

Privacy Statement regarding the protection of Personal data in the context of the “SEEWQCI” Newsletter

The SEEWQCI (South-East Europe to Western Europe Quantum Communication Infrastructure GR – CY – BG – NL) project aims to create a cross-border quantum communications network between Greece, Cyprus, Bulgaria and the Netherlands.

SEEWQCI Project – (Grant Agreement Number 101249531) is co-funded by Connecting Europe Facility (CEF) Programme, the EuroQCI EU funding initiative. Coordinated by the National Infrastructures for Research and Technology S.A., (GRNET), and joined by 4 EU Member States, SEEWQCI marks the evolution of National Quantum Communication Infrastructures (NatQCI) from domestic capability toward fully operational cross-border services.

SEEWQCI’s goal is to develop a resilient quantum network to ensure the secure transmission of sensitive data between government agencies, research institutions, and critical infrastructure.

Partners/Joint Controllers (hereinafter referred to as “the Consortium”):

Can be found [here](#) [link to project partners page]

Data Controller details:

The controller for the processing of personal data in the context of the SEEWQCI newsletter is the SEEWQCI Consortium, coordinated by the the National Infrastructures for Research and Technology S.A., (GRNET).

Within the Consortium, National Infrastructures for Research and Technology (GRNET) acts as designated joint controller for the implementation and day to day management of the SEEWQCI newsletter on behalf of the Consortium.

Data Controller’s Contact Details:

- General contact for the SEEWQCI Consortium regarding the newsletter : contact@seewqci.eu
- Operational contact for this processing of personal data for the SEEWQCI Newsletter : GRNET’s Marketing & Communication Department - marcomms@grnet.gr

Data Processor:

«Moosend Ltd»

More detailed information for each application from the other, the Terms of Use and Protection of the required applications in its application:

<https://moosend.com/trust/privacy-policy/>

Scope of this Privacy Statement:

National Infrastructures for Technology and Research S.A. (hereinafter referred to as “GRNET SA”) acting as designated joint controller for the SEEWQCI newsletter on behalf of the SEEWQCI Consortium coordinated by GRNET, is bound by the European Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – hereinafter referred to as “the GDPR”) and of the Council of 27 April 2016 General Data Protection Regulation and by the applicable national legislation on data protection and privacy.

This Privacy Statement details all information necessary for the processing of personal data for the SEEWQCI Newsletter. It sets out the criteria as well as the terms and conditions under which the SEEWQCI Consortium, acting through GRNET SA for this processing, collects, processes, uses, stores and transmits the personal data of those who subscribe to the SEEWQCI Newsletter, how it ensures the confidentiality of such information, in compliance with Union and national legislation on personal data protection and electronic privacy.

For the purposes of this Privacy Statement, the terms “data processor”, “data controller”, “third party”, “supervising authority”, “personal data”, “processing”, “data subject” shall have the meaning ascribed to them by applicable legislation on the protection of personal data.

In addition, for the purposes of the present, the following definitions shall also apply:

“**Website**” – the website accessible via domain names <https://seewqci.eu/>, including the entirety of the web pages thereof.

“**Subscriber**” – the SEEWQCI Newsletter subscriber, whom the data refer to, whose identity is known or may be verified, namely it may be directly or indirectly determined.

A. Purpose/s for processing the data collected:

The SEEWQCI Consortium, acting through GRNET SA for the implementation of the SEEWQCI newsletter, collects and processes the personal data of those who give their consent for subscribing to the SEEWQCI Newsletter, for the following purposes :

- sending by email information material related to the SEEWQCI project, such as news, announcements, services, calls to action and events, to those who subscribed to the newsletter ;
- ensuring the sending and technical support of the newsletter by the executor “Moosend Ltd”.

B. Categories of personal data processed:

In the context of subscribing to the SEEWQCI Newsletter, the personal data that are being processed are:

- First Name
- Surname

- Email address
- Name of Company / Organisation
- Organisation Type (selection from drop down menu: Public Sector, Private Company, Consortium Partner, Supporting Organisation, Other)
- Timestamp of subscribing/logs of providing the consent.

As part of the technical support from the data processor, the personal data being processed are:

- First Name
- Surname
- Email address
- Name of Company / Organisation
- Organisation Type ((selection from drop down menu: Public Sector, Private Company, Consortium Partner, Supporting Organisation, Other)
- History of emails that have been sent
- Timestamp of subscribing/logs of providing the consent.

The SEEWQCI Consortium acting through GRNET SA, collects and processes the aforementioned data solely for the purposes mentioned above and only to the extent strictly necessary to effectively serve such purposes. These data shall be relevant, appropriate and not more than those required in view of the aforementioned purposes. They shall also be accurate and, if necessary, updated.

The data are retained only for the period required to achieve the purposes of their collection and processing and are deleted at the end of that period, as described below in the section “Retention period of personal data”.

C. Legal bases for processing

The processing of “subscribers” personal data is based on the consent of the data subjects, as required by Article 6 par. 1 par. A of GDPR.

D. Access to personal data:

For the implementation of sending the SEEWQCI Newsletter access to the personal data of the “subscribers” is provided to the following:

- In the SEEWQCI management team of GRNET SA, which consists of staff that maintains a contractual relationship of project leasing and provision of services with GRNET SA. “Associates of GRNET SA”, who are bound by a private confidentiality agreement with GRNET SA and
- To staff of the company “Moosend Ltd” in case of technical support.

E. Recipients of collected personal data:

The SEEWQCI Consortium acting through GRNET SA does not transmit or disclose the collected personal data to any third party other than as expressly provided in this Privacy Statement.

The collected personal data may be disclosed or transmitted to governmental authorities and or law enforcement officials, only if necessary for the above mentioned purposes, in the context of enforcement of a court decision or a provision of law or if necessary to secure the legitimate interests of the SEEWQCI Consortium in compliance with the terms and conditions of applicable law.

F. Rights of data subject:

As regards the data processed in the context of the SEEWQCI Newsletter, the SEEWQCI Consortium, acting through GRNET SA takes all necessary measures so that each subscriber can exercise their rights under the applicable data protection legislation, under the conditions set out below and in accordance with the law.

Right of Access: The data subject has the right to request and obtain from the SEEWQCI Consortium, represented for this processing by GRNET SA, a confirmation on whether or not their personal data are processed and, if so, to exercise the right to access such personal data pursuant to applicable legislation. The data subject may also request a copy of the personal data undergoing processing, as described in this Privacy Statement. The right to obtain a copy must not adversely affect the rights and freedoms of others.

Right of Rectification: The data subject shall have the right to request from the SEEWQCI Consortium, represented for this processing by GRNET SA, to rectify inaccurate personal data concerning them. Considering the purposes of the processing, the data subject shall have the right to request that any incomplete personal data be completed, including by means of providing a supplementary statement, in accordance with applicable legislation.

Right of Erasure: The data subject has the right to obtain the erasure of all personal data concerning them that have been collected and processed in accordance with this Privacy Statement and the applicable legislation.

Right to restriction of processing: The data has the right to obtain from the SEEWQCI Consortium, represented by GRNET SA, restriction of processing their data, if any of the conditions laid down by applicable legislation on the protection of personal data, is met.

Right to data portability: The data subject has the right to obtain any personal data concerning him/her, which he/she has provided in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another entity without any objection from the processor to which the personal data have been provided, in accordance with the provisions of the applicable legislation on personal data.

To exercise any of the above rights, the “subscriber” may contact the SEEWQCI at the following email address:

contact@seewqci.eu.

The aforementioned rights of the data subjects are subject to restrictions in accordance with the applicable legislation.

G. Personal data retention periods

The personal data collected and processed in the context of subscribing to the SEEWQCI Newsletter, based on the explicit consent of the data subjects, will be retained until the data subject withdraws their consent or formally exercises their right to erasure.

Data subjects have the right to withdraw their consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal. The withdrawal of consent can be easily executed through either of the following methods:

- a) By clicking the dedicated "unsubscribe" link provided at the footer of every newsletter communication.
- b) By completing the [Consent Withdrawal Form](#) and submitting it via email, or by sending a direct opt-out request, to contact@seewqci.eu

The unsubscribe button will also be provided without exception to any relevant SEEWQCI electronic communication.

It is mentioned that in this case, the legitimacy of the processing of personal data that took place in the context of the given previous consent is not affected.

H. Security measures:

The processing of personal data is carried out in such a way as to ensure its confidentiality and security. Specifically, it is carried out exclusively by authorised associates, while all appropriate organisational and technical measures are taken for data security and protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair treatment.

The data processor maintains its servers in a data center within the European Union and apply all appropriate organisational and technical measures for the security of the data and their protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair processing. For more information visit the website: <https://moosend.com/privacy-policy/>.

J. Contact:

For any questions or clarifications regarding the present Privacy Statement and as well as in the event of any violation related to personal data issues, “subscribers” may contact the DPO of GRNET SA at the e-mail address:

dpo@grnet.gr

K. Recourse/Complaint

In case a request is not satisfied by “the Consortium” the “subscriber” may at any time address to file recourse with the National Infrastructures for Research and Technology, (GRNET), which acts as lead supervisory authority for the SEEWQCI Consortium :

GRNET (Greek Research and Technology Network)

7 Kifisias Av.

Ampelokipi

Athens, 11523

GREECE

<https://grnet.gr/en/>

The SEEWQCI project is co-funded by Connecting Europe Facility (CEF) Programme, the EuroQCI EU funding initiative, under Grant Agreement No 101249531.