



PROTECTION OF YOUR PERSONAL DATA

This Data Protection Notice (DPN) provides information about the processing and the protection of your personal data.

Processing operation: Management of subscriptions to receive information

Data Controller: *HERIFORGE Project Consortium*

1. Introduction

The HERIFORGE Project Consortium (hereafter ‘the Consortium’) is committed to protecting your personal data and respecting your privacy. The Consortium collects and processes personal data pursuant to the applicable data protection laws, including the EU General Data Protection Regulation (GDPR) and relevant national laws.

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, as well as the Data Protection Officer and relevant supervisory authorities.

The information in relation to the processing operation ‘Management of participation in the HERIFORGE project activities and related communications’ is presented below.

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

The purpose of processing your personal data within the HERIFORGE project is to enable and enhance participation in project-related activities and communications. Specifically, your data may be processed for the following purposes:

- Facilitating stakeholder engagement and mapping relevant entities for collaboration.
- Identifying opportunities and challenges associated with the implementation of extended reality (XR) technologies in cultural heritage.
- Sharing strategic insights and best practices for the responsible use of XR in cultural heritage.
- Managing and organizing participation in open calls, workshops, co-design sessions, and training programs.
- Providing access to project-related publications, research reports, and other relevant materials.
- Distributing newsletters, including tailored updates and sector-specific insights related to the HERIFORGE project.

- Maintaining direct communication with participants through newsletters, emails, and official notifications.
- Informing participants about upcoming events, initiatives, and thematic discussions relevant to the HERIFORGE project and its objectives.
- Gathering feedback from stakeholders to enhance project implementation and impact assessment.
- Ensuring compliance with legal and regulatory requirements in the context of the project.
- Sending periodic newsletters to inform participants about project developments, funding opportunities, research findings, and industry trends relevant to the HERIFORGE project.
- Engaging with stakeholders through newsletters and other direct communication channels to foster collaboration and knowledge exchange.

Your personal data will not be used for automated decision-making, including profiling.

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

The Consortium processes your personal data based on the following legal grounds, in accordance with Article 6(1) of the GDPR:

- **Consent (Article 6(1)(a) GDPR):** Your personal data is processed based on your explicit and informed consent, which you provide when subscribing to HERIFORGE project communications, newsletters, and participation in related activities. You have the right to withdraw your consent at any time without affecting the lawfulness of processing prior to withdrawal.
- **Performance of a Contract (Article 6(1)(b) GDPR):** If your participation in specific HERIFORGE activities involves contractual engagements, such as funding agreements or research collaborations, personal data processing may be necessary for the performance of such contractual obligations.
- **Legal Obligation (Article 6(1)(c) GDPR):** In cases where the Consortium is required to comply with legal and regulatory obligations under EU or national law, certain personal data may be processed to fulfill these obligations, including financial reporting, audit requirements, and data retention mandates.
- **Legitimate Interests (Article 6(1)(f) GDPR):** The processing of certain personal data may be necessary for the legitimate interests pursued by the Consortium or third parties, provided that such interests are not overridden by your fundamental rights and freedoms. This includes maintaining security measures, conducting statistical research, and improving project outreach and stakeholder engagement.

4. Which data do we collect and further process?

In order to carry out these processing operations, the Controller collects the following categories of personal data:

- Email address, name and surname are needed to ensure the delivery of the service to you as subscriber.

The following personal data is needed for providing you with a more personalised experience (*i.e. better targeting the content of the information*) and for generating anonymised statistics



- Title;
- Function;
- Country of residence;
- Sector of activity;
- Profession.

5. How long do we keep your personal data?

The Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely until you unsubscribe from the mailing list.

Depending on the technical solutions available, you can either write to the dedicated functional mailbox and ask to be unsubscribed from the mailing list or follow the unsubscribe link in the information email you have received. Appropriate action shall be taken within a week of receiving the request.

In case where data is kept for statistical purposes, some subscriber's optional data may be kept for 5 years after the un-subscription, providing these do not allow to identify the subscriber any more and that these are available to a very restricted number of authorised persons performing the processing operation on a need to know basis, for the sole purposes of generating anonymised statistics.

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

All personal data in electronic format are stored on secure servers managed by the HERIFORGE Project Consortium and, if necessary, by trusted service providers under contractual agreements ensuring compliance with data protection regulations.

To protect your personal data, the Consortium has implemented technical and organizational measures, including access control mechanisms, encryption, and security policies to prevent unauthorized access, data alteration, or loss.

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

Access to your personal data is provided only to authorized staff within the HERIFORGE Project Consortium and, where necessary, project partners and subcontractors engaged in the project activities, following the 'need-to-know' principle.

We do not share your personal data with third parties, except when required by law or upon your explicit consent.



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.

