



TWIN TRANSITION AND CHANGING PATTERNS OF SPATIAL MOBILITY: A REGIONAL APPROACH

MOBI-TWIN PRIVACY POLICY

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Abstract	The purpose of this privacy policy is to inform users, stakeholders, and anyone interacting with the project about how their personal information will be collected, used, stored, and protected.
Disclaimer	<p>The information and views set out in this publication are those of the author(s) and do not necessarily reflect the official opinion of the European Communities. Neither the European Union institutions and bodies nor any person acting on their behalf may be held responsible for the use which may be made of the information contained therein.</p> <p>COPYRIGHT@ MOBI-TWIN CONSORTIUM 2023</p>

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Project Partners



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1 MOBI-TWIN PRIVACY POLICY

How we collect your personal data

We collect personal data both directly and indirectly:

Directly. We obtain personal data directly from individuals in a variety of ways, including but not limited to the following cases:

- an individual registers to attend in meetings and events we host and during attendance at such events;
- an individual participates in an interview or survey organised by us;
- an individual subscribes to our project newsletter;
- we establish cooperative relationships with an individual;
- we provide professional services pursuant to our contract with the European Commission.

Indirectly. We obtain personal data indirectly about individuals from a variety of sources, including:

- our research partners;
- our networks and contacts;
- public and open data sources such as public registers, news articles and internet searches;
- social and professional networking sites (e.g., LinkedIn).

What types of data we collect?

We only collect the data that are necessary for the smooth implementation of our project. These data fall into the following categories:

- **contact details** (name/surname, e-mail address, phone number);
- **professional information** (job title, organisation, field of expertise);
- **demographics** (e.g. age, gender, nationality);
- information about what a person knows or believes;
- **videos and photos** (from people that attend our events).

Technical means of data collection

Your personal data may be collected on publicly available websites, through partners' databases, via surveying software (e.g., Google Forms, EU Survey, SurveyMonkey) and via direct enquiry to you during project activities. Should we collect your personal data in any

other way than through direct enquiry with you, we will make sure to inform you about this and about the source of the data.

Bases of lawful processing

We process personal data on the following legal bases:

- **Legal obligations** - for processing activities required for compliance both with applicable national and European legislation as well as with the specific legal and regulatory framework of the Horizon Europe Framework Programme for Research and Innovation of the European Union.
- **Consent** – for processing activities such as organization of surveys and interviews, completing of questionnaires and dissemination of project's results.
- **Contractual obligations** - for processing activities such as reporting to the European Commission and complying with project's publicity obligations.

What we do with your personal data

We process your personal data with the purpose of:

- Conducting research (e.g., interviews, workshops, surveys);
- Dissemination our project's results to different types of stakeholders;
- Sending invitations and providing access to guests attending our events and webinars;
- Administering, maintaining, and ensuring the security of our information systems, applications, and websites;
- Processing online requests or queries, including responding to communications from individuals;
- Complying with contractual, legal, and regulatory obligations.

How we secure your personal data when we process it

We continuously apply a personal data risk assessment process to identify, analyse, and evaluate the security risks that may threaten your personal data. Based on the results of this risk assessment, we define and apply a set of both technical and organizational measures to mitigate the above security risks, including but not limited to:

- Data Protection Policies to guide our personnel when processing your data;

- Written contracts with organizations that process personal data on our behalf;
- Non-Disclosure Agreements with our personnel;
- Back up process, antimalware protection, access control mechanisms, etc.

Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. When we do so, we ensure that recipients are contractually bound to safeguard the data we entrust to them before we share the data. We may engage with several or all the following categories of recipients:

- Parties that support us as we provide our services (e.g., cloud-based software services such as Google Drive, Dropbox, Microsoft Sharepoint);
- Our professional advisers, including lawyers, auditors, and insurers;
- Dissemination services providers (e.g., MailChimp);
- Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with applicable law or regulation;
- The European Commission according to our relevant contractual obligations.

Do we transfer your personal data outside the European Economic Area?

We do not own file servers located outside the European Economic Area (EEA). However, some partners may use cloud and / or marketing services from reputable providers such as Google Drive, SharePoint, DropBox, MailChimp, etc., situated both inside and outside the EEA. We always check that such providers comply with the relevant GDPR requirements before start using their services.

MOBI-TWIN website Privacy Policy

MOBI-TWIN project website: <https://mobi-twin-project.eu/>

At MOBI-TWIN, accessible from <https://mobi-twin-project.eu/>, one of our main priorities is the privacy of our visitors. This Privacy Policy document contains types of information that is collected and recorded by MOBI-TWIN and how we use it.

If you have additional questions or require more information about our Privacy Policy, do not hesitate to contact us.

This Privacy Policy applies only to our online activities and is valid for visitors to our website with regards to the information that they shared and/or collect in MOBI-TWIN. This policy

is not applicable to any information collected offline or via channels other than this website.

Consent

By using our website, you hereby consent to our Privacy Policy and agree to its terms.

Information we collect

The personal information that you are asked to provide, and the reasons why you are asked to provide it, will be made clear to you at the point we ask you to provide your personal information.

If you contact us directly, we may receive additional information about you such as your name, email address, phone number, the contents of the message and/or attachments you may send us, and any other information you may choose to provide.

When you register for an Account, we may ask for your contact information, including items such as name, company name, address, email address, and telephone number.

How we use your information

We use the information we collect in various ways, including to:

- Provide, operate, and maintain our website
- Improve, personalize, and expand our website
- Understand and analyze how you use our website
- Develop new products, services, features, and functionality
- Communicate with you, either directly or through one of our partners, including for customer service, to provide you with updates and other information relating to the website, and for marketing and promotional purposes
- Send you emails
- Find and prevent fraud

Log Files

MOBI-TWIN follows a standard procedure of using log files. These files log visitors when they visit websites. All hosting companies do this and a part of hosting services' analytics. The information collected by log files include internet protocol (IP) addresses, browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages, and possibly the number of clicks. These are not linked to any information that is personally identifiable. The purpose of the information is for analyzing trends, administering the site, tracking users' movement on the website, and gathering demographic information.

Cookies and Web Beacons

Like any other website, MOBI-TWIN uses "cookies". These cookies are used to store information including visitors' preferences, and the pages on the website that the visitor accessed or visited. The information is used to optimize the users' experience by customizing our web page content based on visitors' browser type and/or other information.

Our Advertising Partners

Some of advertisers on our site may use cookies and web beacons. Our advertising partners are listed below. Each of our advertising partners has their own Privacy Policy for their policies on user data. For easier access, we hyperlinked to their Privacy Policies below.

- Google

<https://policies.google.com/technologies/ads>

Advertising Partners Privacy Policies

You may consult this list to find the Privacy Policy for each of the advertising partners of MOBI-TWIN.

Third-party ad servers or ad networks uses technologies like cookies, JavaScript, or Web Beacons that are used in their respective advertisements and links that appear on MOBI-TWIN, which are sent directly to users' browser. They automatically receive your IP address when this occurs. These technologies are used to measure the effectiveness of their advertising campaigns and/or to personalize the advertising content that you see on websites that you visit.

Note that MOBI-TWIN has no access to or control over these cookies that are used by third-party advertisers.

Third Party Privacy Policies

MOBI-TWIN's Privacy Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

CCPA Privacy Rights (Do Not Sell My Personal Information)

Under the CCPA, among other rights, California consumers have the right to:

Request that a business that collects a consumer's personal data disclose the categories and specific pieces of personal data that a business has collected about consumers.

Request that a business delete any personal data about the consumer that a business has collected.

Request that a business that sells a consumer's personal data, not sell the consumer's personal data.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

GDPR Data Protection Rights

We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.

The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.

The right to erasure – You have the right to request that we erase your personal data, under certain conditions.

The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions.

The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.

The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

If you make a request, we have one month to respond to you. If you would like to exercise any of these rights, please contact us.

Children's Information

Another part of our priority is adding protection for children while using the internet. We encourage parents and guardians to observe, participate in, and/or monitor and guide their online activity.

MOBI-TWIN does not knowingly collect any Personal Identifiable Information from children under the age of 13. If you think that your child provided this kind of information on our website, we strongly encourage you to contact us immediately and we will do our best efforts to promptly remove such information from our records.

Changes to This Privacy Policy

We may update our Privacy Policy from time to time. Thus, we advise you to review this page periodically for any changes. We will notify you of any changes by posting the new Privacy Policy on this page. These changes are effective immediately, after they are posted on this page.

Contact Us

If you have any questions or suggestions about our Privacy Policy, do not hesitate to contact us at info@mobi-twin-project.eu.

MOBI-TWIN website Cookies Policy

This is the Cookie Policy for MOBI-TWIN, accessible from <https://mobi-twin-project.eu/cookies-policy/>

What Are Cookies

As is common practice with almost all professional websites this site uses cookies, which are tiny files that are downloaded to your computer, to improve your experience. This page describes what information they gather, how we use it and why we sometimes need to store these cookies. We will also share how you can prevent these cookies from being stored however this may downgrade or 'break' certain elements of the sites functionality.

How We Use Cookies

We use cookies for a variety of reasons detailed below. Unfortunately in most cases there are no industry standard options for disabling cookies without completely disabling the functionality and features they add to this site. It is recommended that you leave on all cookies if you are not sure whether you need them or not in case they are used to provide a service that you use.

Disabling Cookies

You can prevent the setting of cookies by adjusting the settings on your browser (see your browser Help for how to do this). Be aware that disabling cookies will affect the functionality of this and many other websites that you visit. Disabling cookies will usually result in also disabling certain functionality and features of the this site. Therefore it is recommended that you do not disable cookies.

The Cookies We Set

- Email newsletters related cookies

This site offers newsletter or email subscription services and cookies may be used to remember if you are already registered and whether to show certain notifications which might only be valid to subscribed/unsubscribed users.

- Forms related cookies

When you submit data to through a form such as those found on contact pages or comment forms cookies may be set to remember your user details for future correspondence.

Third Party Cookies

- In some special cases we also use cookies provided by trusted third parties. The following section details which third party cookies you might encounter through this site.
- This site uses Google Analytics which is one of the most widespread and trusted analytics solution on the web for helping us to understand how you use the site and ways that we can improve your experience. These cookies may track things such

as how long you spend on the site and the pages that you visit so we can continue to produce engaging content.

- For more information on Google Analytics cookies, see the official Google Analytics page.
- Third party analytics are used to track and measure usage of this site so that we can continue to produce engaging content. These cookies may track things such as how long you spend on the site or pages you visit which helps us to understand how we can improve the site for you.
- From time to time we test new features and make subtle changes to the way that the site is delivered. When we are still testing new features these cookies may be used to ensure that you receive a consistent experience whilst on the site whilst ensuring we understand which optimisations our users appreciate the most.
- We also use social media buttons and/or plugins on this site that allow you to connect with your social network in various ways. For these to work the following social media sites including; [List the social networks whose features you have integrated with your site?:12], will set cookies through our site which may be used to enhance your profile on their site or contribute to the data they hold for various purposes outlined in their respective privacy policies.

More Information

Hopefully that has clarified things for you and as was previously mentioned if there is something that you aren't sure whether you need or not it's usually safer to leave cookies enabled in case it does interact with one of the features you use on our site.

For more general information on cookies, please read the [Cookies Policy article](#).

However if you are still looking for more information then you can contact us through one of our preferred contact methods:

- Email: mobitwindissemination@gmail.com

Your rights

You have the following rights regarding our processing of your personal data:

- **Right to withdraw consent** – You can withdraw consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right of access** – You can ask us to verify whether we are processing personal data about you and, if so, to have access to a copy of such data.
- **Right to rectification and erasure** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you or ask us to erase your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.

- **Right to restriction of processing** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- **Right to data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another entity.
- **Right to object** – You can object to our use of your personal data for direct marketing purposes, including profiling or where processing has taken the form of automated decision-making. However, we may need to keep some minimal information (e.g., e-mail address) to comply with your request to cease marketing to you.
- **Right to make a complaint to your local Data Protection Authority (DPA)** regarding any concerns you may have about our data handling practices.
(see https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

To ask us to do anything of the above, you can contact us by email: contact@mobi-twin.eu

We will promptly examine your request against the relevant requirements of the laws and regulations governing privacy and personal data protection and we will answer the latest within 30 days after receiving your request. We will ask from you some kind of identification (e.g., photocopy of your identity card or passport) to avoid non-authorized reveal of your personal data. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within 30 days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline.

How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations, and contractual obligations to which we are subject. Please note that we have an obligation to retain data concerning projects funded by the Horizon Europe Framework Programme for Research and Innovation of the European Union for up to five years after the end of the project (unless further retention is requested by auditors). After the expiry of the retention period, and unless further legitimate grounds for retention arise, we will dispose of personal data in a secure manner.

Disclaimer of liability for third party websites

Although our site may contain links to third-party sites, including the sites of the consortium partners, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site's responsible personnel. We suggest you read the privacy policy of each website you interact with, before allowing the collection and use of your personal data.

We may also provide social media features that allow you to share information on your social networks and interact with our project on various social media sites. The use of these social media features may result in the collection or sharing of information about you. We recommend that you check the privacy policies and regulations of the social networking sites you interact with, so that you can be sure that you understand what information may be collected, used, and disclosed by these sites.