



## Privacy Policy

### Privacy Policy in accordance with art. 13 GDPR

SINTEF AS [VAT number: NO919303808MVA], COMUNE DI PADOVA [VAT number: 00644060287], INSTITUTE FOR SECURITY POLICIES [VAT number: 21013101] and OSLO KOMMUNE [VAT number: NO976819837MVA] are the Joint Controllers of the personal data which you will provide by using the website [www.impetus-project.eu](http://www.impetus-project.eu) (the “Website”). In this Policy we will also refer to you as the “Data subject”, that is the person to whom the personal data relate.

Join Controllers have appointed data protection officers:

- For SINTEF: [jan.wage@sintef.no](mailto:jan.wage@sintef.no)
- For the City of Oslo: [eirik.baerulfsen@ber.oslo.kommune.no](mailto:eirik.baerulfsen@ber.oslo.kommune.no)
- For the City of Padova: [dpo@comune.padova.it](mailto:dpo@comune.padova.it)

If you have any doubt regarding the processing of your data or if you want to exercise your rights, please get in touch using the “CONTACT US” entry on the project website [www.impetus-project.eu](http://www.impetus-project.eu).

### Which personal data do we collect?

Through the Website, we collect the following data:

- Browsing data: the computer systems and software procedures used to operate the Website collect some personal data, whose transmission is an integral part of Internet communication protocols. We cannot directly identify you through such data, but this could still be possible in the event that they are elaborated and associated with other set of data provided elsewhere. We collect in particular information about:

- your IP address;
- the URI (Uniform Resource Identifier) of the requested sources;
- the time and date in which you use the Website;
- the operating system, the browser used, the screen resolution and other information relating to the device environment.

- Data provided on a voluntarily basis (e.g., e-mail address): the Joint Controllers will process these data, in accordance with the applicable law, to achieve the purposes specified in each form and in this Policy. The indication of certain data is compulsory in order to ensure the correct performance of the services

required to the Joint Controllers. We presume that the data you communicate refer to you or to third parties who have authorised you to provide them. In this case, you assume all relevant obligations and responsibilities.

## **How do you process my data? On which legal basis?**

In all the cases in which the Joint Controllers process your data, they are allowed to do so pursuant to a specific legal basis which legitimates the processing.

Sometimes we need your consent to process your personal data, for example in order to send you a newsletter.

Other times, when the applicable law allows it and having respect to your rights, Joint Controllers may process your data without asking your consent. We are allowed to do so when we process your data to comply with a legal obligation or to reply to a request that you made by contacting us or by requiring services through the Website.

Any refusal to provide data which are indicated as “necessary” may prevent the Joint Controllers from replying to your requests or from complying with legal obligations to which the Joint Controllers are subject.

At the end of the data retention period, the collected personal data will be irreversibly anonymised or deleted.

<b>PERSONAL DATA SUBJECT TO PROCESSING</b>	<b>PURPOSES</b>	<b>LEGAL BASIS</b>	<b>RETENTION PERIOD</b>
Data provided in e-mails sent to e-mail addresses	To respond to requests	6.1.b GDPR – Contract or steps prior to entering into a contract	For the duration necessary to respond to your requests. For the period necessary for the establishment, exercise or defence of legal claims.
Contact data for the newsletter	To send you newsletters about development of the IMPETUS project	6.1.a GDPR - Consent	Until you withdraw your consent or until 1 year after the last newsletter of the Project was sent
Data collected through cookies	As regards technical or analytics cookies, to track your activities on the Website, in order to improve our services.	6.1.a GDPR - Consent	Until the end of each browsing session or for the retention period indicated for each specific cookie (see the Cookie Policy).
	As regards profiling cookies, the data collected with your previous consent may be processed also by third parties (as indicated in the Cookie Policy) and will be used to show you targeted advertisement on this and on other websites; if you do not accept them, you will still see advertisements, but they will not be based on your interests.	6.1.b GDPR – Contract or steps prior to entering into a contract	

### **Will my data be shared with other subjects?**

Your personal data may be disclosed, in close relation to the purposes specified above, only to:

- subjects authorised by the Joint Controllers to process personal data, that are committed to, or under, an appropriate statutory obligation of confidentiality;
- subjects in charge of the maintenance of the Website, who will act as data processors;
- Partners of the Consortium of the IMPETUS Project, who will act as data processors.

If you accept third parties' cookies, your data will be shared with the subjects indicated in our Cookie Policy.

On the Website you find some links which lead to the social network pages of the IMPETUS Project, to allow an easy access to those contents. Such links do not send your personal data to the social networks as long as you are on our Website and do not click on them. The processing of personal data by social network platforms is regulated by their own privacy policies

## Which rights do I have as a Data Subject?

You will always keep control on your personal data.

More specifically, you have the right:

- to request information about the personal data processed by the Joint Controllers and to receive in a structured, commonly used and machine-readable format the personal data concerning you;
- not to be subject to a decision based solely on automated processing, unless you have provided your explicit consent;
- to ask the Joint Controllers the rectification or the erasure of your personal data or the restriction of their use only for certain purposes;
- to change your idea and ask us to stop processing your data, for example by deleting your account.

In some limited cases we may not be able to comply with your requests, as long as it is forbidden by law provisions or by the act of a public authority.

Requests to exercise your right should be sent using the “CONTACT US” entry on the project website [www.impetus-project.eu](http://www.impetus-project.eu). In any case, you have the right to lodge a complaint with the relevant supervisory authority (Data protection Authority) if you believe that the processing of your personal data is against the applicable law.

## Where do you store my data?

We store your data also in servers located outside the European Economic Area.

However, the service providers, as external Data Processors, declare that the third countries guarantee an adequate level of protection of data subjects rights by virtue of compliance with one or more of the conditions set out in Articles 45-47 of the GDPR. Data collected by third parties' cookies may be transferred to Third countries as provided for in our Cookie Policy and in such third parties' privacy policies.

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