



Data Protection Notice for European Cluster Collaboration Platform

Your personal data is processed in accordance with Regulation (EU) No 2018/1725¹ on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

The data controller of the processing operation is Head of Unit I.02 (SMP/COSME Pillar) of the European Innovation Council and SME Executive Agency (EISMEA).

The following **entities process** your personal data on our behalf: 1) IMP³ROVE – European Innovation Management Academy EWIV, Dreischeibenhäuser 1, 40211 Düsseldorf, Germany, whose functional mailbox is data.privacy@improve-innovation.com, in cooperation with: 2) AgriFood Lithuania DIH, Mokslininku st. 2A, LT-08412 Vilnius, Lithuania, 3) European Cluster Alliance, Rue Belliard 40, 1040 Etterbeek, RPM Brussels, Belgium, 4) Association Européenne des Agences de Développement, Rue Montoyer 24 bte 13, B-1000 Brussels, Belgium, 5) Inpulse Partners SRL, Calea Floreasca 167 bis, et 4, cam 2, 014459 Bucharest, Romania, 6) Intracto, Zavelheide 15, 2200 Herentals, Belgium, 7) LOW Associates Brussels SRL, Rue de la Longue Haie, 63, Boite 1, 1000 Brussels, Belgium, 8) Polish Cluster Association (Związek Pracodawców Klastry Polskie), ul. Księcia Bolesława 1/3, 01-452 Warszawa, Poland, 9) Asociación IDiA, Calle Eduardo Ibarra 6, 50009 Zaragoza, Spain, 9) Prognos AG, Rue de la Loi 155, Brussels, Belgium, Brussels, VDI/VDE Innovation + Technik GmbH, Steinplatz 1, 10623 Berlin, Germany, and 10) Consulting Cluster Veritas Ltd, 34, Bogatitsa Street, Office A-01, Sofia, 1421, Bulgaria.

The legal basis for the processing activities are:

- Article 5(1)(a) of Regulation EU 2018/1725 because processing is necessary 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)²;
- Article 5(1)(d) of Regulation EU 2018/1725 based on your explicit consent for your non-mandatory personal data indicated below;

The purposes of this processing are to:

- allow the recreation of the European Cluster Collaboration Platform (ECCP) and the revision and development of services in support of clusters and other related activities;
- register Clusters Organisations, Members of cluster organisations, European

¹ 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, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L295/39 of 21.11.2018).

² Act of Establishment: COMMISSION IMPLEMENTING DECISION (EU) 2021/173 of 12 February 2021 establishing the European Climate, Infrastructure and Environment Executive Agency, the European Health and Digital Executive Agency, the European Research Executive Agency, the European Innovation Council and SMEs Executive Agency, the European Research Council Executive Agency, and the European Education and Culture Executive Agency and repealing Implementing Decisions 2013/801/EU, 2013/771/EU, 2013/778/EU, 2013/779/EU, 2013/776/EU and 2013/770/EU.

Cluster Partnerships and Initiatives, National cluster associations, Meta-clusters and networks of clusters, Resource efficiency support actors, Training providers or Policy or public institutions;

- manage ECCP newsletters and subscriptions;
- facilitate exchanges between registered members, partake in online discussion forums, allow members to search for and connect with partners;
- establish user accounts;
- register for events;
- access services related to the ClusterXchange pilot scheme;
- evaluate the performance of the ECCP.

In addition to the above main purposes, it will also allow to share basic information of the registered ECCP organisations with the wider community of the “EU Open Data Portal³”, integrating the ECCP and other databases of innovation actors, and the “Common Data Model for Innovation Supporting Actors” (CMISA) project⁴.

The following of your personal data are collected: Title, First Name, Last Name, Job Title, Gender, professional email address, geolocation, IP address, and browser-generated information, cookies or other technologies used to track users’ activity. These elements are **mandatory** for the purposes outlined above.

Please note, however, that only your contact information (Title, First Name, Last Name, Job Title and professional email address) will be collected for the purpose of sharing information on the “EU Open Data Portal”.

In addition, the following **non-mandatory** personal data are collected: Phone Number, photo and details of social media accounts can only be processed based on your explicit prior consent.

If personal data has not been obtained directly from a data subject, it was obtained from publicly accessible sources, such as websites of cluster organisations, websites of companies, and other publically accessible databases. A disclaimer will therefore be used for key cluster members who update data for other cluster managers and/or other relevant staff.

Prior consent has been obtained from the persons whose email addresses or other personal data have been used

The recipients of your personal data will be competent EISMEA and Commission staff in charge of the ECCP and the “EU Open Data Portal”, and staff of EISMEA’s (sub)contractors in charge of the ECCP. The collected personal data might also be communicated to bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF)).

Your personal data **will not be transferred** to third countries or international organisations. However, please note that the ECCP uses third-party tools (listed below) with their own privacy policies, which you are strongly suggested to read carefully.

The processing of your data will not include automated decision-making (such as profiling).

³ <https://data.europa.eu/euodp/en/home>

⁴ <https://joinup.ec.europa.eu/collection/cmisa/solution/cmisa/about>

Your personal data will be kept for a maximum period of **10** years after the end of the Single Market Programme (SMP). Data will be deleted at the end of this period.

You have the right to access your personal data and to request your personal data to be rectified, if the data is inaccurate or incomplete; where applicable, you have the right to request restriction or to object to processing, to request a copy or erasure of your personal data held by the data controller. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

If you have **any queries** concerning the processing of your personal data, you may address them to Head of Unit SMP/COSME-Pillar Unit I.02 of the EISMEA (entity acting as data controller) via: contact@clustercollaboration.eu.

You shall have right of recourse at any time to the EISMEA Data Protection Officer at EISMEA-DPO@ec.europa.eu and to the European Data Protection Supervisor at <https://edps.europa.eu>.

The above terms of use are made publically available through <https://www.clustercollaboration.eu/terms-use>.

Third party tools

MailerLite

For the purpose of sending newsletters, notifications and alerts from the web platform MailerLite, a third party tool under LOW's responsibility, collects name, email address, organisation and other relevant information for tailored marketing content as provided in the users' ECCP profile. All marketing will be strictly opt-in only. MailerLite's GDPR statements can be found here: <https://www.mailerlite.com/gdpr-compliance>

Matomo

For the purpose of analysing website traffic and improving the website user experience, Matomo, a third party tool under iO/Intracto's responsibility, processes email addresses, IP address and cookies. Matomo's privacy policy can be found here: <https://matomo.org/privacy-policy/>

Meltwater

For the purpose of analysing ECCP and EREK media channels and traffic and improving the communications activities, Meltwater, a third party tool under LOW's responsibility, processes email addresses, IP address and cookies. Meltwater's privacy policy can be found here: <https://www.meltwater.cn/privacy/gdpr>

Airtable

For the purpose of managing the project, Airtable, a third party tool under LOW's responsibility, processes email addresses, IP address and cookies. Airtable's privacy policy can be found here: <https://www.airtable.com/privacy>

B2Match

For the purpose of facilitating match-making events, B2Match, a third party tool managed by Eurada, collects personal data. B2Match's privacy policy can be found here: <https://www.b2match.com/privacy-policy>

Cloudflare

For the purpose of web optimization and for the provision of security services, Cloudflare, a third party tool managed by iO/Intracto, collects end users' information. This information may include but is not limited to IP addresses, system configuration information, and other information about web traffic. Cloudflare's privacy policy can be found here: <https://www.cloudflare.com/privacypolicy/>

G Suite (Google)

For the purpose of facilitating various helpline mailboxes, G Suite (Google), a third party tool managed by iO/Intracto, collects personal data including email addresses. Google's privacy policy statement can be found here: <https://policies.google.com/privacy?hl=en-US>

SendGrid

For the purpose of Simple Mail Transfer Protocol (SMTP) server to send emails, SendGrid is a third party tool managed by iO/Intracto. SendGrid's privacy policy can be found here: <https://api.sendgrid.com/privacy.html>

Teams (Microsoft)

For the purpose of coordinating discussions between the client, contractors, sub-contractors and experts, Teams, a third party tool managed by IMP³ROVE and above partners, collects personal data including email addresses. Teams' privacy policy statement can be found here: <https://privacy.microsoft.com/en-us/privacystatement>

Webex (Cisco)

For the purpose of coordinating discussions between the client, contractors, sub-contractors and experts, Webex, a third party tool managed by IMP³ROVE and above partners, collects personal data including email addresses. Cisco's privacy policy statement can be found here: https://www.cisco.com/c/en_uk/about/legal/privacy-full.html

Zoom

For the purpose of coordinating discussions between the client, contractors, sub-contractors and experts, Zoom, a third party tool managed by Eurada and above partners, collects personal data including email addresses. Zoom's privacy policy statement can be found here: <https://explore.zoom.us/de/privacy/>

LinkedIn

For the purpose of enabling platform participants to connect, discuss and share ideas, LinkedIn Groups, a third party tool managed by Low and above partners, collects personal data including email addresses. LinkedIn's privacy policy can be found here: <https://www.linkedin.com/legal/privacy-policy>

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 or for gathering statistics.

Cookies are also typically used to provide a more personalised experience for a user for example, when an online service remembers your user profile without you having to login.

When you visit our website, we may collect some data on your browsing experience such as your IP address, the ECCP page you visited, when you visited and the website page you were redirected from.

This information is used to gather aggregated and anonymous statistics with a view to improving our services and to enhance your user experience.

Social Media

We use social media to present our work through widely used and contemporary channels.

Our use of social media is highlighted on this website. For instance, you can watch videos, which we upload to our YouTube page and follow links from our website to Twitter and LinkedIn.

Cookies are not set by our display of social media buttons to connect to those services when our website pages are loaded on your computer (or other devices) or from components from those services embedded in our web pages.

Each social media channel has their own policy on the way they process your personal data when you access their sites. For example, if you choose to watch one of our videos on [YouTube](#), you will be asked for explicit consent to accept YouTube cookies; if you look at our Twitter activity on [Twitter](#), you will be asked for explicit consent to accept Twitter cookies; the same applies for [LinkedIn](#).

If you have any concerns or questions about their use of your personal data, you should read their privacy policies carefully before using them.

However, if you do not view the social media content, no third-party cookies are installed on your device.

Twitter disclaimer

Twitter is used by the ECCP for information purposes only.

ECCP follows some Twitter users. However, being followed by the ECCP does not imply endorsement of any kind. The ECCP reserves the right to not reply individually to messages or comments received on Twitter.

The use of Twitter by the ECCP, including the Twitter hyperlink, does not in any way imply endorsement of Twitter and/or its Privacy Policy. Twitter may occasionally be unavailable and the ECCP accepts no responsibility for lack of service due to Twitter downtime.

The ECCP recommends that users read the [Twitter Privacy Policy](#) that explains Twitter's policy of data collection and processing, the use of data by Twitter and includes a list of users' rights and the ways in which they can protect their privacy when using Twitter.

Newsletters

In order to subscribe to ECCP's newsletters, you have to provide an email address where you wish to receive them.

ECCP keeps only the current state of data. No history is saved. Each change of your subscription erases instantly previous data; this includes also cancelling your subscriptions.

You can unsubscribe anytime by clicking on the 'unsubscribe' link available in the footer of each individual newsletter.

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