



SPARKLE Privacy Policy

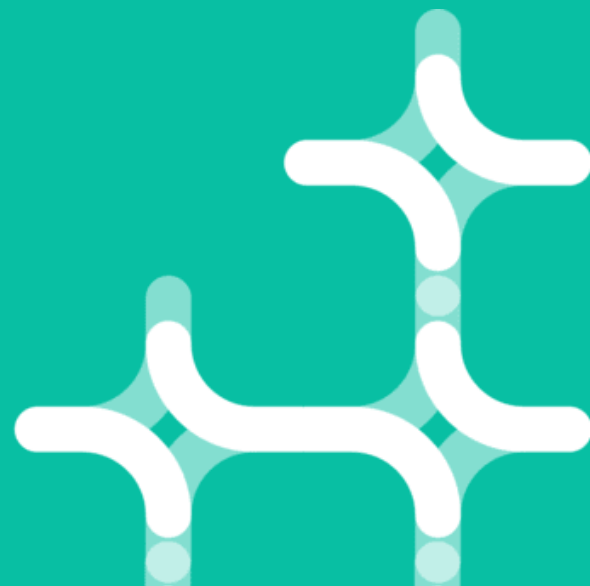
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Table of Contents

SPARKLE PRIVACY POLICY	1
PROJECT INFORMATION	3
DISCLAIMER	3
STATEMENT OF ORIGINALITY	3
HOW WE COLLECT YOUR PERSONAL DATA	4
WHAT KIND OF PERSONAL DATA WE COLLECT, STORE AND PROCESS	4
WHAT DO WE USE AND PROCESS YOUR PERSONAL DATA FOR	5
WHERE AND HOW LONG WILL YOUR DATA BE STORED?	5
DATA SECURITY	5
WHAT ARE YOUR DATA PROTECTION RIGHTS?	6
HOW CAN YOU EXERCISE THESE RIGHTS?	7
FILING A COMPLAINT WITH A SUPERVISORY AUTHORITY	8
CHANGES TO OUR PRIVACY POLICY	8
HOW TO CONTACT US	8
WEBSITE	9
PARTNERS	9



Project information

Project name: SPARKLE

Grant agreement number: 101167580

Project duration: 2024-2028

Project coordinator: Anna Francis, Energy Cities

Address: 4 Chemin du Fort de Bregille, 25000 Besançon (France)

Disclaimer

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It does not reflect the opinion of the European Union.

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Statement of originality

This deliverable contains original unpublished work except where clearly indicated otherwise. Acknowledgement of previously published material and of the work of others has been made through appropriate citation, quotation or both.

In compliance with the General Data Protection Regulation (GDPR) and other legislation in force applicable to the protection of personal data, we have drawn up this privacy policy to provide you with information on the personal data compiled and how we use the data and with which purpose.

The Project “SPARKLE – Sustainable Planning and Resilience Knowledge Learning Environment” – from now on “SPARKLE” – is a European funded project under the European Union’s LIFE programme, with Grant Agreement no: 101167580.

Complying with the rules set by this programme, as well as the applicable legislation and regulation, we ensure the total security and confidentiality of your data, which are processed with the sole and exclusive purpose of providing information and disclosing initiatives strictly related to the project activities.

The below privacy policy explains how the project consortium, under the coordination of the project coordinator and partner responsible for communication, Energy Cities (Association Loi de 1901, 4 chemin du Fort de Bregille, F-25000 Besançon) (« we », « us ») may collect, store, and process your personal data, for which purpose, and what are your data protection rights.

HOW WE COLLECT YOUR PERSONAL DATA

- We collect your personal data when you subscribe to our newsletters and mailing lists and when you register to our events.
- We may collect your personal data when you participate to any other activity and event we organise.
- We may collect your personal data from public sources online in the public domain, whenever your professional activity is directly linked to SPARKLE’s activities and working topics.

WHAT KIND OF PERSONAL DATA WE COLLECT, STORE AND PROCESS

The personal data we may collect, store and process are: your name and surname, your gender, your email address, your phone number, your job position and organisation, and your professional postal address.

WHAT DO WE USE AND PROCESS YOUR PERSONAL DATA FOR

We may use your personal data in order to:

- send you emailing on our project's activities;
- send you the project newsletter;
- send you direct targeted emailing for the promotion of our events, projects and new publications related to the project topic.

This data processing is legally based on your consent, and on our legitimate interest when hosting an event.

When you register online to our events, the data you provide on our registration forms are used by us to manage your registration and to enable us to communicate with you for the purpose of the event. Your name and surname, job position, organisation and country will be included in the list of participants that is distributed during the event. We do not add your phone number or email address in our events' list of participants. You can unsubscribe from our newsletters and mailing list at any time, using the subscription link that you will find in every issue of our newsletter and in the footer of every message that you receive from our mailing lists.

Your data might be shared with the European Commission and the European Climate, Infrastructure and Environment Executive Agency (CINEA) staff in charge of the management of EU funded grants and their contractors for ex-post controls. Under no circumstances do we share your personal data with other organisations, except if a competent authority demands it or if we have your express permission.

WHERE AND HOW LONG WILL YOUR DATA BE STORED?

Your personal data will be saved for as long as it will be used for the purpose you agreed to, or until you notify us at data@energy-cities.eu

Your data is stored on a server of our sub-contractor FC-Net (6, rue Gérard Manton, F-25000 Besançon) and on Energy Cities CRM system, OHME (47 Rue de Paradis, 75010 Paris). Both companies are based in France and stores their data in France. Your personal information will not be stored out of the European economic area, not even in a cloud.

DATA SECURITY

We place the highest priority on the security of your personal data. We are dedicated to safeguarding your information and ensuring its confidentiality, integrity, and availability.

To achieve this, we have implemented rigorous security measures that adhere to the field's best practices and standards.

WHAT ARE YOUR DATA PROTECTION RIGHTS?

In accordance with the French Data Protection Act and the GDPR, you have the following rights:

Right of access (Article 15 GDPR):

You have the right to request confirmation as to whether or not personal data concerning you is being processed.

You may request a copy of your personal data undergoing processing, as well as certain information regarding the purposes of the processing, the types of data processed, the recipients of this data, the retention period, the sources of this data, the existence of any profiling activities, and your rights related to these processing activities.

Right to rectification (Article 16 GDPR):

You have the right to have inaccurate personal data concerning you rectified without undue delay.

You may also request the completion of incomplete personal data, including by providing a supplementary statement.

Right to erasure, or right to be forgotten (Article 17 GDPR):

You may request the erasure of your personal data under certain circumstances, such as when the data is no longer necessary for the purposes for which it was collected, when the processing is unlawful, if you withdraw your consent and there is no other legal basis for the processing, or if you object to the processing and there are no overriding legitimate grounds for the processing.

Right to restriction of processing (Article 18 GDPR):

You have the right to request the restriction of processing of your personal data instead of deletion in certain situations, such as when the accuracy of the data is contested, when the processing is unlawful, or when you have objected to the processing.

Right to data portability (Article 20 GDPR):

You have the right to receive the personal data concerning you that you have provided to a data controller, in a structured, commonly used, and machine-readable format. You also have the right to transmit this data to another data controller without obstruction from the original data controller.

Right to object (Article 21 GDPR):

You have the right to object, on grounds relating to your particular situation, to the processing of personal data concerning you, particularly when the processing is based

on the legal grounds of the data controller's legitimate interest, or in the context of processing for direct marketing purposes. The data will not be deleted, but the data controller will no longer be able to carry out the processing to which you have objected.

Rights related to automated decision-making, including profiling (Article 22 GDPR):

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Right to withdraw consent at any time (Article 13-2c GDPR):

For processing activities based on consent, you have the right to withdraw your consent at any time without affecting the lawfulness of processing based on consent before its withdrawal.

HOW CAN YOU EXERCISE THESE RIGHTS?

You can submit your requests to exercise your rights using the following contact details:

- By email sent to data@energy-cities.eu
- By postal mail addressed to Energy Cities, 4 chemin du Fort de Bregille, 25000 BESANCON, France.

Your request must include the following elements:

Clear identification of the individual:

- Full name and first name of the person making the request.
- Any other identifier used to interact with the organization (e.g., customer number or username).
- Note: In case of reasonable doubt about your identity, you may be asked to provide additional information to prove your identity. In some cases, a copy of an identification document may be necessary.

Contact information:

- Email address or phone number to allow the organization to respond to the request.
- Postal address, if necessary for the delivery of documents.

Specific details of the request:

- Clear indication of the right the person wishes to exercise (e.g., access, rectification, erasure, etc.).
- Precise description of the personal data concerned, if possible.

Preferences for receiving the response:

- Indicate how the person wishes to receive the response (e.g., by email, postal mail).

Date and signature:

- The request must be dated and, if submitted in physical or digital form, signed by the person concerned.

FILING A COMPLAINT WITH A SUPERVISORY AUTHORITY

If you consider we have not complied with data protection regulation, please inform us at data@energy-cities.eu.

If you believe that the processing of your personal data infringes current regulations, you also have the right to lodge a complaint with the French data protection authority (CNIL).

An online service for filing a complaint is available at the following address:

<https://www.cnil.fr/fr/plaintes>

CHANGES TO OUR PRIVACY POLICY

We keep our privacy policy under regular review and we will place any updates on this web page. This version has been published on 22 January 2025.

HOW TO CONTACT US

Please contact us at data@energy-cities.eu if you have any questions about our privacy policy or information we hold about you.

For more information

Website

www.energy-cities.eu/sparkle

PARTNERS



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