

Policy for Privacy

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LifeWatch ERIC respects your privacy and is committed to protecting your personal data. This privacy policy will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

1. Important information and who we are

Purpose of this privacy policy

This privacy policy aims to give you information on how LifeWatch ERIC collects and processes your personal data through your use of all its platforms, including any data you may provide through the platforms when you sign up to our newsletter, use a service or communicate through LifeWatch platforms in any other form.

LifeWatch platforms are not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy policy together with any other privacy policy or fair processing policy we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy policy supplements other notices and privacy policies and is not intended to override them.

Controller

This privacy policy is issued on behalf LifeWatch ERIC and its Common Facilities, so when we mention "we", "us" or "our" in this privacy policy, we are referring to:

- **LifeWatch ERIC's Statutory Seat** and ICT e-Infrastructure Offices located in Plaza España SN, SECTOR II-III, 41013 Seville, Region of Andalusia, Kingdom of Spain.
- The **Service Centre**, located in Lecce, Puglia Region, Italy, and is hosted by the University of the Salento.
- The **Virtual Laboratories and Innovations Centre**, located in Amsterdam, the Netherlands and is hosted by the University of Amsterdam.

LifeWatch ERIC is the controller and responsible for all its platforms.

We have appointed a data privacy manager who is responsible for overseeing questions in relation to this privacy policy. If you have any questions about this privacy policy, please contact the data privacy manager using the details set out below.

Contact details

If you have any questions about this privacy policy or our privacy practices, please contact our data privacy manager in the following ways:

- Full name of legal entity: LifeWatch ERIC
- Email address: [gdpr\[at\]lifewatch.eu](mailto:gdpr[at]lifewatch.eu)
- Postal address: Plaza España SN, SECTOR II-III, 41013 Seville, Region of Andalusia, Kingdom of Spain

You have the right to make a complaint at any time to the Spanish Data Protection Agency (*Agencia Española de Protección de Datos*). We would, however, appreciate the chance to deal with your concerns before you approach the Agency so please contact us in the first instance.

Changes to the privacy policy and your duty to inform us of changes

We keep our privacy policy under regular review. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

Third-party links

Our platforms may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our platforms, we encourage you to read the privacy policy of every website you visit.

2. The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together as follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.

- **Contact Data** includes postal address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.
- **Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform, and other technology on the devices you use to access LifeWatch platforms.
- **Profile Data** includes your username and password, orders made by you, your interests, preferences, feedback and survey responses.
- **Usage Data** includes information about how you use our platforms, products and services.
- **Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data could be derived from your personal data but is not considered personal data in law as this data will **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific platform feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy policy.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health, and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

3. How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:

- apply for our products or services;
 - create an account on our platforms;
 - subscribe to our service or publications;
 - request information to be sent to you;
 - enter a competition, promotion or survey; or
 - give us feedback or contact us.
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- **Automated technologies or interactions.** As you interact with our platforms, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We may collect such personal data by using cookies, server logs and other similar technologies.
 - **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources.

4. How we use your personal data

We will only use your personal data when the law allows us to. We will use your personal data in accordance with the following legal basis:

- Where we need to perform a contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal obligation.

Generally, we do not rely on consent as a legal basis for processing your personal data although we will get your consent before sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

Purposes for which we will use your personal data

We have set out below the main uses of your data which depend on the nature of our relationship with you and how you interact with our platforms and our various services, and activities.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. We never sell your information and we will not pass your information on to a third party, except to partners that help us

provide these services.

Membership

We use the personal data you provide us with when registering you as a user for the purpose of servicing your membership. It is provided as legitimate interest. It includes, but is not limited to: administering your membership, ensuring the security of our platforms and services, and communicating with you about services: funding opportunities, research calls, LifeWatch training events, and system notifications. We will normally contact you via email, although we might occasionally need to send text messages, or call you.

Training courses, events and conferences

We use the personal data you provide as a delegate to events for the purpose of managing your attendance. It is provided as legitimate interest. Your data will be used to communicate with you throughout the process, including to confirm that we received your registration and payment, to clarify where we might need more detail to fulfil a booking, or to resolve any issues that might arise with your booking. We will retain your data to provide you, by email, with details of our future training courses, events and conferences. Should you at any time prefer us not to retain it for this purpose and ask us not to, we will delete your information.

Newsletter

We will send the LifeWatch ERIC newsletter by email several times per year and occasional communications with information about news and events in the wider LifeWatch community. It is provided as legitimate interest. You are free to change your subscription preferences at any time and remove consent for LifeWatch ERIC news and information emails. You may click 'unsubscribe' from the link which appears on all news emails footer and/or on Update profile, a personal link will be sent to your mail address allowing these actions. Should you at any time prefer us not to retain your personal information for this purpose and ask us not to, we will delete your information.

Applying for access, funding and visits

Any application made by submitting a proposal through our online portal may require additional personal data such as CV. Personal data will be kept private and only visible to relevant LifeWatch staff, those who will handle or review your proposal, or host your visit.

We use the personal data you provide for the purpose of reviewing your application, arranging the services, and to communicate with you throughout the process. It is provided as legitimate interest. We are required to maintain personal data for the

purposes of reporting to our funders, and to comply with EU and Spanish applicable law relating to financial recording.

According to any stated terms of submission, limited personal information (name, home country) of successful applicants may be published on the LifeWatch ERIC website, and may be shared with funders on request.

Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising. It is provided as legitimate interest.

You will receive marketing communications from us if you have requested information from us or ordered services from us or registered to our events and you have not opted out of receiving that marketing.

You can ask us or third parties to stop sending you marketing messages at any time.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Cookies

When you visit some pages on our platforms, your computer may be issued with a small file (a "cookie") for the purposes of managing and improving the services on the platform. The cookies that we use on our platforms do not contain any personally identifying information. You can set your browser to refuse all or some browser cookies, or to alert you when platforms set or access cookies. If you disable or refuse cookies, please note that some parts of the platforms may become inaccessible or not function properly.

5. Disclosures of your personal data

For the purposes set out above, we may share your personal data with:

- Other entities affiliated with LifeWatch ERIC.
- Service providers based within the EU and in the USA and India who provide IT and system administration services.
- Professional advisers, including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Tax regulators and other authorities who require reporting of processing activities in certain circumstances.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. International transfers

In general we do not transfer your personal data outside the European Economic Area (EEA). However, whenever we have to transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

Please contact us if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

7. Data security

We have put in place appropriate security measures to prevent your personal data from

being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We will notify you and any applicable regulator of a breach where we are legally required to do so.

8. Data retention

How long will you use my personal data for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances we will anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

9. Your legal rights

Under certain circumstances, you have rights under data protection laws in relation to your personal data. You have the right to:

Request access to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove

personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:

- If you want us to establish the data's accuracy.
- Where our use of the data is unlawful but you do not want us to erase it.
- Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims.
- You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us ([gdpr\[at\]lifewatch.eu](mailto:gdpr@lifewatch.eu)).

No fee usually required

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

10. Document Revision History

Revision	Reason for and description of change	Author	Date
1.	First issue	Lucas de Moncuit	03-05-2024
2.	Review the entire policy to be sure to include all LifeWatch platforms and not only the web portal.	Lucia Vaira	18-07-2024