



HERIFORGE

Cultural Heritage
and Immersive Technologies Forge



PROTECTION OF YOUR PERSONAL DATA

Processing operation: *Targeted consultation activities (including surveys, interviews and focus groups)*

Data Controller: *HERIFORGE Project Consortium*

1. Introduction

HERIFORGE Project Consortium (hereafter 'HPC') is committed to protect your personal data and to respect your privacy. HPC collects and further processes personal data pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights. The information in relation to the processing of personal data linked to targeted consultation activities organised by the services of HPC is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: HPC collects and processes your personal information within the framework of targeted consultation activities to obtain insights on the responsible use of extended reality (XR) technologies in cultural heritage. Your participation in this questionnaire contributes to mapping stakeholders, identifying opportunities, and addressing challenges in the implementation of XR technologies, as well as shaping strategies to promote their responsible use.

You are being contacted by HPC as your perspectives are considered relevant and necessary for informing the project's objectives. Your insights will help develop a network of three interconnected place-based ecosystems in Poland, Cyprus, and Türkiye, fostering an excellent R&I environment for innovation in the Cultural and Creative Industries (CCI).

The contact details of the prospective respondent have not been in the possession of the controller/processor and have been solely collected for this targeted consultation activity. We are reaching out to you via e-mail, project websites, and communication channels of partner institutions.

For reasons of transparency and openness, your responses may be published in the form of a summary report. HERIFORGE will only publish your identity if you provide explicit consent.

HERIFORGE service responsible may decide to:

- Require respondents to provide personal data in their responses due to the subject matter of the consultation;
- Use online survey tools for data collection;
- Store personal data in a secure document management system.

More specifically:

- The subject matter of the consultation activity offers you the possibility to provide personal data in your response that may identify you. These personal data will only be published subject to your explicit consent.
- If you choose confidentiality, it is your responsibility to avoid including references in your submission that would reveal your identity.
- The consultation activity may use HPC's online questionnaire tool, which requires you to log in via an authentication system. Certain personal data, such as name, surname, and email address, may be required.
- Your contribution to the targeted consultation will be stored securely in HPC's document management system.

3. On what legal ground(s) do we process your personal data

We process your personal data, because:

- (a) Processing is necessary for the performance of a task carried out in the public interest;
- (c) It is based on your consent, for one or more specified purposes:
 - **Publication of the identity of the stakeholder or respondent;**
 - **If the subject matter of a targeted consultation requires respondents to provide personal data in their response that make the data subject identifiable, their publication;**
 - To be contacted by HPC for the present or future consultations regarding Cultural Heritage.

4. Which personal data do we collect and further process?

In order to carry out this processing operation the following categories of personal data may be processed

- Name and surname;
- Profession;
- E-mail address of the respondent;
- Personal data included in the response or contribution to the targeted consultation activity, including (personal) opinions (if the targeted consultation at hand requires so).

Furthermore, you may spontaneously provide other, non-requested personal data in the context of your reply to the targeted consultation.

Please note that the Data Controller does not request nor expect that data subjects provide any



special categories of data under Article 9(1) of Regulation 2016/679 (that is “personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person’s sex life or sexual orientation”) related to themselves or to third persons in their contributions to the targeted consultation activity. Any spontaneous inclusion of these types of personal data is the responsibility of the data subject and by including any of these types of data the data subject is considered to provide his/her explicit consent to the processing.

5. How long do we keep your personal data?

The Data Controller retains your personal data only for the period necessary to achieve the purposes for which it was collected or further processed. Specifically, your data will be stored for a maximum of five years after the closure of the HERIFORGE project or until all related reporting and auditing obligations have been fulfilled, whichever is later.

A project is considered closed when all administrative, legal, and financial obligations associated with it have been completed. This retention period is based on best practices for research and innovation projects and aligns with applicable legal and regulatory requirements, including data protection regulations.

Following the expiration of the administrative retention period, personal data may be anonymized and retained for research and statistical purposes, provided that all identifying details are removed. Additionally, data related to project publications, reports, and publicly available materials may be archived for historical and academic reference.

If personal data is required for legal, regulatory, or audit purposes, it may be retained beyond the standard retention period until such obligations are met. After this period, all personal data will be securely deleted or anonymized to prevent identification of individuals.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of HPC (*or of its contractors (processors) if contractors are engaged to assist the controller*).

In order to protect your personal data, HPC has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to HPC partners responsible for carrying out this *processing operation* and to authorised partners’ staff according to the “need to know” principle, in particular to follow-up on the targeted consultation. Such staff abide by statutory, and when required, additional confidentiality agreements.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g.



Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Access to your personal data is provided to HPC's contractor responsible for carrying out the evaluation and to authorised staff according to the "need to know" principle. The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 12-23) of Regulation (EU) 2016/679, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Under certain conditions, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing and the right to data portability.

You have the right to object to the processing of your personal data on grounds relating to your particular situation.

Insofar you have consented to the certain processing of your personal data to the Data Controller for the present processing operation, you can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller. Your request as a data subject will be handled within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. In such case you will be informed of the extension of the time limit, together with the reasons for the delay.

9. Contact information

If you would like to exercise your rights under GDPR, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller at dataprotection@heriforge.eu.

