

## **PRIVACY & DATA PROTECTION POLICY**

We take your privacy seriously and want to be transparent with our processing of your personal data. We therefore have a policy setting out how your personal data will be processed and protected during your navigation and use of this application. We respect your privacy rights and recognize the importance of protecting the information collected about you. Whenever you give us your personal information we will use it in accordance with General Data Protection Regulation (GDPR) and applicable privacy laws and for the purposes set out in this policy, and in any relevant terms and conditions.

By using this application, users acknowledge that they have read, understood, and unconditionally accepted this Privacy Policy.

### **Who is collecting your personal data?**

**CENTRE FOR RESEARCH AND TECHNOLOGY HELLAS (CERTH) / HELLENIC INSTITUTE of TRANSPORT**

6<sup>th</sup> Km Charilaou - Thermi Road

57001, Thessaloniki, Greece

In the following terms you will find important information regarding the type, purpose of personal data processing, the data protection, and your rights as data subjects.

### **How and why do we use your personal data?**

Your personal data are collected and processed for the purposes of the ODOS 2020 project. This project aims to introduce an innovative technological solution, which through the use of the Network of Things ("Internet of Things" - IoT) and infrastructure - vehicle communication technologies, will implement collaborative applications in the field of Intelligent Transport Systems (C-ITS) without substantial and costly interventions on the road. The complete technological solution that will emerge as a product of the ODOS 2020 project and will require minimal to zero equipment additions on behalf of the vehicles. Within this framework, 4 types of applications (3 for drivers and 1 for the road operators) have been integrated within the provided app, which uses the location and id of the vehicle to provide customised static and dynamic safety information along with environmental conditions.

### **What personal data do we collect?**

The data processing is limited to personal data that is necessary and appropriate for the fulfillment of the ODOS 2020 project's purposes and operations of the application. To this end, we collect only your location data. Specifically, the application stores information containing location data together with some data entered by the user (not personal data and not unique for each user), after a proper action from the user, i.e. by pressing of a button.

#### **What is the lawful basis for processing your data?**

One of the main data protection principles is the lawfulness of personal data processing. By registering and using the application the user gives consent to store and process the required personal data by CERTH/HIT (article 6 [1a] GDPR) for the provision of the described services. You have the right to withdraw your consent at any time, by unsubscribing from the application. By that, the consent is automatically removed and no personal data will any longer be stored or processed by CERTH/HIT.

#### **How long do we save your data?**

Your personal data is kept only for the reasonable period of time required by the nature of the processing and only for as long as it is required to achieve the above purposes of processing unless a longer retention period is required by law or for the establishment, exercise or defense of legal claims. For this reason, we save the data temporarily, i.e. for as long as the user uses the application.

#### **Who has access to your personal data?**

Collected personal data may be disclosed to third parties, if this is required for the fulfillment of our legal obligations or is necessary for the fulfillment of the above data processing purposes, in compliance with the applicable legal framework. Such disclosure could be made to involved banking institutions for carrying out your payments, the road operators, official government and supervising bodies, public authorities, and organizations, courts and CERTH/HIT's partners, such as natural or legal persons who have undertaken the execution of certain services and functions of the application on behalf of CERTH/HIT (data processors). The processing of the personal data by the data processors is made under the explicit instructions of CERTH/HIT and after it is contractually guaranteed that all the necessary technical and organizational measures have been implemented.

CERTH/HIT will never transfer, sell, rent or exchange your personal data to third parties for marketing purposes.

### **Do we transfer your data outside the European Union?**

It is highlighted that CERTH/HIT does not transfer your personal data outside the European Union (EU) or the European Economic Area (EEA).

### **How do we protect your data?**

We implement appropriate technical and organisational measures to ensure that your personal data are always safe and secure. Our security measures include encryption of data, regular cyber security assessments of all service providers who may handle your personal data, security controls that protect our entire IT infrastructure from external attack and unauthorised access, and internal policies setting out our data security approach and training for employees.

### **What are your rights?**

- **Right to access:** You have every right to request information about the personal data we hold on you at any time. You can contact us and we are willing to provide you with your personal data via email.
- **Right to rectification:** You have the right to request rectification of your personal data if they are incorrect.
- **Right to erasure (“right to be forgotten”):** You have the right to erase any personal data processed by us at any time.
- **Right to restriction of processing:** You have the right to obtain from us restriction of processing where you have a particular reason for wanting the restriction (if you object to our legitimate interest, or if your personal data is incorrect, or if you think that the processing is unlawful, or if we no longer need them).
- **Right to portability:** you have the right to get a copy of your data in a structured, commonly used and machine-readable format transferred to you or to another party. This only includes the personal data you have submitted to us.
- **Right to object to processing:** You have the right to object to the processing of your personal data. We will not continue to process the personal data unless we can demonstrate legitimate grounds for the process which overrides your interest and rights or due to legal claims.

- **Right to withdraw your consent:** You have the right to withdraw your consent at any time. After this withdrawal, we will stop processing your data. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

- **Right to lodge a complaint:** You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work, or place of the alleged infringement if you consider that the processing of your personal data infringes the data protection framework.

Please note that the aforementioned rights may be restricted in the light of the GDPR or other applicable data protection legislation

### **Change of this Policy**

The current policy is likely to change, without any notice, whenever it is required and in compliance with applicable national and European laws. For this reason, you should check it on a regular basis. By using CERTH/HIT's application, users acknowledge that they have read, understood, and unconditionally accepted this Privacy Policy.

### **Contact Information**

For any questions that may arise regarding this policy or if you want to exercise your rights regarding your personal data, please e-mail us at: [hit@certh.gr](mailto:hit@certh.gr).