

Privacy Policy for the AQUAEXCEL3.0 project

1. Data Protection Officers and responsibilities

In line with the GDPR, each AQUAEXCEL3.0 partner has appointed a DPO or contact person responsible for management of personal data. Apart from DPOs or contact persons for each organisation, AQUAEXCEL3.0 has appointed Marc VANDEPUTTE (coordinator) as the main contact for the consortium. This person can be contacted by partners, but also other people who have submitted personal data because they have subscribed for AQUAEXCEL3.0 transnational access, communication and dissemination activities, to obtain answers to questions, to prepare protocols or resolve matters related to data breaches.

INRAE is a public institution with a scientific and technical vocation. Its legal address is 147 rue de l'Université, 75007 PARIS, France (SIRET 180 070 039 01803). For the purpose of personal data treatment in the AQUAEXCEL3.0 project, financed by the European Union H2020 Framework Programme under Grant Agreement 871108, INRAE is represented by Mrs Mathilde DUPONT-NIVET, Head of the Animal Genetics and Integrative Biology Unit, and the day to day management of issues relative to personal data in the project will be undertaken by the Coordinator Mr Marc Vandeputte (marc.vandeputte@inrae.fr)

The collection and treatment of personal data by INRAE in the frame of the AQUAEXCEL3.0 project will conform to European regulation 2016/679 on data protection (GDPR) and the French law "informatique et libertés" from January 6, 1978.

In addition to this, all partners of the AQUAEXCEL3.0 consortium have appointed a DPO (data protection officer) or a contact person for the management of the personal data under their responsibility.

Partner	DPO or data contact
1- INSTITUT NATIONAL DE RECHERCHE POUR L'AGRICULTURE, L'ALIMENTATION ET L'ENVIRONNEMENT (INRAE)	cil-dpo@inra.fr , with routine tasks and responsibilities fully delegated to Marc VANDEPUTTE, marc.vandeputte@inrae.fr
2- HAVFORSKNINGSINSTITUTTET (IMR)	Terje Digranes. terje.digranes@hi.no , phone: +47 419 04 859.
3- THE UNIVERSITY OF STIRLING (UoS)	Data.protection@stir.ac.uk , with routine tasks and responsibilities fully delegated to Gazelle Bucholtz, gazelle.buchholtz@stir.ac.uk
4- AGENCIA ESTATAL CONSEJO SUPERIOR DE INVESTIGACIONES CIENTIFICAS, M.P. (CSIC)	The DPO for CSIC is Josep Calduch Giner, j.calduch@csic.es
5- HELLENIC CENTRE FOR MARINE RESEARCH (HCMR)	Mr. D. Tokanis dpo@hcmr.gr (with cc: to stavros@hcmr.gr)
6- NEMZETIAGRARKUTATASI ES INNOVACIOS KOZPONT (NAIK)	Uros Ljubobratovic, Ljubobratovic.Uros@uni-mate.hu
7- INSTITUT FRANCAIS DE RECHERCHE POUR L'EXPLOITATION DE LA MER (Ifremer)	dpo@ifremer.fr
8- NOFIMA AS (Nofima)	Mia Bencze Rørå Mia.Rora@Nofima.no is Nofima DPO (cc asa.espmark@nofima.no in all correspondance)
9- JIHOESKA UNIVERZITA V CESKYCH BUDEJOVICICH – JU - UNIVERSITY OF SOUTH BOHEMIA IN CESKE BUDEJOVICE (JU)	Monika Malkusova mmalkusova@frov.jcu.cz is the main contact person for any data related issues and our data protection representative
10- NORGE TEKNISK – NATURVITENSKAPELIGE UNIVERSITET NTNU (NTNU)	Thomas Hegelsen thomas.helgesen@ntnu.no

11- SINTEF OCEAN AS – SO (SINTEF)	SINTEF's privacy representative, Lasse Andre Raa Phone: (+47) 55 58 20 59. Special notification to the privacy representative can be made through SINTEF's own e-mail account privacy@sintef.no
12- UNIVERSIDAD DE LAS PALMAS DE GRAN CANARIA (ULPGC)	Data Protection Officer : Noemi Rey Yébenes, dpd@ulpgc.es , with routine tasks and responsibilities fully delegated to Rafael Ginés, rafael.gines@ulpgc.es
13- WAGENINGEN UNIVERSITY, DEPARTMENT OF ANIMAL SCIENCES (WU)	Roel Maas (roel.maas@wur.nl) is the main contact person for any data related issues and our data protection representative
14- STICHTING WAGENINGEN RESEARCH (WR)	
15- ERINN Innovation (ERINN)	Cliona Ní Cheallachain (cliona@erinn.eu) is the main contact person for any data related issues and our data protection representative. (cc. dataprotection@erinn.eu and jane@erinn.eu in all correspondence)
16- INRAE TRANSFERT SAS (IT)	Sylvia Lubin- sylvia.lubin@inrae.fr
17- UNIVERSITE DE LORRAINE (UL)	Jean-Daniel Durand - jean-daniel.durand@univ-lorraine.fr
18- DANMARKS TEKNISKE UNIVERSITET (DTU)	Gitte Brandt (gitb@aqu.dtu.dk) is the main contact person for any data related issues and is our data protection officer at DTU Aqua, with fully delegated routine tasks and responsibilities
19-CENTRO DE CIÊNCIAS DO MAR DO ALGARVE (CCMAR)	ccmar@ualg.pt , with routine tasks and responsibilities fully delegated to Adelino Canario acanario@ualg.pt
20- INSTITUTO ESPANOL DE OCEANOGRAFIA (IEO)	Data contact: apoyodireccion.vigo@ieo.es (cc. unidad.proyectos@ieo.es and montse.perez@ieo.es in all correspondence)
21- PLATEFORME TECHNOLOGIQUE ET DE L'INNOVATION DE L'AQUACULTURE EUROPEENNE ASBL (EATIP)	The data processing responsible is Catherine Pons, Catherine@eatip.eu
22- UNIVERSITA DEGLI STUDI DI TORINO (UNITO)	Manuela Renna (manuela.renna@unito.it)

2. Personal data collected and processed

'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR, Article 4.1).

Legacy requirements: AQUAEXCEL3.0 is a 5 years project lasting from 01/11/2020 to 31/10/2025. Still, we consider likely that a follow-up project with a similar purpose (promotion of EU aquaculture research through access to infrastructures) may happen. In that case, we will consider re-use of

personal data, especially to ensure seamless dissemination of results. The delay of five years mentioned below for storage of personal data is the delay set by the European Commission for a possible audit of the AQUAEXCEL3.0 project, and for which we may have to prove the effectiveness of our activities, for which personal data on users, experts, project members may be needed.

The following paragraphs detail the conditions of data collection by the AQUAEXCEL3.0 project for different categories of data subjects.

2.1. Transnational access (TNA) applicants

Who are they? TNA applicants are individual scientists applying to the Transnational Access programme of AQUAEXCEL3.0, which offers the possibility to access “free of charge” to the infrastructures operated by AQUAEXCEL3.0 project members. Application will be made online on ARIA, a web platform operated by Instruct-ERIC

Data collection circumstances: Registration, submission and administration of a project on the ARIA web-based application system.

Data categories: Name, Surname, professional contact details, gender, nationality, project outline, project results, CV.

Purpose of processing: Project evaluation, provision of infrastructure services, reporting of results and dissemination.

Legal basis: legitimate interest

Data controller: INRAE

Data processors:

- Instruct-ERIC (Data storage and processing, under a Data Processing Agreement with INRAE)
- University of Stirling (management of TNA)
- Individual experts, Ethics adviser, Selection panel (bound by confidentiality agreement)
- ERINN Innovation (Knowledge management and dissemination)
- EATiP (Knowledge management and dissemination)
- Infrastructure managers of the project (feasibility and Implementation of access, reporting of access)

Data transfer outside of the EEA: May happen occasionally if external reviewers are from outside the EEA. All reviewers will be bound by a confidentiality agreement that ensures they do not transfer any personal data. UoS and Instruct-ERIC are out of the EEA (UK) but operate within the UK GDPR policy which has been recognized as equivalent to GDPR by an adequacy decision on the 28th of June 2021.

Duration of data conservation: 5 years after the end of the project (reporting and legacy requirements)

2.2. TNA Users

Who are they?: TNA users are TNA applicants whose project has been selected by AQUAEXCEL3.0 for funding. More data are needed for these users in order to practically organize their access to the infrastructures.

Data collection circumstances: Administration of access in the facilities (after a project has been selected and accepted)

Data categories: Name, Surname, professional contact details, gender, nationality, date of birth, project outline, project results, CV, proof of employment (working contract), ID documents, banking details,... as required by local administration

Purpose of processing: Authorization to enter and use the facilities, reimbursement of travel costs

Legal basis: to be determined by each data controller

Data controller: the home institution of the infrastructure accessed (see list of DPOs before)

Data processors:

- List to be provided to the user by the data controller

Data transfer outside of the EEA: In general no, except for the University of Stirling (UK, covered by an adequacy decision)

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements). Data will be removed from the ARIA system at the end of the project and transferred to INRAE, who will keep them and erase them after five years.

2.3. Expert reviewers, selection panel members, Ethics advisor

Who are they?: Expert reviewers are individual scientists who are asked to review TNA proposals submitted to AQUAEXCEL3.0. Internal experts are from within the AQUAEXCEL3.0 consortium, contrary to external experts. The Ethics Advisor is Prof. Felicity Huntingford, who advises the project and Ethics issues and especially performs an Ethics review on TNA projects. Selection panel members are eight individual scientists committed to participate to the AQUAEXCEL3.0 Selection Panel, which takes decisions on financing TNA projects based on expert reviews and Ethical review.

Data collection circumstances: Registration on the ARIA web-based TNA management system (all). Personal contact details, ID documents and banking information: collected by UoS to enable payment of external experts, external selection panel members and Ethics advisor.

Data categories: For all: Name, Surname, gender, professional contact details, professional qualifications (CV). For experts, selection panel member and ethics adviser which are external to the consortium: personal contact details, ID documents, banking information (data collected and processed by University of Stirling).

Purpose of processing: Participation to the project evaluation workflow on the ARIA system operated by Instruct-ERIC, financial compensation for those external to the consortium.

Legal basis: legitimate interest

Data controller: INRAE (for data processed by Instruct-ERIC), University of Stirling (for data related to payment of external panel members, reviewers and ethics adviser)

Data processors:

- Instruct-ERIC (Data storage and processing, under a Data Processing Agreement with INRAE)
- University of Stirling (management of TNA, finances)

Data transfer outside of the EEA: Yes. UoS and Instruct-ERIC are out of the EEA (UK) but operate within the UK GDPR policy which has been recognized as equivalent to GDPR by an adequacy decision on the 28th of June 2021.

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements)

2.4. Project members

Who are they? Project members are employees of the AQUAEXCEL3.0 partners which have been declared as having a role in the project (scientific or administrative) by the partners

Data collection circumstances: data provided by the main contact of each partner at project building stage, and amended upon necessity (changes in personnel) over the course of the project. Each partner shall inform the coordinator in changes in the project members as soon as possible, and review their projects member list in January each year.

Data categories: Name, Surname, professional contact details, gender, professional qualification.

Purpose of processing: Project administration, reporting, provision of project information

Legal basis: legitimate interest

Data controller: INRAE

Data processors:

- INRAE-Transfert (Data storage and processing)
- Members of the list of project members (through secured access to the project Intranet managed by INRAE Transfert)
- INRAE as a sub-processor of INRAE transfert (hosting of the project intranet (<https://sites.inra.fr/site/AQUAEXCEL3.0/SitePages/Home.aspx>) on a secured intranet hosted by INRAE on in-house secured servers)
- RENATER which is a French national telecommunications network for research community, this tool offers a highly reliable and secure network, facilitating collaboration and the convergence of scientific and academic projects at national but also European and international level. At the national level, RENATER provides internet access and related services to more than 1,300 sites in the Education - Research community. RENATER hosts the project internal mailing list

Data transfer outside of the EEA: Yes only when data accessed by the University of Stirling (UK, covered by an adequacy decision)

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements)

2.5. Industry Research Advisory Panel (IRAP) industry members

Who are they? IRAP industry members are industry experts identified by the European Aquaculture Technology and Innovation Platform who commit to participate to meetings of the Industry-Research Advisory panel of AQUAEXCEL3.0, which evaluates Knowledge Outputs of the project to select industry-relevant outputs deserving further promotion/support.

Data collection circumstances: nomination to IRAP by EATiP

Data categories: Name, Surname, professional contact details, gender, professional qualification (CV), banking details

Purpose of processing: communication to perform IRAP evaluation tasks, public communication about IRAP members, reimbursement of expenses and financial compensation for time

Legal basis: consent

Data controller: EATiP

Data processors: EATiP, ERINN Innovation

Data transfer outside of the EEA: No

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements)

2.6. Website visitors

Who are they? any visitor connecting to the AQUAEXCEL3.0 website

Data collection circumstances: Connexion to the aquaexcel.eu website (cookies). Subscription to newsletter by clicking on a link, and actively subscribing 'opting in' on the website.

Data categories: Analytical data collected on an aggregated basis of all visitors to the website. The data collected through Google Analytics is anonymised and is therefore not personally identifiable. For the purpose of communication and dissemination, news, events and the project newsletter will be shared via email using the. Users can sign up to receive this e-newsletter and project news via the "Subscribe to news" link on the website homepage. To sign up, it is required that you provide your email address and your first and last names. Optionally, you may also provide further details, such as your organisation name and stakeholder group. The Mailchimp privacy policy can be viewed here <https://mailchimp.com/legal/privacy/>. A cookies banner will be put in place to enable the selection of user-accepted cookies.

Purpose of processing: Analytical data collected on the website is used to track/monitor communication engagement on the project website and used to inform project reporting necessary for the EC. Email addresses collected from subscription list will be used to share project news, events, updates and newsletters.

Legal basis: consent

Data controller: ERINN Innovation

Data processors: ERINN Innovation, Mailchimp email marketing platform (privacy policy can be viewed here <https://mailchimp.com/legal/privacy/>)

Data transfer outside of the EEA: No

Duration of data conservation: The mailing list will be maintained throughout the duration of the project. In the event of another AQUAEXCEL project in the future, all those subscribed to news for AQUAEXCEL3.0 will have the opportunity to 'opt in' to receive the next project's news into the future.

2.7. Training Course Applicants

Who are they?: Applicants and attendees to distance learning AQUAEXCEL3.0 training courses.

Data collection circumstances: Administration and processing associated with applying and participating in AQUAEXCEL3.0 training course.

Data categories: Name, Surname, professional contact details, nationality, gender, organisation name, organisation type, position/job title, qualification, research category and previous relevant experience.

Purpose of processing: Giving access to the course online platform, sharing training resources, reporting and contacting purposes.

Legal basis: consent

Data controller: Wageningen University

Data processors:

- ERINN Innovation (course information and follow-up)
- Wageningen University (course organisation)
- INRAE (Reporting)

Data transfer outside of the EEA: No

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements)

2.8. Brokerage events participants

Who are they?: Attendees to AQUAEXCEL3.0 brokerage events (in person or online)

Data collection circumstances: Administration and processing associated with planning an event and informing interest parties.

Data categories: Name, Surname, professional contact details, nationality, gender, organisation name, organisation type, position/job title.

Purpose of processing: event organisation, reporting of attendance and categories of attendees, follow-up with parties interested in the innovations presented at the brokerage events

Legal basis: consent

Data controller: EATiP

Data processors:

- EATiP
- ERINN Innovation

Data transfer outside of the EEA: No

Duration of data conservation: 5 years after the end of the project (reporting, audit and legacy requirements)

Data minimisation principle

The collection of personal data within the framework of AQUAEXCEL3.0 is limited to the activities of WP1, WP2, WP3, WP7 and Transnational access

Partners leading and co-leading WPs must ensure that any collection and processing of personal data carried out for any project-related activity is legitimate and compliant with the project's overall objectives. In order to be compliant with Data Minimisation, data collection will only involve data that are necessary and proportionate to achieve the specific task or purpose for which they were collected (Article 5(1) GDPR). For example, date of birth, which is a generally collected data for personal identification purposes is not collected for TNA users as we consider work email address a sufficient identification proof at the proposal submission stage. Gender is collected for several user types, not because it is necessary for project administration, but because it is necessary to address gender issues in the reporting process to the European Commission.

Any issues/questions potentially emerging in the course of the project should be discussed with the DPO and the project coordinator as outlined above in 1.

3. Protection of the data subjects' rights and freedoms

Data subjects will be fully informed about their rights and freedoms through the consent form which they will be asked to sign in order to collect their data when the legal basis is consent (see § 2.5 to 2.8), or by being informed on the present privacy policy (when the legal basis is legitimate interest, §2.1 to 2.4). This includes:

- The right to obtain confirmation whether their data are being processed and the right to access it
- The right to request rectification of the collected data
- The right to erasure of personal data ('right to be forgotten')
- The right to request restriction of processing
- The right to data portability
- The right to object
- The right to withdraw the given consent when the legal basis of data processing is consent (IRAP members, users signing up to the news on the website, see § 2.5 and 2.6)

All requests should be addressed to marc.vandeputte@inrae.fr who will convey it to the appropriate operators.