



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 A1 (COSME²) of the Executive Agency for Small and Medium-sized Enterprises (EASME).

The following **entities process** your personal data on our behalf: 1) Ecorys Europe EEIG, 12, Rue Belliard, B-1040 Brussels, Belgium, privacy@ecorys.com, in cooperation with: 2) Basque Institute of Competitiveness — Deusto Foundation (Orkestra), 3) Sociedade Portuguesa de Inovação, Consultadoria Empresarial e Fomento da Inovação, S.A. (SPI) and 4) VVA Brussels

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)³;
- Article 5(1)(d) of Regulation EU 2018/1725 based on your explicit consent for the processing of 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 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;

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 Regulation (EU) No 1287/2013 of the European Parliament and of the Council of 11 December 2013 establishing a Programme for the Competitiveness of Enterprises and small and medium-sized enterprises (COSME) (2014 - 2020).

³ Act of Establishment: Commission Implementing Decision C(2013/771/EU) of 17 December 2013 establishing the 'Executive Agency for Small and Medium-sized Enterprises' and repealing Decisions 2004/20/EC and 2007/372/EC and entrusted with the implementation of the COSME Programme.

- access services related to the ClusterXchange⁴ pilot scheme;
- evaluate the performance of the ECCP; and
- share contact information of the registered ECCP organisations and their contact persons with the “EU Open Data Portal⁵”, integrating the ECCP and other databases of innovation actors, and the “Common Data Model for Innovation Supporting Actors” (CMISA) project⁶.

The following of your personal data are collected: Title, First Name, Last Name, Job Title, Gender, professional email address. These elements are **mandatory** for the purposes outlined above.

In addition, geolocation of the registered organisation, IP address, and browser-generated information, cookies or other technologies are used to track users’ activity. For more details, please see below the section on third parties and cookies.

Please note, however, that only your contact information (Title, First Name, Last Name, Job Title and professional email address) will be shared on the “EU Open Data Portal”, which is publicly accessible.

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 public websites of cluster organisations, websites of companies, and other publically accessible databases. A disclaimer on the registration page and when editing a cluster organisation profile 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 general public and users of the ECCP platform, including authorised Agency and Commission staff in charge of the ECCP and the “EU Open Data Portal”, and staff of the Agency’s or Commission’s (sub)contractors in charge of the ECCP and members of the “EU Open Data Portal” community. 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 and the “EU Open Data Portal” can be accessed also from countries out-side of the European Union. In addition 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).

⁴ ClusterXchange is a new pilot scheme to support short-term exchanges to better connect Europe’s industrial ecosystems. It is implemented with support from cluster organisations that have teamed up in [European Cluster Partnerships for Excellence](https://clusterpartnershipsforexcellence.eu/). More information on: <https://clustercollaboration.eu/clusterxchange>

⁵ <https://data.europa.eu/euodp/en/home>

⁶ <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 COSME programme. 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 A1 (COSME) (entity acting as data controller) via: EASME-COSME-DP@ec.europa.eu

You shall have right of recourse at any time to the EASME Data Protection Officer at EASME-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

SendinBlue

For the purpose of sending newsletters, notifications and alerts from the web platform SendinBlue, a third party tool under Ecorys' 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. SendinBlue's GDPR statements can be found here: <https://www.sendinblue.com/gdpr/>.

Matomo

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

B2Match

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

Cloudflare

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

YouTube (Google)

For the purpose of collecting analytics related to video content, YouTube, a third party tool managed by Ecorys, collects end users' information. This information may include but is not limited to IP addresses. Google's privacy policy statement can be found here: <https://policies.google.com/privacy?hl=en-US>

Vimeo

For the purpose of collecting analytics related to video content, Vimeo, a third party tool managed by Ecorys, collects end users' information. This information may include but is not limited to IP addresses. Vimeo's privacy policy statement can be found here: <https://vimeo.com/privacy>

Webex (Cisco)

For the purpose of coordinating discussions between the client, contractors, sub-contractors and experts, Webex, a third party tool managed by Ecorys, 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

idloom

For the purpose of coordinating and managing events, idloom, a third party tool managed by Ecorys, collects personal data including email addresses. Idlooms privacy policy can be found here: <https://www.idloom.com/en/events/personal-data>

GoToWebinar (LogMeIn)

For the purpose of facilitating online webinars with end-users, GotoWebinar, a third party tool, managed by Ecorys and above partners, collects personal data including email addresses. LogMeIn's privacy policy statement can be found here: <https://www.logmeininc.com/legal/privacy>

GoToMeeting (LogMeIn)

For the purpose of coordinating discussions between the client, contractors, sub-contractors and experts, GoToWebinar, a third party tool, managed by Ecorys and above partners, collects personal data including email addresses. LogMeIn's privacy policy statement can be found here: <https://www.logmeininc.com/legal/privacy>

EUSurvey

For the purpose of undertaking online surveys, EUSurvey, a third party tool managed by Ecorys and above partners, collects personal data including email address, Title, First Name and Last. The EUSurvey tool's privacy policy can be found here: <https://ec.europa.eu/eusurvey/home/privacystatement>

LinkedIn

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

SurveyGizmo

For the purpose of undertaking online surveys, SurveyGizmo, a third party tool managed by Ecorys, collects personal data including email address, Title, First Name and Last Name. SurveyGizmo's privacy policy can be found here: <https://www.surveygizmo.com/privacy/>

Mapbox

For purpose of providing image tiles for web mapping, Mapbox, a third party tool managed by Ecorys, collects personal data including, IP address, device and browser information, operating system, the content of the request, the date and time of the request, and limited location and usage data. Mapbox's privacy policy can be found here: <https://www.mapbox.com/legal/privacy/>

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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