

## 1. Data Protection Policy

### 1.1. Information on the processing of personal data in accordance with the General Data Protection Regulation (EU/679/2016)

This is a joint data protection policy statement (hereinafter “Data Protection Policy”) by:

Tehnopol Science and Business Park, with registered office in Teaduspargi 6/1, 12618, Tallinn (EE).

EIT Health Scandinavian Regional Innovation Hub, with registered office in Torsgatan 11, 111 23 Stockholm (SE).

Galician Health Cluster, with registered office in Avenida de Fernando de Casas Novoa 37 Edificio CNL. Portal A-B. 1º andar, 15707 Santiago de Compostela, Coruña (ES).

Civitta Estonia AS, with registered office in Riia 24a, 51010 Tartu (EE).

European Regional and Local Health Authorities, with registered office in Rond-point Robert Schuman, 11, 1040 Etterbeek, Bruxelles (BE).

Foundation Praxis Centre for Policy Studies, with registered office in Ahtri 6A, B entrance, 6<sup>th</sup> floor, 10151 Tallinn (EE).

Proud Engineers OÜ, with registered office in Kristjani tee 2, Miiduranna village, Viimsi, Harjumaa 74015 (EE).

South-Eastern Finland University of Applied Sciences, with registered office in Paraatikenttä 7, 45100 Kouvola (FI).

University of Porto, with registered office in Praça de Gomes Teixeira, 4099-002 Porto (PT)

acting as Joint Data Controllers (hereinafter “Controllers”) of your personal data pursuant to Article 26 of the General Data Protection Regulation (hereinafter “GDPR”).

This Data Protection Policy confirms that we jointly determine the purposes and means of processing of Your personal data relating to the action entitled Innovation Networks for Active and Healthy Ageing (hereinafter “IN-4-AHA”) financed under the Horizon 2020 Programme for research and innovation under Grant Agreement number 101017603.

The Controllers herein provide information on the processing of personal data of all the stakeholders who take part in the project IN-4-AHA. The present Data Protection Policy also informs You of the essence of the arrangement between the Controllers and provides you with transparency as to how we will process your personal data for the purposes described



herein. This Data Protection Policy supplements any other privacy notices each of us may separately issue or may have separately issued in the past to You.

The processing of personal data is based on principles of correctness, lawfulness, transparency, accountability, accuracy, integrity, confidentiality, purpose limitation, storage limitation, and data minimisation. Personal data are collected for specific, explicit and legitimate purposes and are also adequate, relevant and limited to what is necessary with respect to the purpose for which they are collected and processed.

Personal data will be updated on request in accordance with the purposes for which they are processed and they will be stored in such a way as to allow identification of data subjects for a period of time (3 years) not exceeding the achievement of the purposes for which the data are processed and in such a way as to guarantee adequate security.

**1.2. Contact details of the Data Protection Officer.** Please note that the Controllers have designated, pursuant to art. 37 of the Regulation the person responsible for the protection of personal data (Data Protection Officer - "DPO") who can be contacted through the following channels: Kristiina-Maria Ploom, Tehnopol Science and Business Park, Teaduspargi 6/1, 12618, TALLINN (EE) - [in4aha@tehnopol.ee](mailto:in4aha@tehnopol.ee). In case of testing activities of the project, the data subjects can contact the DPOs of the testing beds via: [opencalls.in4aha@tehnopol.ee](mailto:opencalls.in4aha@tehnopol.ee). The DPO of the project and the DPOs of the testing beds will work closely together throughout the project to ensure the protection of personal data.

**1.3. Type of data processed.** The following data categories that you provided will be processed: name, surname, e-mail address, affiliation (name of company/organisation), position at the company/organisation, representative group affiliation. In case of testing activities, we will also process the participants' gender and age to be able, if needed, to refer to the participants in the reports.

**1.4. Purpose and legal basis of the processing.** The personal data You provide – as identified or identifiable individual – are processed by the Controllers for the purpose of complying with their contractual obligations deriving or connected to IN-4-AHA. Only such data will be processed for which You have given consent. In case consent has been granted to the Controllers, processing of data is necessary to fulfil IN-4-AHA project's contractual obligations. The aim of the IN-4-AHA project is to come up with a scale-up model of innovation for large-scale deployment of innovative solutions for active and healthy ageing. For this purpose, the project will bring together both the supply (start-ups, SME-s, innovation/research groups, etc.) and the demand side (health care institutions, health centers, local governments, user associations, caregivers, etc.) to identify and support the main innovation ecosystem elements as well as address the barriers for innovators in their market uptake, and in the expansion in both the domestic market and cross-border markets. In order to do that, several activities related to cocreating, testing, validating and implementing innovative solutions in health and care will take place for which personal data will be collected and utilized. Personal data will be collected and utilized also for the purpose of engaging with the community, e.g. invite different stakeholders to project activities.



**1.5. Mandatory or voluntary communication of data and possible consequences of a failure to provide it.** Concerning the purposes referred to in the previous point, there is no obligation to provide data, but if it is not provided, engagement with various stakeholders is not possible. The provision of personal data is voluntary, and the processing will take place only with your consent as a data subject. There will be a minimum number of participants selected for testing activities to minimise the risk of the possibility of withdrawal of some of the participants and to guarantee the execution of the predicted tests and the collection of results.

**1.6. Processing methods, automated decision-making processes and data retention times.** The processing of your personal data is carried out by means of information technologies, although potential processing in paper form is not excluded. Personal data are processed using appropriate measures to guarantee confidentiality, prevent loss, illicit and incorrect use and prevent access by unauthorized third parties. No automated decision-making processes are used to process your personal data. Your personal data, collected either through a registration form or through an informed consent form, will be stored for 3 years to fulfil the purposes listed above, except for any optional express consent granted separately. After 3 years the personal data will be deleted from the databases. The Controllers will comply with any legislation requiring longer retention time. In case the next consortium wishes to process data collected on the stakeholders' list through registration forms, the new data processors will need to ask for consent.

**1.7. Communication, location of servers, dissemination and transfer of data to third countries or international organizations.** Should it be necessary, personal data might be communicated to the European Commission and the third party responsible for audit procedures of the project reports. Your personal data will be stored either in the internal servers of the lead partner of the project (Tehnopol) or in Microsoft Teams program, which we use especially for IN-4-AHA project documentation and to which only the Controllers have access to. Both servers comply with the GDPR requirements, guaranteeing safe retention of personal data. Your personal data will not be transferred to third countries or international organizations outside the EU.

**1.8 Protection of data.** To protect your data, the Controllers have put in place some technical and organisational measures. Technical measures include actions to address online security, risk of data loss or unauthorised access. Organisational measures include restricting access to personal data only to authorised parties who have a legitimate reason to have access to it.

**1.9. Rights of the data subjects and complaint to the Data Protection Authority.** You may at any time exercise the specific rights of a data subject under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, such as:

1. obtaining confirmation as to whether or not personal data concerning You is being processed;
2. obtaining access to your personal data and to the information set out in Article 15 of the Regulation;
3. obtaining the rectification of the inaccurate personal data that concern You without undue delay or the supplementing of incomplete personal data;



4. obtaining the erasure of the personal data that concern You without undue delay;
5. obtaining the restriction of processing the personal data that concern You;
6. being informed of any rectifications or erasures or restrictions of processing in relation to the personal data that concern You;
7. receiving in a structured, commonly used and machine-readable format the personal data that concern You;
8. objecting at any time, on grounds associated with your specific situation, to the processing of the personal data that concern you;
9. the above is without prejudice to your right to withdraw at any time whatsoever consent to data processing You might have granted.

To exercise the rights provided by the law, including the withdrawal of your consent at any time, You can contact the DPO by email at [in4aha@tehnopol.ee](mailto:in4aha@tehnopol.ee). The withdrawal will not affect the lawfulness of the processing carried out before the withdrawal of your consent. Should You consider that processing of your data by the Controllers infringes the GDPR and your rights under Regulation (EU) 2018/1725, You may also address the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu)).

