

CLARIN:EL Privacy Policy

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Privacy Notice

CLARIN:EL is the Greek partner of <u>CLARIN ERIC</u>, which is a Research Infrastructure that provides easy and sustainable access to **digital language data** (in written, spoken or multimodal form) for the research community in the **social sciences** and **humanities domain** and to the broad public, **offering at the same time advanced tools** to discover, explore, exploit, annotate, analyze or combine such data sets, stored in the repositories of the network. This Privacy Notice describes how CLARIN:EL collects and uses your personal data when you visit our website and use our services through our platform and the measures we take to ensure your data remains protected and secure.

We encourage you to read this Privacy Notice carefully when using CLARIN:EL Infrastructure.

We do not knowingly attempt to solicit or receive information from children.

Data protection Officer

CLARIN:EL has appointed an external data protection officer for you to contact if you have any questions or concerns about CLARIN:EL's personal data policies or practices. You can contact our data protection officer at:

• legal-helpdesk@clarin.gr



Keeping your data secure

Your privacy matters to us. We take all the necessary steps to ensure that your data is secure and protected and that we use it only for specific and transparent purposes.

The term "personal information or personal data" in this Notice refers to information that identifies or is capable of identifying you as an individual. The use of information collected through our Infrastructure shall be limited to the purpose of providing the service for which you have engaged us.

We only offer services that are hosted within the European Union.

Collecting your data

What we collect

Generally, we process different types of personal data, only for the below mentioned reasons:

- a. In order for you to register to our services as a single user or an Organisation/Company: we collect a desired account name (which can be personal data or other information e.g. nickname), first name, last name, email, and password. In order to create this account you need to read, understand and agree to our <u>Terms of Service</u> for registered users.
 - In case you are a student, academic or researcher you can use your academic credentials to register to our services by clicking on the button academic signup.
 - In case a research or academic institution requires to join our network, we collect the first name, last name, position, contact details (email and phone number) of the institution's legal representative who will act as contact person.

When we handle your requests for registration we also collect log files and traffic data, in order to process and respond to your requests.



- b. In order for you to search and browse the CLARIN:EL Central Inventory (Central Catalog): once registered as a user and signed-in using your username and password, you can search the inventory in order to find language resources (datasets, tools or services). During this process we collect your first name, last name, email address, affiliation, username, password, date of birth and metadata of your academic activity and log files. We may also collect the search filters that you select to narrow down your search.
- c. In order for you to create and upload language resources to the Infrastructure: once registered as a user and signed-in using your username and password, you can create and upload language resources. During this process we collect your first name, last name, email address, affiliation, username, password, date of birth and metadata of your academic activity and log files. We may also collect the search filters that you select to narrow down your search.
- d. In order for you to contribute to the enrichment of the language resources: each user can upload a resource or participate in an editors' group that uploads or documents the language resources. We collect: first name, last name, email address, affiliation, username, password, date of birth and metadata of your uploading activity (traffic data, time of upload, date, type of amendment, category, etc.)
- e. In order to download and/or process language resources, each user can select a language resource to download or to process with one of the available tools/services. We collect: first name, last name, email address, affiliation, username, password, date of birth and metadata of your activity (time of activity, date, type of amendment, category, etc.)
- f. Our website collects certain information automatically and stores it in log files in order to better design the services that suit our users' needs. The information may include internet protocol (IP) addresses, the region or location where your computer or device is accessing the internet, the type of your browser, your operating system and other usage information about the use of our website, including a history of the pages you view. We may also use your IP address to help diagnose problems with our server and to administer our website, analyze trends, track visitor movements, and gather



broad demographic information that assists us in identifying our visitors' preferences.

- **g.** It is possible to collect personal data not directly by the data subjects themselves but indirectly as:
 - metadata in the description of language resources (e.g. owner/creator of a language resource);
 - personal data on people mentioned in the language resources.

Such data could be contact details, personal information (first name, last name etc.), biometric information, behavioral data, special categories of personal data (such as religion, origin etc.), criminal convictions etc. and minors' personal data. We cannot control or block the uploading of personal data. However, in many cases we take all the necessary steps to ensure that personal information is removed from our platform, especially when the data subject is a child.

We may also collect information about your activities offline, in case you attend an event organised by the CLARIN:EL Infrastructure, respond to our surveys or contact us via email.

Purposes for processing your data

As explained above, we process your data to provide you with assistance when registering to our services. We use this information to authorize your contributions to the Infrastructure, enhance accuracy in searching results and data analytics and better tailor our services to your needs. We can also use your data to communicate with you about troubleshooting, providing support and answering to your questions. We can also use your metadata and traffic data to enhance our services, evaluate our efficiency and develop better services in the future.

Some personal information is necessary to us so that we can supply you with the services you have requested, and to verify your identity so that we know it is you and not someone else. This is relevant when you submit a request.



We collect information through cookies

When you use our website, we use cookies to collect information about your settings and preferences so that these can be used each time you visit our website. We also collect information that is not specific to your identity such as anonymized information collected automatically through cookies, e.g. your language preferences. You can manage cookies by checking the available options.

Linked services, third party sites and content

Our website may, from time to time, contain links to other websites which are outside of our control and are not covered by this Policy. We do not accept any responsibility or liability for other sites' privacy policies. If you access other websites using the links provided, please check their policies before submitting any personal information.

How long we keep your personal data

We will retain your information for as long as necessary for the uses set out in this Notice or while there is a legitimate reason for doing so. If you ask us to delete your information before this time, we may not be able to do so for technical, legal, regulatory or contractual constraints. Your information will be retained in order to comply with legal and regulatory obligations as well as for analysis, to prevent fraud, collect any monies owed, and to resolve disputes.

More specifically,

- a. The first time you directly supply personal information, in order to register in our services as a user we create a record (status of registration) of your data and store that record in our internal systems. The records we store will be used to enable us to provide our services to you.
- b. The information collected automatically through cookies, log files and the metadata that are stored in our log files (e.g. most viewed resources, top queries, latest queries, top downloaded resources, latest updated resources, time of log-in, upload etc.) may be retained for a specific period of time



- according to the capacity and the volume of data stored. When there is no storage space the files are deleted automatically.
- c. When a user uploads language resources the metadata are retained for an unlimited period of time. The language resources are stored in our platform until permanently deleted due to force majeure (e.g. breach of Intellectual Property Rights). The repository manager and the infrastructure administrator can delete any resource for any reason.

We do not keep your data for any longer than necessary to fulfil the purposes for which we collected the data or the purposes for which data are reused.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data stored on our servers upon request: you may request a copy of your personal information which we may hold about you by getting in touch with us using the contact details below. You may also ask us to correct any inaccuracies in your personal information. This right may be restricted by law where disclosing information may result in the personal information of other individuals being disclosed and it would be unreasonable to do so.
- require CLARIN:EL to change incorrect or incomplete data;
- require CLARIN:EL to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data. This applies in the event CLARIN:EL is relying on its legitimate interests as the legal ground for processing.

The information collected automatically through cookies and log files is stored on our server. You can manage cookies by checking the available options. If you would like to exercise any of these rights, please contact legal-helpdesk@clarin.gr.

We will carefully consider your request as there may be circumstances which require us to, or allow us to, continue processing your data.



If you believe that CLARIN:EL has not complied with your data protection rights, you can file a complaint to the <u>Greek Data Protection Authority</u>.

Disclosure of your personal data

In some cases, we may be required to disclose your personal information to comply with legal requirements and requests from government agencies, if required for the purposes set out above, if mandated by law or if required for the legal protection of our legitimate interests in compliance with applicable laws.

Your information will only be shared and used in accordance with this Policy and where an agreement is in place to ensure that your information is protected. We will not sell your personal information without your consent or share it with other organisations for their own marketing purposes.

We may also disclose your personal information to the institutions and national bodies that we collaborate with in order to provide the services to you, develop our services and evaluate their efficiency.

We share the following information with the following parties:

- The Greek Research and Technology Network (GRNET S.A.), which is a public body that authenticates and certifies the academic users of our platform. It is also the national provider of the cloud infrastructure for CLARIN:EL. The electronic records (language resources, metadata descriptions and user data) as well as the back up files are stored in dedicated servers at the Greek Research and Technology Network (GRNET S.A.) or at the Athena Research and Innovation Centre.
- For users' authentication purposes and for the participation in the CLARIN:EL Infrastructure, access to the stored user data records (username and password only) have the following Universities and Research Institutions: ATHENA Research Center, Greek Research and Technology Network (GRNET S.A.), National Center for Scientific Research Demokritos, University of Athens, Aristotle University of Thessaloniki, Ionian University, University of



the Aegean, Panteion University, Centre for the Greek Language, and National Center for Social Research.

Overseas Transfers of Your Personal Data

Your personal data will not be transferred to countries outside the EU.

In case we may need for some reason to transfer such data, we will only transfer such data in countries that satisfy the adequate or comparable levels of protection in order to protect personal data held in that jurisdiction, and (where we are required to do so) with your consent.

In case personal data is transferred from the EU to outside the EU, we use Model Clauses, ensuring that such data transfers are compliant with applicable privacy legislation. In relation to any transfer to a third party in a country that is not subject to an adequacy decision by the EU Commission, such transfer will be appropriately protected through mechanisms such as EU Commission approved standard contractual clauses, an appropriate Privacy Shield certification or Binding Corporate Rules. A copy of the relevant mechanism can be provided for your review upon request.

Delivering and improving our services

When you participate in an event (networking, knowledge dissemination etc.) we organize or host, we will share your first name, last name and sometimes your email address and other non-personal information with the other attendees at that event. Additionally and solely upon prior notice and consent we may upload related videos on our social media accounts.

From time to time we may make changes to this Notice. This might be in relation to changes in the law, best practice, changes to the services we provide or collection and use of your personal information. We will always display clearly when the Notice was last updated and, where appropriate, notify you of any relevant changes.



We use your contact details to send you information about the operation of our services, or changes to our policies, terms and conditions.

Updates

This page was last updated in May 2019. If you have any questions for us or suggestions on how to improve the information on this page, please contact <u>legal-helpdesk@clarin.gr</u>.