EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Processing of personal data within the EOSC EU Node

Data Controller: European Commission, Directorate-General for Communications Networks, Content and Technology (also called Connect), CNECT.C.1 (hereafter "CNECT.C.1")

Processors:

- **([1])Athena Research and Innovation Centre in Information Communication and Knowledge Technologies** (Athena RC), Artemidos 6 & Epidavrou, 151 25 Maroussi, Athens, Greece (hereinafter "Athena RC")
- **([2])Stichting EGI Foundation**, Science Park 140, 1098XG Amsterdam, the Netherlands
- **([3])NETCOMPANY-INTRASOFT S.A.**, 2B, Rue Nicolas Bové, Luxembourg, L-1253 Luxembourg
- **([4])OpenAIRE AMKE**, 6 Artemidos & Epidavrou, 151 25 Maroussi, Greece
- **([5])Instytut Chemii Bioorganicznej Polskiej Akademii NAUK – Poznań Supercomputing and Networking Center Institute of Polish Academy of Sciencies (PSNC**), Noskowskiego 12/14, 61-704 Poznań, Poland (hereinafter "PSNC")
- **([6])KARLSRUHE INSTITUTE OF TECHNOLOGY (KIT),** Kaiserstr. 12, 76131 Karlsruhe, Germany

Sub-processors are listed in: ANNEX 1 – List of sub-processors

Record reference: DPR-EC-26549

([1]) Athena RC is the Consortium Lead (Group Leader), representing the Consortium and managing all contractual interactions with the CA, and is responsible for the day-to-day management and monitoring of all project activities.

([2]) EGI is responsible for the provision of Managed Services: "Monitoring and Accounting Frameworks", "Application Workflow Management (Configuration Management System)" and "Service Management System (IT Services Management Framework)".

([3]) NIS (Netcompany-Intrasoft) is responsible for: (i) EOSC Portal CMS, (ii) User Space, (iii) UI design according to EC guidelines and specifications, (iv) Service Catalogue, (v) Marketplace, (vi) order management system, (vii) participation in verification and testing, (viii) overall service management, (ix) participation in operations maintenance and support.

([4]) OpenAIRE (OpenAIRE AMKE). OpenAIRE is responsible for the provision of Managed Service "Multifaceted (incl. Data, Publications, Code, Services, Tools and Recipes) Resource Catalogues and Registry Services".

([5]) PSNC is responsible for building and operating the IT infrastructure, providing HPC, cloud computing, storage and high-speed networking facilities as well as developing and provisioning IT services for computing, data analysis and data-based collaboration.

([6]) KIT is responsible for the Helpdesk service of the EOSC EU Node as well as for the Helpdesk as a Service offering.

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1. Introduction

The European Commission (hereafter 'the Commission') is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council, of 23 October 2018, on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation "*Processing of personal data within the EOSC EU Node"* undertaken by CNECT.C.1 is presented below.

2. Why and how do we process your personal data?

CNECT.C.1 collects and uses your personal information to provision the "EOSC EU Node" services.

The Commission provides and maintains the EOSC EU Node, a digital platform to enhance public access to information about research data, tools and services promoting the European Union's Policy on Open Science and European Strategy for Data. The EOSC EU Node is the first node of the European Open Science Cloud (EOSC) Federation ([7]). The processing of your personal data is carried out for the purpose of providing, managing and operating the managed services of the EOSC EU Node digital platform. In particular:

- To **authenticate** you via the GEANT MyAccessID service ([8]), based on the Identity Providers (IdP) of your choice:
    - EU Login (including the eIDAS option);
    - eduGAIN inter-federation service for the research and education community.

  While EU Login (including eIDAS) covers the citizen scientist and Commission staff, the eduGAIN inter-federation covers academia and researchers as the target users of the platform. In this particular case, GEANT is acting as processor of the personal data retrieved from IdPs and provided to the EOSC EU Node services.

- To **authorize users and enforce Access Policies**: this processing activity allows authenticated users to access EOSC EU Node services, and define, monitor and enforce specific quota/service limits (which are modelled and communicated as 'virtual credits' according to the EOSC EU Node's User Access Policy (UAP) document in force) ([9]). A user

([7]) The collective name of the interoperable EOSC nodes connected with each other.

([8]) Privacy Notice of the GEANT MyAccessID service.

([9]) Available [in the user space]. In summary:

is authorized to access an EOSC EU Node service based on automated Access Policy Group allocation. The allocation decision into access policy groups uses attributes retrieved from the user's IdP. Requests for additional quota/service limits and virtual credits for EOSC EU Node services may be examined on a case-by-case basis, following a user request and depending on the available resources.

- To perform a**ccounting for EOSC EU Node services**: your personal data are processed to allocate resources, monitor virtual credit consumption and services utilization, revise access policies, revoke credits and access to services, release under-utilized resources, ban users based on the EOSC EU Node's Acceptable Usage Policy (AUP) ([10]) and User Access Policy (UAP) documents in force ([11]).

- To provide **Knowledge Graph (KG) of Research Products**: your personal data are processed to provision a KG of Open Science research products (scientific publications, data, software, tools, training) and EOSC EU Node infrastructure and application services, to enable open and FAIR scholarly communication for authenticated users. The KG is created by harvesting and aggregating (i) existing open data sources (e.g., OpenAIRE, CORDIS) which contain author information as per scholarly communication practices, (ii) EOSC EU Node catalogues (e.g., training material, tools), and (iii) catalogues of similar open scholarly content from other EOSC Nodes (in the future). The KG handles information about user identities and favourite items of the authenticated users and passes that information to other services of the EOSC EU Node.

- To provide you with **application Workflow Management service**: this allows authenticated users to create your own configuration files and templates (e.g., configuration files needed e.g., to deploy a specific application in a selected infrastructure) published and shared via the KG and automatically used in the infrastructure services of the EOSC EU Node. Shared configuration files allows you to repeat experiments easily.

- Access policy group "A" allows view-only access to all EOSC EU Node services based on the successful authentication of the user via the Federated AAI service (i.e. no particular user attributes are used). User gets no virtual credits.
- Access policy group "A1" allows full access to application services and some infrastructure of the EOSC EU Node based on user attributes listed below (scoped affiliation value must be "employee" or "staff" in eduGAIN and domain value must be "eu.europa.ec" in EU Login). User gets virtual credits allocated to use services according to the UAP.
- Access policy group "B" allows full access to both application and infrastructure services of the EOSC EU Node based on user attributes listed below (scoped affiliation value must be "faculty" member in eduGAIN). User gets virtual credits allocated to use services according to the UAP.

Please note that Users in access policy group "B" are also allowed to invite other authenticated users from any other policy groups to their virtual team. Virtual team members are allocated virtual credits to be shared among themselves when using the services. All team members get the same authorization level to services.

([10]) EOSC EU Node's Acceptable Use Policy (AUP) : https://open-science-cloud.ec.europa.eu/support/acceptable-use-policy

([11]) EOSC EU Node's User Access Policy (UAP) : https://open-science-cloud.ec.europa.eu/support/user-access-policy

- To provide you with **personalized Recommendations** (if you have turned on this feature), that is to say relevant Research Products of the Knowledge Graph based on your past search criteria and navigation history (e.g., recommend a scientific data set based on the user's search queries and viewed publications).

- To provide **Infrastructure and Application Services from the EOSC EU Node**. These include commoditized and research-focused infrastructure services (Virtual Machines, Container Platform Services and Bulk Data Transfer) and application services (Interactive Notebooks, File Sync & Share and Large File Transfer Service) offered for free at the point of use by the EOSC EU Node to its authenticated users. Access policy group "A1" allows access to application services, access policy group "B" allows access to both application and infrastructure services, in accordance with its User Access Policy and Acceptable Usage Policy documents in force.

- To provide **Performance & Service Level Agreement (SLA) monitoring**. Monitor and fine-tune the performance, availability and scalability of the EOSC EU Node services (e.g., provisioning of resources, indexing, scaling of cloud resources) to ensure a high-quality user experience and within the target SLAs. This service includes processing of logs and logging history of the users and their IP addresses.

- To provide you with **Helpdesk service** regarding all technical and administrative aspects of the operation, maintenance and support of the EOSC EU Node. The first line helpdesk support is implemented as a web form where authenticated users can first contact the operators briefly describing their issue. This leads to the creation of a ticket in the Helpdesk system of which you are informed via e-mail. You can track the ticket in the Helpdesk system directly provided via the link in the e-mail. The first line support may pass forward the ticket to second and third line support helpdesks, operated by the particular service providers with deep technical knowledge.

- To provide **Helpdesk as a Service (HaaS)**: the EOSC EU Node offers its helpdesk platform as a service to other nodes and service providers as contributors enabling them to operate their own user support workflows on the EOSC EU Node's helpdesk infrastructure. The service is regulated by the EOSC EU Node's Resources and Services Onboarding Policy (RSOP) ([12]). If you are a user of another EOSC node or service that relies on HaaS, support requests you submit are processed via the EOSC EU Node's helpdesk infrastructure. The HaaS is provided by KIT. In this particular case, CNECT C.1 is acting as processor for the other nodes and service providers, and its processing activity is limited to storing the personal data mentioned here. KIT is therefore sub-processor for other nodes and service providers. This relationship is regulated by the required Data Processing Agreement (DPA).

- To provide a **Contributors Dashboard**: a dedicated dashboard visible to authenticated users who are contributors to the EOSC EU Node (e.g., providers of research products, training materials, tools or services). The Contributors Dashboard allows contributors to

([12]) EOSC EU Node's Resources and Services Onboarding Policy (RSOP) https://open-science-cloud.ec.europa.eu/support/resources-and-services-onboarding-policy

view and manage the resources they have contributed, monitor contribution metrics, and track the lifecycle of their submissions. The service is regulated by the EOSC EU Node's Resources and Services Onboarding Policy (RSOP). This service is provided by Athena RC.

3. On what legal ground(s) do we process your personal data

CNECT C.1 processes your personal data on the basis of Article 5(1)(d) of Regulation 2018/1725 (**consent**) for the following purposes:

- For all processing activities entailed by the use of EOSC EU Node, your consent is collected when you first login;
- For the processing of personal data when you request helpdesk services, your consent is collected in the web form used to contact the operators.
- For the processing of personal data when you request HaaS, your consent is collected where you submit your request for support.

4. Which personal data do we collect and further process*?*

CNECT.C.1 processes various categories of personal data for the various purposes mentioned above:

- **For authentication:**
  - First and last name
  - Email address
  - Username
  - User identifier
  - Country
  - Organization
  - Scoped affiliation (for eduGAIN users)
  - Domain name (for EU Login users including eIDAS)

- **For automated access policy decisions and enforcement**:
  - Username
  - User identifier
  - Country (EU Member States and Horizon Europe Affiliated Countries)
  - Scoped affiliation (for eduGAIN users)
  - Domain name (for EU Login users including eIDAS)
  - Entitlements (policy group for accessing services)
  - Group membership

- For **accounting purposes**:
  - First and last name
  - Email address
  - Username
  - User identifier
  - Entitlements (policy group for accessing services)
  - Group membership
  - User agent
  - IP address
  - Timestamps

    - Resource consumption (credit balance and spending, orders, allocation, utilization)

- **For the Knowledge Graph service**:
    - Username
    - User identifier
    - Resources created
    - Resources targeted (viewed, accessed)
    - Resources shared (downloaded, commented)

- For the **Application Workflow Management service**:
    - Username
    - User identifier
    - IP address
    - Group membership
    - Resources created
    - Resources targeted (viewed, accessed)
    - Resources shared (downloaded, commented)

- **For the infrastructure and application services of the EOSC EU Node process**:
    - First and last name
    - Email address
    - Username
    - User identifier
    - Entitlements (policy group for accessing services)
    - Group membership
    - User agent
    - IP address
    - Timestamps
    - Resource consumption (credit balance and spending, orders, allocation, utilization)

- **If you request Helpdesk services**:
    - First and last name
    - Email address
    - Username
    - User identifier
    - Entitlements (policy group for accessing services)
    - Group membership
    - User agent
    - IP address
    - Timestamps
    - Resource consumption (credit balance and spending, orders, allocation, utilization)
    - Specific issue as described by the user.

- **If you request the Helpdesk as a Service (HaaS)** offered to contributors:
    - First and last name
    - Email address
    - Username
    - User identifier
    - Timestamps
    - Specific issue as described by the user.

- For the **Contributors Dashboard**:
  - First and last name
  - Email address
  - Username
  - User identifier
  - Contributor status (flag allocated by the EOSC EU Node as Node-side metadata, indicating whether the authenticated user has a contributor role)
  - Contributions metadata (resources created, contributed, edited)
  - Timestamps.

- For **monitoring services**:
  - Username
  - User identifier
  - Entitlements (policy group for accessing services)
  - Group membership
  - User agent
  - IP address
  - Timestamps
  - Resource consumption (credit balance and spending, orders, allocation, utilization)

- **If you agree to "Personalized recommendations"**:
  - Username
  - User identifier
  - Resources created
  - Resources targeted (viewed, accessed)
  - Resources shared (downloaded, commented)
  - Resource consumption (credit balance and spending, orders, allocation, utilization)
  - Search history

5. How long do we keep your personal data?

CNECT.C.1 only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing, namely **5 years from your last successful login to the EOSC EU Node or until you request to delete the relevant personal data via Helpdesk**.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored either on the servers of the Commission or of its contractors. All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46, of 10 January 2017, on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures in place. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Commission staff responsible for managing the EU Node have access to all personal data processed by the EOSC EU Node on a "need to know" basis.

Commission staff responsible for ECAS (Identity & Access Management Service) have access to personal data processed by the EU Login service, including user attributes automatically retrieved by the EOSC EU Node on a "need to know" basis.

Processors staff have access to all personal data processed by the EOSC EU Node on a "need to know" basis.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have the **right to withdraw your consent at any time by notifying CNECT C.1**. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

9. Contact information

- **The Data Controller**

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, CNECT-C1@ec.europa.eu

- **The Data Protection Officer (DPO) of the Commission**

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: http://ec.europa.eu/dpo-register.

This specific processing operation has been included in the DPO's public register with the following Record reference: DPR-EC-26549.

ANNEX 1 – List of sub-processors

GESELLSCHAFT FÜR WISSENSCHAFTLICHE DATENVERARBEITUNG MBH GÖTTINGEN (GWDG), Burckhardweg 7, 37124 Göttingen, Germany

GRNET S.A. – NATIONAL INFRASTRUCTURES FOR RESEARCH AND TECHNOLOGY (GRNET), 7 Kifisias Ave., Athens, 11523, Greece

GÉANT VERENIGING (GEANT), Nieuw Amsterdam, Level 6, Hoekenrode 3, 1102 BR Amsterdam

UNIVERSITAT POLITÈCNICA DE VALÈNCIA (UPV), Camino de Vera s/n, Valencia, Spain

UNIVERSITY OF ZAGREB UNIVERSITY COMPUTING CENTRE (SRCE), Josipa Marohnica 5, HR-10000 Zagreb, Croatia

Nikhef by way of Stichting Nederlandse Wetenschappelijk Onderzoek Instituten (NIKHEF), Science Park 105, 1089 XG Amsterdam, The Netherlands

JOŽEF STEFAN INSTITUTE (JSI), Jamova cesta 39, 1000 Ljubljana, Slovenia

CESNET, ZAJMOVE SDRUZENI PRAVNICKYCH OSOB (CESNET), Generála Píky 430/26, Dejvice, 160 00 Praha 6, Czech Republic

Safespring AB, Rättarvägen 3, 169 68 Solna, Sweden

ICM, Tyniecka 15/17, 02-630 Warsaw, Poland

University of Minho, Largo do Paço, Braga 4704-553, Portugal

NORDUnet, Kastruplundgade 22, 1 2770 Kastrup, Denmark

ownCloud GmbH, Rathsbergstraße 17, 90443 Nuernberg, Germany