

PRIVACY POLICY (A)

General Project Participation and Project-Management–Related Data Collection

GENERAL

We are GREENOVATE! EUROPE, with registered address Avenue Louise 231, 1050 Brussels (referred to herein as “we”, “us” or “our”, as the context requires). This Privacy Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed in connection with your participation in the **NEXRUR** project, funded by the European Union under **Grant Agreement No. 101181273**. This notice applies to individuals who engage with the project in a non-research capacity, including but not limited to participants in project events, stakeholders attending workshops or panels, representatives of institutions and organisations involved in coordination and dissemination activities, and persons interacting with project communications, platforms or administrative processes.

For the purposes of the General Data Protection Regulation (EU) 2016/679 (**GDPR**) and the UK GDPR, we act as the **controller** of your personal data in the contexts described in this Policy. We may update this Privacy Policy from time to time to reflect legal, regulatory or operational changes. Where changes are material, we may notify you using the contact details you have provided to us or through official project communication channels.

PURPOSES AND BASIS FOR THE PROCESSING OF YOUR DATA

We will process your personal data strictly for the purposes that are necessary to organise, administer and deliver the activities associated with the general management and participation in NEXRUR. This includes, without limitation: (i) registering and facilitating your attendance at project events such as workshops, trainings, conferences, stakeholder panels, case community meetings and other gatherings; (ii) coordinating communication among participants and partners to ensure appropriate engagement and contribution to activities; (iii) managing subscriptions to newsletters or briefings and distributing project communications, public updates and reports; (iv) providing access to project platforms, tools, repositories or networks that are needed for collaboration and dissemination; (v) maintaining records for audit, monitoring, reporting and compliance purposes as required under Horizon Europe rules; and (vi) monitoring and evaluating project implementation against objectives, including where necessary collating participation statistics or feedback to improve the effectiveness and inclusiveness of activities.

The principal legal basis for this processing is **your consent** (GDPR Art. 6(1)(a)), which we will seek prior to engaging in activities that involve the handling of your personal data. You may withdraw your consent at any time by contacting us using the details below. We may also process your data where it is necessary to **comply with a legal obligation** (GDPR Art. 6(1)(c)), including obligations to the European Commission or relevant authorities; for the performance of a task carried out in the **public interest** (GDPR Art. 6(1)(e)) in the context of EU-funded programmes; or on the grounds of **legitimate interests** (GDPR Art. 6(1)(f)) pursued by us or a third party, provided that such interests are not overridden by your fundamental rights and freedoms. Where we rely on legitimate interests, we will conduct and keep records of a Legitimate Interest Assessment to document the balancing exercise carried out.

DATA WE COLLECT ABOUT YOU

The categories of personal data we may collect and process in this context are those strictly necessary to support project participation and administration. These may include: (a) Identification and contact details (e.g., your full name, email address, telephone number,

postal address and country of residence), necessary for registration, communication and organisational purposes;

(b) Professional information (e.g., your organisation, role or position, sector or domain of activity, declared areas of expertise, and your relationship to the project, such as stakeholder, farmer, researcher, policy-maker or community representative), used to tailor communications and ensure relevant engagement;

(c) Participation data (e.g., event registration details, attendance records, contributions during workshops or meetings, survey responses, session preferences and feedback), used for logistics, reporting and improving future activities;

(d) Audio-visual materials (e.g., photographs or recordings captured during events for documentation and dissemination purposes), which will only be collected and used in accordance with applicable law and on an appropriate legal basis, typically consent;

(e) Communication data (e.g., your emails, forms and other correspondence), maintained to ensure we can respond to queries, manage requests and preserve an accurate audit trail;

(f) Platform and website usage data (e.g., IP address, browser type and version, device identifiers, log data and analytics cookies) to support secure access, performance monitoring, troubleshooting and user experience improvements;

(g) Newsletter subscription data (e.g., your subscription preferences and records of consent).

We do not intentionally collect **special category data** (GDPR Art. 9) in the context of general participation and project management. Should a specific activity inadvertently or exceptionally require such data (for example, accessibility needs), we will clearly inform you and seek your **explicit consent** prior to any processing, and will apply additional safeguards.

DISCLOSURE OF YOUR INFORMATION

We do not sell or rent your personal data. We may disclose your personal data only as strictly necessary for the proper delivery of project activities, compliance and reporting. Recipients may include: other **members of the NEXRUR consortium** for coordination, reporting and dissemination tasks; **authorised third-party service providers** acting under our instructions and bound by Data Processing Agreements (e.g., IT and cloud hosting providers, platform administrators, mailing and communication services, event management tools); **the European Commission or the relevant agency** in connection with audits, reviews, monitoring and reporting obligations; **public authorities or supervisory bodies** where required by applicable law or enforceable governmental request; and **external auditors or legal advisors** engaged to ensure compliance with contractual, regulatory or legal obligations. In each case, we require recipients to process personal data lawfully, securely and only for the specified purposes in accordance with our documented instructions.

INTERNATIONAL DATA TRANSFERS

Where the processing of your personal data involves transfer to countries outside the European Economic Area (EEA) or the UK, and where those jurisdictions may not provide the same level of data protection as your home country, we will ensure that appropriate safeguards are in place. These safeguards may include the use of **European Commission adequacy decisions**, **Standard Contractual Clauses** approved by the European Commission or the UK, or ensuring that US recipients participate in the **EU-US Data Privacy Framework** (or UK Extension where applicable). Further information on the safeguards relied upon may be requested by contacting us at greenovateeurope@gmail.com.

In addition, for NEXRUR's EU-China collaboration, no personal data will be transferred to China or any other non-EEA/non-UK country as part of NEXRUR's EU-China collaboration. All

exchanges with Chinese partners rely exclusively on anonymised, aggregated or otherwise non-identifiable information, in line with the Grant Agreement and the project's ethics requirements. Where international transfers of personal data are strictly necessary for other project purposes, they will only occur under GDPR-compliant safeguards such as adequacy decisions, Standard Contractual Clauses, or equivalent mechanisms.

DATA RETENTION

We will retain your personal data only for as long as necessary to fulfil the purposes described in this Privacy Policy or to comply with applicable legal, regulatory and audit requirements. In determining appropriate retention periods, we consider the nature and sensitivity of the data, the purposes for which it is processed, the existence of any statutory obligations, and the operational need to maintain records for accountability and reporting under Horizon Europe. Once data is no longer required, we will securely delete or anonymise it. Where anonymisation is possible and appropriate, we may retain anonymised data for statistical or reporting purposes, as it no longer constitutes personal data.

DATA SECURITY

We implement appropriate **technical and organisational measures** designed to protect your data against unauthorised access, accidental loss, destruction or damage. Such measures may include, as appropriate to risk: access controls based on roles and need-to-know, secure authentication, encryption in transit and at rest, network and application security safeguards, regular backups and tested restoration procedures, logging and monitoring of access, least-privilege principles, and staff training on data protection and confidentiality. Where data is handled in collaborative environments or repositories used by the consortium, permissions are configured to ensure that only authorised users can access relevant materials.

YOUR RIGHTS

You have certain rights under the GDPR and UK GDPR with respect to your personal data, subject to limitations set out in law. These include the right to request **access** to your data, request **rectification** of inaccurate or incomplete data, request **erasure** where there is no overriding reason for continued processing, request **restriction** of processing in certain circumstances, **object** to processing where it is based on legitimate interests or public task (including objecting to direct marketing), and request **data portability** in a structured, commonly used and machine-readable format. Where processing is based on consent, you also have the right to **withdraw your consent** at any time. To exercise your rights, please contact us at greenovateeurope@gmail.com. We will respond within the timeframes established by applicable law.

CONTACT AND COMPLAINTS

If you have any questions, comments or requests regarding this Privacy Policy or our processing of your personal data, please contact greenovateeurope@gmail.com.

[ONLY IF APPLICABLE] You may also contact our Data Protection Officer at.

You have the right to lodge a complaint with your national **supervisory authority** if you believe that your data protection rights have been infringed.

CONSENT TO USE OF AUDIO-VISUAL MATERIALS (GENERAL PARTICIPATION)

From time to time, we may wish to use photographs or short recordings from project events for communication or dissemination. Where such materials would make you identifiable, we will seek your **explicit consent** prior to publication, explaining the precise purpose, medium and scope (e.g., project website, newsletters, public reports). You are entirely free to refuse or withdraw consent without any adverse consequences for your participation in the project.