



## Data Protection Notice for ClusterXchange scheme

**Your personal data** is processed in accordance with Regulation (EU) No 2018/1725<sup>1</sup> 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 (COSME<sup>2</sup>) 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, whose functional mailbox is [privacy@ecorys.com](mailto:privacy@ecorys.com), in cooperation with: 2) Sociedade Portuguesa de Inovação, Consultadoria Empresarial e Fomento da Inovação, S.A. (SPI) and 3) Eurotop Cooperation Partners.

**The legal basis** for the processing activities is:

- 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)<sup>3</sup>.

**The purpose** of this processing is to use such information necessary for the implementation of the ClusterXchange pilot scheme and to allow the user to access the services related to the scheme. The personal data will be visible by other validated users registered in the ClusterXchange IT tool to optimize and facilitate the matching and exchanges between participants.

**The following of your personal data are collected:** first name, last name, job title, email address, phone number, nationality, spoken languages, name of the employer and other data voluntarily included in the provided curriculum vitae. These elements are **mandatory** for the purpose(s) outlined above.

**The recipients** of your personal data will be competent EASME and Commission staff in charge of the ClusterXchange scheme, the staff of EASME's (sub)contractors in charge of the scheme, the staff of the European Strategic Cluster Partnerships for Excellence responsible for the implementation of ClusterXchange and where requested as part of the matching and exchanges between participants, the other registered validated users. 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.

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<sup>1</sup> 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).

<sup>2</sup> 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).

<sup>3</sup> 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

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

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. You have the right to withdraw your consent at any time via Email sent to the ClusterXchange Support Office ([Clusterxchange@clustercollaboration.eu](mailto:Clusterxchange@clustercollaboration.eu)), without affecting the lawfulness of the processing based on your consent before its withdrawal. In this case your registered profile will be deleted from the IT tool or if it is already matched with another profile, it becomes invisible for any other profiles.

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](mailto: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](mailto:EASME-DPO@ec.europa.eu) and to the European Data Protection Supervisor at <https://edps.europa.eu>.

## **Third-party tools**

### **SendGrid (Twilio)**

For the purpose of sending notifications and alerts from the web platform, SendGrid (owned by Twilio) a third party tool under Ecorys' responsibility, collects emails addresses. Twilio's privacy shield statement can be found here: <https://www.twilio.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.

The IT tool of the ClusterXchange scheme only uses one cookie for the session, meaning an essential cookie that is used to recognize the logged in user.

### **Amazon Simple Storage Services**

For the purpose of data storage, Amazon Simple Storage Services, a third-party tool managed by Ecorys, collects end users' information. This storage service will concern all

personal information provided by the user. The servers of the Amazon Simple Storage Services are located in the European Union. Amazon Web Services' privacy notice is available at: <https://aws.amazon.com/privacy/>.

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