



LAGO

Lessen Data Access and Governance Obstacles

Privacy Policy

Of the LAGO Training Platform



Funded by the European Union

1 Disclaimer

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Visit the LAGO's official website: <https://lago-europe.eu/>



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2 Privacy Notice

The protection of your personal data is of high importance to the consortium of the LAGO project; therefore we take all reasonable care to ensure that your personal data is processed according to the General Data Protection Regulation (GDPR) Regulation 2016/679.

When visiting the training platform, you may share your personal data with the LAGO consortium and the beneficiary partner IANUS Technologies Ltd. (www.ianus-technologies.com), acting as a data controller.

The LAGO Training Platform is hosted in [Moodle](#). Moodle is part of the eLeDia GmbH, seated in Berlin, Germany. According to Moodle's data protection information, the data will not be passed on to third parties. Responsible for the operation is eLeDia GmbH, Mahlower Str. 23/24, D-12049 Berlin; info@eledia.de; telephone: +49-3050561070 (responsible contact: Ralf Hilgenstock). The data protection officer can be contacted: datenschutz@eledia.de. The privacy policy can be reviewed, if necessary, by the data controller and be updated and re-published on the platform.

2.1 What personal data we collect from you

We are committed to protecting your privacy and handling your personal data with care and respect. Concerning the personal data processed by the LAGO project, participants have the following statutory rights under the General Data Protection Regulation 2016/679 - GDPR):

- Right to information according to Art. 15 GDPR.
- Right to access according to Art. 15 GDPR.
- Right to rectification according to Art. 16 GDPR.
- Right to erasure ('right to be forgotten') according to Art. 17 para. 1 GDPR.
- Right to restriction of processing according to Art. 18 GDPR.
- Right to data portability according to Art. 20 GDPR.
- Right to object according to Art. 21 GDPR.
- Right to lodge a complaint with a supervisory authority.

For the scope of using the online training platform, we collect the following types of personal data:

- Contact Information - This includes your name, email address, and any other contact details you provide us.
- Platform log data: including your IP address, the address of the web page you visited, your browser type and settings, the date and time of your access, how you used this platform. We may also collect information about the device you are using to access this platform.
- Information you voluntarily provide in contact forms, registration forms and surveys, including first and last name, email address, site preferences and profile information

2.2 What is your data used for?

Your data is used for the following purposes:

- Platform operationality and Communication:



- sending e-mail updates: provide you with content related to LAGO training activities, material and certificates via e-mail;
- enabling access to training contents and downloads related to the LAGO project (e.g. presentations, reading material, quizzes and evaluation forms etc.);

The provision of your personal data is not optional. Should you decide not to provide your personal data, LAGO may be unable to provide you with such requested services.

2.3 Will data be used for automated decision making?

Data processed for the purposes of operating the training platform will not be used for automated decision making.

2.4 Duties of our Data Protection Officer

The primary role of the Data Protection Officer (DPO) is to ensure that her organisation processes the personal data of its staff, customers, providers or any other individuals (also referred to as data subjects) in compliance with the applicable data protection rules. The DPO is designated pursuant to Article 37(1)(b) of Regulation (EU) 2016/679,¹ given that the core activities of the controller of the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale.

According to Article 38 of Regulation (EU) 2016/679, the position of the DPO is as follows:

1. The controller and the processor shall ensure that the DPO is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.
2. The controller and processor shall support the DPO in performing the tasks referred to in Article 39 by providing resources necessary to carry out those tasks and access to personal data and processing operations, and to maintain her expert knowledge.
3. The controller and processor shall ensure that the data protection officer does not receive any instructions regarding the exercise of those tasks. She shall not be dismissed or penalised by the controller or the processor for performing her tasks. The DPO shall directly report to the highest management level of the controller or the processor.
4. Data subjects may contact the DPO with regard to all issues related to processing of their personal data and to exercise their rights under Regulation (EU) 2016/679.
5. The DPO shall be bound by secrecy or confidentiality concerning the performance of her tasks, in accordance with EU law.
6. The DPO may fulfil other tasks and duties. The controller and processor shall ensure that any such tasks and duties do not result in a conflict of interests.

According to Article 39 of Regulation (EU) 2016/679, the DPO has the following tasks:

¹ Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (OJ L 119, 4.5.2016, p.1), available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02016R0679-20160504>



1. To inform and advise the controller or the processor and the employees who carry out processing of their obligations pursuant to Regulation (EU) 2016/679 and to EU or other Member State data protection provisions;
2. To monitor compliance with Regulation (EU) 2016/679, with other EU or Member State data protection provisions and with policies of the controller or processor in relation to the protection of personal data, including the assignment of responsibilities, awareness raising and training of staff involved in processing operations, and the related audits;
3. To provide advice where requested as regards the data protection impact assessment and monitor its performance pursuant to Article 35 of Regulation (EU) 2016/679;
4. To cooperate with the supervisory authority;
5. To act as the contact point for the supervisory authority on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate, with regard to any other matter.
6. The DPO shall in the performance of her tasks have due regard to the risk associated with processing operations, taking into account the nature, scope, context and purposes of processing.

2.5 Transfer of data to non-EU/EEC country or international organisation, and safeguards

The data will be kept within LAGO project partners/researchers. None of the information you give will be transferred to non-EU/EEC countries.

2.6 What is the legal basis for the processing of your personal data?

In order to carry out the processing activities specified in the previous section, the LAGO project relies on:

- its legitimate interest of the data controller in securing the platform and to enable proper communication and exchange of information between you and the LAGO project;
- your consent, which you can withdraw at any time, without affecting the lawfulness of processing based thereon before its withdrawal, for the processing related to the following activities: the direct emailing of a newsletter to you following registration, if applicable (according to Article 6 par. 1 (a) and (f) GDPR.); access to the training platform and its content; direct contact via email by the platform administrators

2.7 How long do we keep your personal data?

The data we collect to ensure the security of this platform are not kept longer than one year. For the other above-mentioned purposes, your personal data will be kept for the duration of the LAGO project and for a 5-year period after its completion (until 31 August 2030, or later if extended) according to Article 20.1 of the LAGO Grant Agreement. In any case, personal data will be retained no longer as relevant to the purpose of their collection, unless you have explicitly consented to a shorter data retention period.



2.8 Who has access to your personal data and how are they protected?

IANUS Technologies Ltd., as the data controller, is the primary entity with access to your personal data. Access may also be granted to the LAGO project partners in charge of the training curricula and training activities, as well as some personnel of third parties, in charge of the hosting and maintenance of the training platform. All such recipients being located within the European Economic Area (EEA).

The Data Controller has implemented technical measures including 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. For further protection, organisational measures also apply, restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

The online training platform, which is provided by Moodle, as explained in Section 2, is hosted under Top.Host (<https://top.host/>). Top.Host an online website providing products and services through the internet, founded by ENARTIA Single Member S.A. which is based on Heraklion of Crete, at STEP C /FORTH, 100 Nikolaou Plastira str., Vassilika Vouton, 70013, Greece. Top.Host provides web services, such as web hosting, reseller hosting, dedicated servers, domain names registration services, SSL certificates and other related services.

The data subjects of Top.Host have the following rights: (a) the right of access (learning which dates Top.Host is processing, for what reasons and its recipients), (b) the right of amendment (rectifying any inaccuracies or lack of data), the right of deletion or right of oblivion (purge from Top.Host files, should their presence no longer be necessary), (c) the right of restricting processing (in case of doubt being presented so as to the accuracy of the data), (d) the right of portability (for the data subject to receive their data at a structured and commonly used format. Should the data subject exercise any of those rights, Top.Host shall undertake any possible means for the satisfactory conclusion of such a request within thirty (30) days from receiving the relevant request, after Top.Host notifies such either for its execution or the subjective reasons which prevent it.

Top.Host, as the controller, only uses processors that provide reasonable assurance that appropriate technical and organizational measures will be in place to ensure that the processing meets the requirements of EU Regulation 2016/679 and any other applicable European and national legislation, and safeguards the rights of the data subjects.

Top.Host, as the processor, does not engage another processor without the prior written permission of the controller, and the granting of a general license for this purpose is presumed by accepting the Terms of Use and the purchase of any service. In this case, Top.Host shall inform the controller of any intended changes to add or replace the other processors, thereby giving the controller the opportunity to object to such changes.

Processing by the processor, a partner of the Top.Host, is governed by a contract or other legal act under the law of the Union or the Member State which binds the processor in relation to Top.Host and determines the subject matter and duration of processing, the nature and purpose of the processing, the type of personal data and the categories of data subjects and the controller's obligations and rights. The processor:

1. processes personal data only on the basis of documented instructions of Top.Host as a controller, including with regard to transfers of personal data to a third country or international



organization, unless it is required to do so under Union law or the law of the Member State to which the processor is a subject. In this case, the processor shall inform the controller of this legal claim in question prior to processing, unless that law prohibits such information on important grounds of public interest;

2. ensures that persons authorized to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality;
3. takes all necessary measures pursuant to Article 32 of (EU) Regulation No 2016/679,
4. complies with the conditions set out above for the recruitment of another processor,
5. taking into account the nature of the processing, assists the controller with the appropriate technical and organizational measures, to the extent possible, for the fulfilment of the controller's obligation to respond to requests for exercising the data subject's rights laid down in EU Regulation 2016/679;
6. assists the controller in ensuring compliance with the obligations pursuant to EU Regulation 2016/679 Articles 32 to 36, taking into account the nature of processing and the information available to the processor;
7. at the choice of the controller, deletes or returns all the personal data to the controller after the end of the provision of services relating to processing, and deletes existing copies unless Union or Member State law requires storage of the personal data;
8. makes available to the controller all information necessary to demonstrate compliance with the obligations laid down in this Article and allow for and contribute to audits, including inspections, conducted by the controller or another auditor mandated by the controller.

As regards point (8) of the first subparagraph, the processor shall immediately inform the controller if, in his opinion, an instruction infringes this Regulation or other Union or Member State data protection provisions.

Where a processor engages another processor for carrying out specific processing activities on behalf of the Company as a controller, the same data protection obligations as set out in the contract or other legal act between the Company as the controller and the processor, as provided for in paragraph 3, shall be imposed on the other processor by a contract or other legal act in accordance with the law of the Union or of the Member State, especially to provide sufficient assurances to implement appropriate technical and organizational measures in order processing meets the requirements of this Regulation. When the other processor fails to meet data protection obligations, the initial processor remains fully accountable to the Company as the controller for the fulfilment of the obligations of the other processor.

For whichever issue involving the processing of the data of a data subject, he or she may contact the Data Protection Officer at dpo@enartia.com.



2.9 What rights do you have, and what does your right of withdrawal include?

Concerning the personal data processed by the LAGO project, participants have the following statutory rights under the GDPR:

Table 1. User GDPR rights

No.	My rights	GDPR Article
1	You can withdraw your consent from the LAGO project for its processing of your personal data at any time.	Article 7
2	You can request access to your personal data processed by the LAGO project, and information about the processing.	Article 15
3	You can request that any inaccurate personal data be rectified, and amendments be processed without undue delay. Similarly, you can complete any incomplete personal data and can provide a supplementary statement if you wish.	Article 16
4	You have the right to be 'forgotten' by requesting that my personal data be erased.	Article 17
5	You can request that the processing of your personal data be restricted in certain circumstances, such as where you contest its: accuracy; lawfulness; or that the processing of your personal data is no longer necessary for the purposes your consented to.	Article 18
6	You have the right to receive the personal data that you have provided to the LAGO project in a structured, commonly used, machine readable format, where the project has processed this data in an automated way.	Article 20
7	You have right to lodge a complaint with a supervisory authority.	Article 57

If at any time you wish to learn more about and/or exercise any of the above rights, you should contact the Data Protection Officer (DPO) of IANUS, Alexia Solomou (LLB, LLM), International & EU Law Expert, a.solomou@ianus-technologies.com.

You are also free to withdraw your consent to the processing of your data at any time without providing a reason for your decision. Your decision to withdraw your consent will not have any negative impact. In the case of withdrawal, personal data will be immediately deleted and no longer be processed by the LAGO project. Please note that personal information that was anonymised during the project cannot identify you and, therefore, will not be deleted. For withdrawal, please contact: Evangelos Michos, Researcher at IANUS: e.michos@ianus-technologies.com.

2.10 External sites

The training platform may link to external sites (LinkedIn, X, ZENODO etc.) that are not operated by us. Please be aware that we have no control over the content and practices of these sites, and cannot accept responsibility or liability for their respective privacy policies. For further information regarding these sites, we strongly suggest you visit each external site's privacy and cookie policies.

2.10.1 Data protection provisions about the LinkedIn external site

The Controller has integrated components of the LinkedIn Corporation on this platform. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts.

The operating project consortium of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES, LinkedIn



Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible. With each call-up to one of the individual pages of this platform, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the Data Subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn.

LinkedIn receives information via the LinkedIn component that the Data Subject has visited our platform, provided that the Data Subject is logged in at LinkedIn at the time of the call-up to our platform. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the Data Subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our platform is made. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available at <https://www.linkedin.com/legal/cookie-policy>.

2.10.2 Data protection provisions about the X (formerly Twitter) external site

On this platform, the controller has integrated components of X. X is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 140 characters. These short messages are available for everyone, including those who are not logged on to X. The tweets are also displayed to so-called followers of the respective user. Followers are other X users who follow a user's tweets. Furthermore, X allows you to address a wide audience via hashtags, links or retweets.

The operating project consortium of X is X, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES. With each call-up to one of the individual pages of this platform, which is operated by the controller and on which a X component (X button) was integrated, the Internet browser on the information technology system of the Data Subject is automatically prompted to download a display of the corresponding X component of X. The purpose of the integration of the X component is a retransmission of the contents of this platform to allow our users to introduce this web page to the digital world and increase our visitor numbers.

X receives information via the X component that the Data Subject has visited our platform, provided that the Data Subject is logged in on X at the time of the call-up to our platform. This occurs regardless of whether the person clicks on the X component or not. If such a transmission of information to X is not desirable for the Data Subject, then he or she may prevent this by logging off from their X account before a call-up to our platform is made. The applicable data protection provisions of X may be accessed at <https://twitter.com/en/privacy>.

2.10.3 Data protection provisions about the ZENODO external site

The Controller has integrated components of Zenodo on this platform. Zenodo is an open-access repository that enables researchers to share and preserve research outputs in a wide range of formats including publications and data sets.

The operating project consortium of Zenodo is CERN, the European Organization for Nuclear Research, based in Geneva, Switzerland. With each call-up to one of the individual pages of this platform, which is operated by the controller and on which a Zenodo component (Zenodo button) was



integrated, the Internet browser on the information technology system of the Data Subject is automatically prompted to download a display of the corresponding Zenodo component of Zenodo.

Zenodo receives information via the Zenodo component that the Data Subject has visited our platform, provided that the Data Subject is logged in on Zenodo at the time of the call-up to our platform. This occurs regardless of whether the person clicks on the Zenodo button or not. If such a transmission of information to Zenodo is not desirable for the Data Subject, then he or she may prevent this by logging off from their Zenodo account before a call-up to our platform is made.

The applicable data protection provisions of Zenodo may be accessed at <https://about.zenodo.org/policies/privacy-policy/>. The Zenodo Cookie Policy is available at <https://about.zenodo.org/policies/cookie-policy/>.

2.11 Cookie Policy

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the site or a third-party to recognise you and make your next visit easier and the site more useful to you. Essentially, cookies are a user's identification card for the Moodle servers. Web beacons are small graphic files linked to our servers that allow us to track your use of our site and related functionalities. Cookies and web beacons allow us to serve you better and more efficiently, and to personalise your experience on our site. Cookies can be "persistent" or "session" cookies. Moodle uses or may use cookies and/or web beacons to help determine and identify repeat visitors, the type of content and sites to which a user of our site links, the length of time each user spends on any particular area of the site, and the specific functionalities that users choose to use. To the extent that cookie data constitutes personally identifiable information, we process such data on the basis of your consent. Moodle uses both session and persistent cookies on the site and we use different types of cookies to run the site²:

- **Essential cookies.** Necessary for the operation of the site. We may use essential cookies to authenticate users, prevent fraudulent use of user accounts, or offer site features.
- **Analytical/performance cookies.** Allow us to recognise and count the number of visitors and see how visitors move around the site when using it. This helps us improve the way the site works.
- **Functionality cookies.** Used to recognise you when you return to the site. This enables us to personalise our content for you, greet you by name, and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** Record your visit to the site, the pages you have visited, and the links you have followed. We will use this information to make the site more relevant to your interests. We may also share this information with third parties for this purpose.

In addition to our own cookies, Moodle may also use various third-party cookies to report usage statistics of the Site and refine marketing efforts.

² To learn more about Moodle's Cookie Policy, you can access the following link [Policies and agreements | Moodle.org](#).



- **Tracking cookies.** Follow on-site behaviour and tie it to other metrics allowing better understanding of usage habits.
- **Optimization cookies.** Allow real-time tracking of user conversion from different marketing channels to evaluate their effectiveness.
- **Partner cookies.** Provide marketing conversion metrics to our partners so they can optimize their paid marketing efforts.

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser. Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use some or all of the features LAGO offers. You may not be able to log in, store your preferences, and some of our pages might not display properly.

Table 2. Moodle cookies table

No.	Purpose	Expiration	More Information
MoodleSession	You must allow this cookie into your browser to provide continuity and maintain your login from page to page.	When you log out or close the browser this cookie is destroyed (in your browser and on the server).	
MOODLEID	It remembers your username within the browser. This means when you return to this site the username field on the login page will be already filled out for you.		It is safe to refuse this cookie - you will just have to retype your username every time you log in.

Table 3. Third Party Cookies table

No.	Purpose	More information
__cfduid	Cloudflare: used to identify individual clients behind a shared IP address and apply security settings on a per-client basis	https://support.cloudflare.com/hc/en-us/articles/200170156-What-does-the-Cloudflare-cfduid-cookie-do-
__utma	Google Analytics: stores the amount of visits (for each visitor), the time of the first visit, the previous visit, and the current visit	-
_utmb	Google Analytics: used to check approximately how fast people leave: when a visit starts, and approximately ends	-
__utmc	Google Analytics: used to check approximately how fast people leave: when a visit starts, and approximately ends	-
__utmt	-	-

__utmz	Google Analytics: records whether the visitor came from a search engine (and if so, the search keyword used), a link, or from no previous page (e.g. a bookmark)	https://helpful.knoobsdials.com/index.php/Utma,_utmb,_utmz_cookies
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3 Consent

By logging in the online platform, users are automatically consenting to the following:

- I have carefully read and understood the information described in detail in Sections 1 and 2.
- I am fully aware of all my rights and especially my right to withdraw this consent, at any time, without consequences, by sending an e-mail to Evangelos Michos, Researcher at IANUS Technologies, e.michos@ianus-technologies.com.
- My participation in the online platform and the training activities of LAGO is voluntary, and I have not been pressured or coerced in any way to participate in this research.
- I am free to end my participation at any time with no negative consequences.
- I have read the information explaining the project and understand how this research activity will collect and process my views.
- I have the right to ask questions about my participation and receive clear answers before making any decision.
- Information will be securely stored and kept separately from the opinions I express.
- My views will be analysed by researchers who do not have access to my name. Information about me will be destroyed when they are no longer needed and in any case five years after the end of the project (whichever is sooner).
- My personal data will be stored securely.
- The results of this research activity might be included in the writing of a piece of work to be delivered to the European Commission, or scientific research paper. This could include reporting my profession, my position in my organisation, my affiliation, and my country.
- I have been made aware of my rights regarding my personal data and how to exercise them.
- I have been given the contact details of the research team and I have been informed that I am free to contact them with any queries about the research or the project.
- I acknowledge that all data provided will be processed until the end of the project.

