

Personal Data Protection and Processing Information – LIFE4EPR

1. Controller Identity and Regulatory Framework

Within the framework of the LIFE4EPR project, personal data are processed in accordance with Regulation (EU) 2016/679 (General Data Protection Regulation – “GDPR”), applicable national data protection legislation, and the obligations arising from the LIFE4EPR Grant Agreement.

For the purposes of data processing carried out through the website <https://life4epr.ent.cat/> (hereinafter the “Website”), the Data Controller is the LIFE4EPR Project consortium according to the project Grant Agreement. The subsidiary responsible as project leader is: **Fundación ENT** C/ Sant Joan, 5 - 08800 Vilanova i la Geltrú (Barcelona), Spain- Email: info@ent.cat.

Fundación ENT acts as Coordinating Beneficiary of the LIFE4EPR project and determines the purposes and means of processing personal data collected via the Website and related project activities.

Where personal data are processed jointly by members of the LIFE4EPR consortium for project implementation, such processing is carried out under the framework defined by the Grant Agreement and internal consortium arrangements, in compliance with Article 26 GDPR where applicable.

2. Scope of Processing

This Privacy Policy applies to all personal data collected through:

- Contact forms on the Website;
- Newsletter subscriptions;
- Event registrations;
- Surveys conducted during the project;
- Participation in ExPeRt community activities;
- Technical data generated through browsing (e.g., IP address, access logs, security logs).

Processing activities are carried out in accordance with the principles set out in Article 5 GDPR, including lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, and confidentiality.

3. Purpose of Processing

Personal data are processed exclusively for purposes strictly related to the implementation, management, dissemination, and reporting obligations of the LIFE4EPR project.

These purposes include:

- Responding to user enquiries;
- Managing stakeholder engagement and surveys;
- Organising project events and expert activities;
- Disseminating project results and communications;
- Ensuring the security, integrity, and technical functioning of the Website;
- Complying with administrative, monitoring, audit, and reporting obligations towards the European Commission and other competent authorities.

Personal data are not processed for commercial purposes and are not used for marketing activities.

Only personal data that are adequate, relevant, and limited to what is necessary for the above purposes are collected. No special categories of personal data (Article 9 GDPR) are intentionally requested.

4. Legal Basis for Processing

Personal data are processed on the following legal grounds under Article 6 GDPR:

- **Article 6(1)(a) – Consent**, where users voluntarily provide their data (e.g., surveys, newsletters, event registrations);
- **Article 6(1)(c) – Legal obligation**, where processing is necessary to comply with obligations under the LIFE4EPR Grant Agreement and applicable EU regulations;
- **Article 6(1)(f) – Legitimate interest**, limited to ensuring website security, fraud prevention, and system integrity.

Where processing is based on consent, data subjects may withdraw their consent at any time without affecting the lawfulness of processing carried out prior to withdrawal.

5. Categories of Recipients

Access to personal data is restricted to:

- Authorised personnel of Fundació ENT involved in project implementation;

- Authorised members of the LIFE4EPR consortium, where strictly necessary for project-related activities;
- Data processors (e.g., hosting providers, IT service providers) acting under written agreements in accordance with Article 28 GDPR;
- Public authorities or EU bodies where required by law or under audit obligations.

Personal data are never sold, transferred for marketing purposes, or disclosed to unauthorised third parties.

6. International Data Transfers

Personal data are processed within the European Economic Area (EEA).

If, exceptionally, personal data are transferred outside the EEA, such transfers will be carried out only in compliance with Chapter V GDPR, including adequacy decisions or appropriate safeguards such as Standard Contractual Clauses.

7. Data Retention Period

Personal data are retained only for the time necessary to fulfil the purposes described above and to comply with EU funding and audit requirements.

Unless otherwise required by applicable law, personal data will be retained for a maximum of five (5) years after the official end date of the LIFE4EPR project (30 April 2027), in line with document retention obligations under EU grant rules.

After this period, personal data will be securely deleted or anonymised.

8. Data Subject Rights

In accordance with Articles 15–22 GDPR, data subjects have the right to:

- Obtain confirmation as to whether their personal data are being processed;
- Access their personal data;
- Request rectification of inaccurate data;
- Request erasure (“right to be forgotten”), where applicable;
- Request restriction of processing;
- Object to processing based on legitimate interest;
- Request data portability, where applicable;
- Withdraw consent at any time;
- Lodge a complaint with the competent supervisory authority.

Requests may be submitted to: **info@ent.cat**

The Data Controller will respond within the time limits established by the GDPR.

9. Security Measures

Appropriate technical and organisational measures are implemented to ensure a level of security appropriate to the risk, including measures designed to protect personal data against unauthorised access, alteration, disclosure, or destruction.

Access to personal data is restricted to authorised personnel and subject to confidentiality obligations.

10. Informed Consent

Where required, participation in surveys, events, or stakeholder engagement activities implies the provision of informed consent to the processing of personal data for the specific purposes described in this Policy.

By providing consent, you confirm that:

- You have read and understood this Privacy Policy;
- You are aware of the nature and purpose of the LIFE4EPR project;
- You understand that technical or aggregated results may be published without identifying you;
- You understand that your personal data will be stored securely and deleted in accordance with the retention period described above;
- You accept that communications within the LIFE4EPR project will be conducted in English.

For any questions or to withdraw your consent, please contact: info@ent.cat.