

## **Privacy Policy for our CRM system**

Date of last revision: 14.06.2022

### **Introduction to our Privacy Policy**

1. This privacy policy provides information about what kind of "personal data" we, the Gaia-X European Association for Data and Cloud AISBL, collect and hold in our Customer Relationship Management ("CRM") system, how and for what purpose we collect and store this information, how you can access it and some other important matters.
2. This policy applies to the personal information that we collect and further process in our CRM system.

### **Purposes for which we collect, hold, use and disclose personal information**

3. We collect, hold, use and disclose personal information in order to:
  - (a) Operate, maintain and support our CRM system.
  - (b) Store and process personal information in our CRM system.
  - (c) Use personal information to send you the Gaia-X newsletter if you subscribed.
  - (d) Comply with our legal and regulatory obligations.
  - (e) Any other reason with your consent to the disclosure or for which we provide you with the required notice.

### **What kind of information do we collect and for what purpose?**

4. The key data that we store may include:
  - First and last name
  - Job Title
  - Email address
  - Phone numbers (company phone and/or mobile number)
  - Company name and contact details
  - Nationality
  - Working Group Membership
  - AISBL Member Status
  - Gaia-X Hub Preferences / Interests

- Nextcloud ID
- Communication with you (emails, meeting memos, etc.)

Please note that this list is not exhaustive.

5. The reasons for why the above broad categories of personal information are collected are explained below:

- (f) We use your personal, company, Working Group Membership and AISBL Member Status information for administrative purposes for the further organisation and collaboration of Gaia-X and its hubs.
- (g) We use your personal and company information to contact you regarding operational processes on the Platform.
- (h) We use your company information for press releases, if you sent us your marketing and logo materials.
- (i) We use your email information (this includes your name and email address) to send periodic emails regarding products, services, general information about Gaia-X as well as for marketing purposes if you subscribed to the Gaia-X newsletter.

#### **What is the legal basis for our collection and further processing of your personal information?**

6. We collect and process personal information from you:

- (j) Where we have your consent according to Art. 6 Sec. 1 S. 1 lit. a) GDPR
- (k) Where the processing is in our legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms according to Art. 6 Sec. 1 S. 1 lit f) GDPR. Our legitimate interests may include contacting you for direct marketing, and for operational processes within the CRM system.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the "How to contact us" heading below.

#### **How do we collect personal information?**

7. We collect personal information in several ways:

- (l) Directly from you: when you provide this to us directly, such as by registering on our Nextcloud Digital Collaboration Platform (Nextcloud DCP), by subscribing to a newsletter or by filling out a form.
- (m) From former data pools / hubs: We store transferred data from former data pools / hubs to the SuperOffice CRM if you have agreed to the data transfer.

(n) From third parties: when third parties provide information to us in relation to you, such as in the context of transactions that are facilitated via the Platform and/or where you authorise us to receive information on your behalf.

#### **How do we hold information?**

8. We hold personal information that we collect electronically on SuperOffice's servers in Norway and within the EU. More information about the server sites are available under <https://www.superoffice.com/trust-center/transparency/>

#### **How long do we hold information?**

9. We hold personal information for as long as necessary for the purposes for which we collected the information. We may retain your personal information for a longer period of time where this is necessary to comply with our legal obligations, or where this is necessary to protect our interests.

10. Where we decide that it is no longer necessary to hold your personal information, we will delete this from our secure servers. Personal information in hard copy format will be shredded and disposed of using secure document management services.

#### **How do we keep your personal information secure?**

11. SuperOffice uses appropriate technical and organisational measures to protect the personal information that we collect and process about you. SuperOffice also assists us in fulfilling the requirements set by the GDPR. The measures SuperOffice uses are designed to provide a level of security appropriate to the risk of processing your personal information.

#### **Who do we share your personal information with?**

12. We may disclose your personal information to our employees and third party services providers engaged by us in order to help us fulfil the purposes for processing personal information outlined in clause 3 above.

13. We may disclose your personal information to SuperOffice's employees in order to maintain the software.

14. Where we provide your personal information to third parties, we require them to protect any private and confidential information that we may provide to them. We also contractually require them to have appropriate controls and processes in place, to maintain the security of such information. All our employees have executed confidentiality agreements.

15. We may disclose your personal information where this is required to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of legal proceedings and/or in response to a request from a law enforcement agency.

16. We may share anonymised and aggregated information for improving our service.

## Your data protection rights

17. You have the following data protection rights:

(o) If you wish to **access, correct, update or request deletion** of your personal information, you can do so at any time by contacting us using the contact details provided under the “How to contact us” heading at the end of this policy (Art. 16 and 17 GDPR).

(p) In addition, you can **object to processing** of your personal information, ask us to **restrict processing** of your personal information (Art. 18 GDPR) or **request portability** of your personal information (Art. 20 GDPR). Again, you can exercise these rights by contacting us using the contact details provided under the “How to contact us” heading at the end of this policy.

(q) You have the right to **opt-out of marketing communications / newsletter** we send you at any time. You can exercise this right by clicking on the “unsubscribe” link in the e-mails we send you or by emailing us to [info@gaia-x.eu](mailto:info@gaia-x.eu). To opt-out of other forms of marketing (such as postal marketing or telemarketing), then please contact us using the contact details provided under the “How to contact us” heading at the end of this policy.

(r) Similarly, if we have collected and process your personal information with your consent, then you can **withdraw your consent** at any time (Art. 21 GDPR) by contacting us using the contact details provided under the “How to contact us” heading at the end of this policy. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.

(s) You have the **right to complain to a data protection authority** about our collection and use of your personal information. For more information, please contact your local data protection authority.

18. We respond to all requests we receive from individuals wishing to exercise their data protection rights in accordance with applicable data protection laws.

## How to contact us

19. We take our privacy obligations very seriously. If you have any questions, concerns or think that we may have breached our privacy law obligations, we ask that you tell us by sending an email using the contact details set out below.

20. If you have any concerns or think that we may have breached our privacy law obligations, we ask that you explain your reasons in detail. We will investigate and aim to respond as soon as possible. We will try and work with you to resolve any concerns or dispute.

21. Please feel free to contact us through one of the following methods:  
Gaia-X European Association for Data and Cloud AISBL  
Avenue des Arts, 6-9  
1210 Brussels / Belgium

## Changes to the Privacy Policy

22. We may amend this policy from time to time, by publishing a new version on our website. You can see the date of the last revision at the beginning of this policy.
23. All information held by us is governed by the latest version of this policy.

## Definitions

24. In this policy, the following terms have the meaning set out below.

Term	Meaning
GDPR	European Union General Data Protection Regulation 2016/679.
personal data	Means personal data for the purposes of the GDPR.  <i>[‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.]</i>
Platform	The online Nextcloud DCP platform operated by us.
you or your	You and your agents, contractors, directors, employees, representatives, and any other entity or person otherwise acting on your behalf.
we, our or us	Gaia-X European Association for Data and Cloud AISBL Avenue des Arts, 6-9 1210 Brussels / Belgium