

PRIVACY POLICY

GECKO. (hereinafter “GECKO”) provides the following information in accordance with articles 13 and 14 of the Regulation (EU) 2016/679 (or General Data Protection Regulation, hereinafter “G.D.P.R.”) and subsequent national implementing law (hereinafter, together with the G.D.P.R., the “Applicable Privacy Legislation”), making it available to the users of the GECKO site (hereinafter the “Site”: <http://h2020-gecko.eu/>). Data subject’s information - which constitutes personal data pursuant to the Applicable Privacy Legislation - may be collected when she visits the site.

This disclosure applies solely to the Site and does not concern any other site that may be reached by the data subject through the links on the Site.

TYPES OF DATA PROCESSED

If data subject uses the Site, GECKO processes the following data.

Data subject is responsible for any third-party personal data communicated to GECKO. The latter assumes that data subject has the right to communicate or share third-party personal data, and it is thus freed from any responsibility towards the third-parties.

Personal data acquired automatically when you visit the Site

- **Web surfing information.** GECKO automatically collects data on your device (pc, tablet, mobile phone or other mobile device) and the connection you use, including, for example, your IP address, access date and time, hardware and software information, device event information, unique identifiers, crash data, and pages you viewed before or after using the Site.
- **Site usage data.** GECKO collects information about how you have used the Site, including, for example, the pages of the Site or other content displayed, searches, links to third-party applications on which you have clicked.

Personal data provided directly by the data subject

a) Optional data

- **Data provided to contact GECKO.** If data subject explicitly and voluntarily submits her data by contacting GECKO through the special section “Contact”, GECKO will collect the name and e-mail address provided for by the data subject, as well as any other personal data that the data subject inserts in the message.
- **Data provided for the activation of the newsletter service.** If data subject decides to activate the newsletter service offered by GECKO, the latter acquires the data subject’s email address.

Personal data contained in GECKO’s documents

GECKO collects personal data contained within the documents published on the Site.

Personal data collected through cookies

GECKO uses cookies to collect data about the data subject’s activity on the Site and her preferences, as well as other technical data.

For further information on the use of cookies, please refer to the cookie policy of the Site.

PURPOSE OF THE PROCESSING

Ensuring that the Site is operating; of the Site; providing data subject with the services that GECKO provides through the Site; protecting the vital interests of data subject; complying with the legal obligation to which GECKO is subject, or performing a task carried out in the public interest

GECKO processes the collected data in order to:

- keep the Site working and providing data subject with the required service, as well as to improve services and the Site and to keep secure the latter;
- prevent, detect and mitigate fraud, security breaches and potentially prohibited or illegal activities.

Pursuing the legitimate interests of GECKO while ensuring that these interests do not prevail over the fundamental rights and freedoms of data subject

In fact, GECKO processes the collected data in order to:

- identify and solve problems in the usage of the Site (for example, blocked or non-operative pages);
- know the data subject's opinions through surveys or questionnaires.

These treatments protect GECKO's interest in keeping the Site operative and efficient. They also do not harm the fundamental rights and freedoms of data subject, as they are foreseeable and widespread treatments in every website. Furthermore, these treatments also benefit data subject, allowing the site to keep on working.

Perform marketing operations and use statistical and marketing cookies after obtaining consent beforehand

As long as data subject gives her consent, GECKO processes the collected data in order to:

- e-mail marketing information, advertisement, information about special promotions and discounts and updates on the services offered by GECKO to data subject;
- customize the web-advertisement shown to the user, according to his/her choices on the Site;
- collect statistical information on the number of users who visit the Site (as unique visitors) and on their behaviour on the Site.

PROCESSING PROCEDURES

The personal data are processed by automated means exclusively for the purposes for which they were collected (see above) and stored for a specified period – which is determined according to the criteria indicated in this privacy policy (see below).

Personal data may be known and processed by GECKO's staff, duly instructed about the precautions to be taken pursuant to the Applicable Privacy Legislation.

DURATION OF THE PROCESSING

The specific time during which the personal data of the data subject is processed is documented in GECKO's register of processing activities – which has been implemented pursuant to article 30 of the G.D.P.R..

The data collected by GECKO (see above) is stored for a period that is necessary to GECKO in order to provide the data subject with the services of the Site and to keep the Site working – pursuant to recital 39 and art. 5, paragraph 1, letter e) of the G.D.P.R.

The collected data may be processed (according to recital 65 of the G.D.P.R.) for longer periods only if the longer retention period is required in order for GECKO to comply with specific legal obligations, to ascertain, exercise or defend a legal claim and/or to pursue other tasks of public interest - for example, in the case of orders of public authorities relating to the storage of data following an investigation, or for the storage of personal data for purposes related to a dispute, or for mandatory storage obligations relating to tax and accounting purposes).

Data subject who has consented to the processing of her data for marketing purposes is entitled to withdraw that consent at any time (see hereinafter).

As storage period has expired, the data subject's data are either deleted or permanently anonymised.

DATA DISCLOSURE

GECKO will communicate the personal data only and exclusively to the parties and for the purposes indicated below.

Fight against security breaches

- GECKO may disclose your personal data to third parties so that the latter can prevent fraud and security breach, as well as other unlawful activities. Such disclosure is limited to what is necessary to satisfy the related processing purposes;

Law enforcement, judicial proceedings and procedures authorised by law

- GECKO may disclose your personal data to courts, public authorities, government authorities or authorized third parties, in the event and to the extent that GECKO is required or authorized to do so by law, or if such disclosure is reasonably necessary. Such communications will have the purpose of:
 1. discharging GECKO's legal obligations;
 2. responding to claims made against GECKO;
 3. complying with verified requests relating to a criminal investigation or suspected illegal activity or any other activity that may expose GECKO or data subject to legal consequences;
 4. protecting the rights, property or personal safety of GECKO, of its employees, of the data subject or of the public at large.

DATA SUBJECT RIGHTS

Pursuant to the Applicable Privacy Legislation, at any time, free of charge and without any special charges or formalities data subject has the right to:

- obtain confirmation of GECKO processing their data;
- access to the data collected by GECKO, and be informed on the origin of these data, as well as on the purposes and objectives of the processing, on the storage period (or on the criteria used to determine it) of the data, and on information about third parties to whom the data are communicated;
- revoke her consent at any time, in the case of processing pursued on the basis of such consent. It is nevertheless specifically noted that any revocation of consent does not affect the lawfulness of the processing carried out prior to such revocation;
- update or correct the data collected by GECKO, to have them always correct and accurate;

- be forgotten, i.e. ensure that her data collected by GECKO are deleted from GECKO's databases and/or backup archives. Data will be deleted if:
 - 1) it is no longer necessary for the purposes of the processing, or if the data subject has withdrawn her consent to the processing, or if the data subject has opposed the processing of the data (as in the cases specified hereinafter), or if the data have been processed unlawfully or the Applicable Privacy Legislation provides for such erasure; moreover
 - 2) if the processing of personal data is not necessary for GECKO for one of the reasons referred to in Article 17, paragraph 3 of the G.D.P.R. (including, in particular, the fulfilment of a legal obligation requiring such processing; the pursuit of requirements that are in the interest of the public; the establishment, exercise or defence of legal claims);
- limit the processing of personal data by GECKO, in the cases referred to in Article 18, paragraph 1 of the G.D.P.R. (e.g. where the accuracy of the data has been contested);
- to oppose at any time to the processing of her personal data when the processing is carried out to pursue public interests or GECKO's legitimate interests. Nonetheless, GECKO could overcome this objection if succeeding in demonstrating that the processing is necessary to pursue includible legitimate interests or to assert its right in judicial proceedings;
- request for having data processed - on the basis of her consent or to fulfil contractual obligations towards her - provided in a structured, commonly used format which can be read by an automatic device. Data subject can also transmit these data to third parties, without GECKO being entitled to take any action to prevent it;
- be informed, within a reasonable time, of any rectification, erasure or restriction of the processing ordered by GECKO, as well as of any revocation of such measures and the reasons for such revocation (for example, for the limitations on the processing, the expiration of the limitation period, or if the circumstances that caused the limitation of the processing no longer apply: for example, verification of the accuracy of data subject's personal data).

Data subject can exercise these rights by sending an informal written request to GECKO, via e-mail to the GECKO Project Coordinator, yannick.bousse@uitp.org

Once GECKO has received the e-mail, through the data controller it will satisfy the data subject's request without delay, and, in any case, at the latest within one month from the receipt of the request. This period can be extended by two months when necessary, namely on the base on the complexity and the number of applications. Should an extension occur, within one month by the request's receiving, GECKO will inform the data subject about both the extension of the deadline and the related reasons.

GECKO hereby reminds the data subject that in the event of her dissatisfaction with the response received, the data subject is entitled to address and lodge a complaint with the Data Protection Authority (<http://www.garanteprivacy.it/>) in the manner provided by the Applicable Privacy Legislation.

Last updated: May 2019