the form of contact details and photos of events. This website may collect personal data via cookies based on consent <https://circlean-symbiosis.eu/cookie-policy/>. Your data will not be used for an automated decision-making, including profiling.

3. On what legal ground(s) do we process your personal data?

We process your personal data, because processing is necessary

- (a) for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (Article 5(1)(a) of Regulation (EU) 2018/1725), in particular Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union.
- (b) for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract.
- (c) because you have given consent to the processing of your personal data for subscription to the newsletter, and for gathering statistics through the use of cookies via a clear affirmative act by ticking a box on the contact form/signing a consent form. Your consent for this purpose can be withdrawn at any time by writing to GROW-13@ec.europa.eu.

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the Data Controller processes the following categories of personal data:

- Contact and profile data (optional): first name, last name, e-mail, photograph, articles and quotes.
- Internet Protocol address (IP address) or the device ID of the device used to access the website.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the abovementioned purposes. For each of the categories of personal data that is processed, please find below the retention details:

- The data will be stored for the duration of the contract which ends on November 2022.
- The optional data mentioned above can be deleted at any moment upon your request, as it is not necessary for getting access to the platform itself.
- In case the group or the IT tool are permanently discontinued, all data will be pseudonymised and kept for a maximum of 5 years.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission and/or of its contractors. 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 has put in place a number of technical and organisational measures. 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.

7. 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.

Four member of consortium (one of them – International Synergies Ltd - is located in UK) have also access to the personal data.

The mandatory contact details and photos of events are published on the website. In addition, your other personal data may be published on the website should a quote or article be published about the CircLean Network members.

Cookies

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

When you visit the website <https://circlean-symbiosis.eu/>, we will keep the browser history of your visit for a maximum of 11 months. This information will then be deleted. The collection, aggregation and anonymising operations are performed in a data centre located within the EEA under adequate security measures.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the contractors' control. These cookies are not used for any purpose other than those described here.

Cookie policy can be found on the website: <https://circlean-symbiosis.eu/cookie-policy/>.

Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the *CircLean project* through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users read the relevant privacy policies of [Twitter](#), [LinkedIn](#), [Facebook](#), and [YouTube](#), carefully before using them. These explain each company’s policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

International transfers

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Transfer of your personal data to one member of the consortium in UK is lawful under Article FINPROV.10A of the Trade and Cooperation Agreement agreed by EU and UK negotiators on 24 December 2020. Should any change occur to this legal framework, the controller will implement any appropriate measure to ensure that your personal data is protected when transferred to processor in the UK.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. 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, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.

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 by writing to GROW-13@ec.europa.eu. The withdrawal of your consent 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.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

9. 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, DG GROW, unit I.3. Green and circular economy, e-mail: GROW-13@ec.europa.eu.

- The Data Protection Officer (DPO) of the Commission

In case of disagreement with the Data Controller, you may contact the Data Protection Officer (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 or https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) 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.

10. Where to find more detailed information?

The Commission 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 09786.