

Privacy policy on eTDR

This document covers the privacy policy for the users of the eTDR (European Trusted Digital Repository) service as described hereafter and is valid for all the customers, if no other agreements are in place. It has been written in order to allow understanding CINES policy regarding privacy, as well as how personal information will be handled when using the service. This Privacy Policy will also provide information so that users are able to consent to the processing of personal data in an explicit and informed manner, where appropriate.

In general, any information and data which provided to CINES over the eTDR service, or which is otherwise gathered or produced by CINES, in the context of the use of eTDR services (“Services”) as better defined in Section 3 below, will be processed by CINES in a lawful, fair and transparent manner. To this end, and as further described below, CINES takes into consideration internationally recognised principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimisation, data quality and confidentiality.

This Privacy Policy is valid from January, 1st 2020.

(DATACONTROLLER =) The CINES, with registered offices in Campus Saint-Priest, 950 Rue de Saint-Priest, 34097 Montpellier cedex 5, France, is committed to protecting the online privacy of the users of this eTDR service (“eTDR”).



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Data controller

CINES, as identified at the top of this Privacy Policy, is the data controller regarding all personal data processing carried out through the eTDR service. You can contact CINES with any questions related to this Privacy Policy or the CINES personal data processing practices by sending a written communication to the Data Protection Officer : dpo@cines.fr, or via the contact forms available on the CINES website.

Personal data processed

When you use the Service, CINES will collect and process information regarding you (as an individual) which allows you to be identified either by itself, or together with other information which has been collected. CINES may also be able to collect and process information regarding other persons in this same manner, if you choose to provide it to CINES.

This information may be classified as “Personal Data” and can be collected by CINES both when you choose to provide it or simply by analysing your behaviour on the Service.

Personal Data which can be processed by CINES through the Service are as follows:

Name, contact details and other Personal Data

In order to create an account for the Service, you will be asked to submit information about yourself, such as your name, professional title, organisation name/type, primary (and secondary) domain of work/expertise, e-mail address, city/country of residence, address, and gender. Mandatory fields will be marked as such in the registration forms – it is not possible to process your registration if any of the mandatory fields are left incomplete.

In addition, whenever you communicate with CINES by submitting a general enquiry or a support ticket, CINES may collect additional information which you choose to provide.

Purposes of processing

CINES intends to use your Personal Data, collected through the Service, for the following purposes:

1. To create a profile of you as a Service user, which will be used to give you access to the Service (“Service Provision”);
2. For compliance with laws which impose upon CINES the collection and/or further processing of certain kinds of Personal Data (“Compliance”);
3. For development and administration of the Service, in particular by use of data analytics regarding how you and other users make use of the Service, as well as the information and feedback you provide, to improve our offerings (“Analytics”);
4. To prevent and detect any misuse of the Service, or any fraudulent activities carried out through the Service, including by carrying out internal audits (“Misuse/Fraud”).

Grounds for processing and mandatory / discretionary nature of processing

CINES legal bases to process your Personal Data, according to the purposes identified in Section 3, are as follows:

1. **Service Provision:** processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you – Art. 6(1)(b) GDPR. It is not mandatory for you to give CINES your Personal Data for these purposes; however, if you do not, CINES will not be able to provide any Services to you.
2. **Compliance:** processing for this purpose is necessary for CINES to comply with its legal obligations – Art. 6(1)(c) GDPR. When you provide any Personal Data to CINES, CINES must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.
3. **Analytics:** Information collected for this purpose is used to allow CINES to understand how users interact with the Service and to improve it accordingly, with the aim to providing a better user experience – Art. 6(1)(f) GDPR.
4. **Misuse/Fraud:** Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Service (for potentially criminal purposes) – Art. 6(1)(f) GDPR.

Retention of personal data

Personal Data processed for Service Provision will be kept by CINES for the period deemed strictly necessary to fulfil such purposes – in any case, as these Personal Data are processed for the provision of the Services, CINES may continue to store this Personal Data for a longer period, as may be necessary to protect CINES interests related to potential liability related to the provision of the Services.

Personal Data processed for Compliance will be kept by CINES for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for preventing Misuse/Fraud will be kept by CINES for as long as deemed strictly necessary to fulfil the purposes for which it was collected.

More information on applicable retention periods is available upon written request to the Data Protection Officer at the following address: dpo@cines.fr.

Data subjects' rights

As a data subject, you are entitled to exercise the following rights before CINES, at any time:

1. Access your Personal Data being processed by CINES (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data;
2. Correct or update your Personal Data processed by CINES, where it may be inaccurate or incomplete;
3. Request erasure of your Personal Data being processed by CINES, where you feel that the processing is unnecessary or otherwise unlawful;

4. Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
5. Exercise your right to portability: the right to obtain a copy of your Personal Data provided to CINES, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller;
6. Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent CINES from processing your Personal Data.

Please note that most of the Personal Data you provide to CINES can be changed at any time, you can always exercise your rights described above by sending a written request to the Data Protection Officer at the following address: dpo@cines.fr.

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Service is unlawful.

Amendments

CINES reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g. as a result of changes in applicable law. You will be informed of such changes as soon as they are introduced, and they will be binding as soon as they are published on the CINES website. Therefore, you are invited to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how CINES collects and uses Personal Data.

Document control

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