



## BECoop Privacy Policy

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[www.becoop-project.eu](http://www.becoop-project.eu)



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## Document dissemination Level

Dissemination Level	
X	PU - Public
	PP - Restricted to other programme participants (including the EC)
	RE - Restricted to a group specified by the consortium (including the EC)
	CO - Confidential, only for members of the consortium (including the EC)

## Document history

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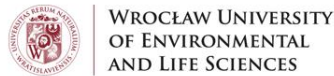
## About

Over the last years, the EU has witnessed some remarkable steps in Renewable Energy (RE) deployment. However, at the same time, we see an increasingly uneven penetration of RE across the different energy sectors, with the heating and cooling sector lagging behind. Community bioenergy schemes can play a catalytic role in the market uptake of bioenergy heating technologies and can strongly support the increase of renewables penetration in the heating and cooling sector, contributing to the EU target for increasing renewable heat within this next decade. However, compared to other RES, bioenergy has a remarkably slower development pace in the decentralised energy production which is a model that is set to play a crucial role in the future of the energy transition in the EU.

The ambition of the EU-funded BECoop project is **to provide the necessary conditions and technical as well as business support tools for unlocking the underlying market potential of community bioenergy**. The project's goal is to make community bioenergy projects more appealing to potential interested actors and to foster new links and partnerships among the international bioenergy community.

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## Project partners



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# 1 BECoop project Privacy Policy

## 1.1 How we collect your personal data

We collect personal data both directly and indirectly:

**Directly.** We obtain personal data directly from individuals in a variety of ways, including but not limited to the following cases:

- an individual registers to attend in meetings and events we host and during attendance at such events;
- an individual participates in an interview or survey organised by us;
- an individual subscribes to our project newsletter;
- we establish cooperative relationships with an individual;
- we provide professional services pursuant to our contract with the European Commission.

**Indirectly.** We obtain personal data indirectly about individuals from a variety of sources, including:

- our research partners;
- our networks and contacts;
- public and open data sources such as public registers, news articles and internet searches;
- social and professional networking sites (e.g., LinkedIn).

## 1.2 What types of data we collect?

We only collect the data that are necessary for the smooth implementation of our project. These data fall into the following categories:

- **contact details** (name/surname, e-mail address, phone number);
- **professional information** (job title, organisation, field of expertise);
- **demographics** (e.g. age, gender, nationality);
- information about what a person knows or believes;
- **videos and photos** (from people that attend our events).

## 1.3 Technical means of data collection

Your personal data may be collected on publicly available websites, through partners' databases, via surveying software (e.g., Google Forms, EU Survey, SurveyMonkey) and via direct enquiry to you during project activities. Should we collect your personal data in any other way than through direct enquiry with you, we will make sure to inform you about this and about the source of the data.

## 1.4 Bases of lawful processing

We process personal data on the following legal bases:

- **Legal obligations** - for processing activities required for compliance both with applicable national and European legislation as well as with the specific legal and regulatory framework of the Horizon 2020 Framework Programme for Research and Innovation of the European Union.
- **Consent** – for processing activities such as organization of surveys and interviews, completing of questionnaires and dissemination of project’s results.
- **Contractual obligations** - for processing activities such as reporting to the European Commission and complying with project’s publicity obligations.

## 1.5 What we do with your personal data

We process your personal data with the purpose of:

- Conducting research (e.g., interviews, workshops, surveys);
- Dissemination our project’s results to different types of stakeholders;
- Sending invitations and providing access to guests attending our events and webinars;
- Administering, maintaining, and ensuring the security of our information systems, applications, and websites;
- Processing online requests or queries, including responding to communications from individuals;
- Complying with contractual, legal, and regulatory obligations.

## 1.6 How we secure your personal data when we process it

We continuously apply a personal data risk assessment process to identify, analyse, and evaluate the security risks that may threaten your personal data. Based on the results of this risk assessment, we define and apply a set of both technical and organizational measures to mitigate the above security risks, including but not limited to:

- Data Protection Policies to guide our personnel when processing your data;
- Written contracts with organizations that process personal data on our behalf;
- Non-Disclosure Agreements with our personnel;
- Back up process, antimalware protection, access control mechanisms, etc.

## 1.7 Do we share personal data with third parties?

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. When we do so, we ensure that recipients are contractually bound to safeguard the data we entrust to them before we share the data. We may engage with several or all the following categories of recipients:

- Parties that support us as we provide our services (e.g., cloud-based software services such as Google Drive, Dropbox, Microsoft Sharepoint);
- Our professional advisers, including lawyers, auditors, and insurers;
- Dissemination services providers (e.g., MailChimp);
- Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with applicable law or regulation;
- The European Commission according to our relevant contractual obligations.

## 1.8 Do we transfer your personal data outside the European Economic Area?

We do not own file servers located outside the European Economic Area (EEA). However, some partners may use cloud and / or marketing services from reputable providers such as Google Drive, SharePoint, DropBox, MailChimp, etc., situated both inside and outside the EEA. We always check that such providers comply with the relevant GDPR requirements before start using their services.

## 1.9 BECoop website Privacy & Cookies Policy

BECoop project website: [www.becoop-project.eu](http://www.becoop-project.eu)

This section describes, in accordance with the EU General Data Protection Regulation 2019/679, how and when we may collect, use and share information related to our project’s website visitors or BECoop’s newsletter recipients. The BECoop project website is being managed by IEECP (IEECP – Amsterdam Sloterdijk Teleport Tower, Kingsfordweg 151, 1043GR, Amsterdam, The Netherlands – [www.ieecp.org](http://www.ieecp.org)).

### Personal information collected via the BECoop website

Upon visiting the BECoop website, BECoop automatically collects, via cookies installed to make the website operational and gather analytics data, some information about the visitor’s device, including information about the web browser use to enter the website, IP address and time zone. Additionally, information is being captured on the individual web pages or documents a visitor views, and on how the visitor interacts with the website. BECoop refers to this automatically collected information as “*Device Information*”.

We also collect, use and store the contact information filled when a visitor subscribes to the project’s newsletter: by ticking the box under the form, visitors may freely consent to the processing of this information, used only for the project team to be able to send the newsletter.

### The BECoop website collects Device Information using the following technologies:

- “**Cookies**” are data files that are placed on the visitors’ device or computer and often include an anonymous unique identifier. Visitors can delete all cookies already on their devices by clearing the browsing history of their browser. This will remove all cookies from all websites they have visited. Visitors though should be aware that they may also lose saved information (e.g. saved login details, site preferences).

Most browsers allow you to block or delete cookies. For more information on how to set the preferences for cookies, please refer to the instructions provided by your browser. You can find out more about cookies and how to control them on [www.allaboutcookies.org](http://www.allaboutcookies.org).

*Please note that If you block our use of cookies, you may be unable to access certain pages of our website and certain services or functions may become unavailable or malfunction.*

The following cookies are used by the BECoop website:

Cookie	Name	Purpose	Duration
Google analytics	_ga	Used to distinguish users.	2 years after installation/update
Google analytics	_gid	Used to distinguish users.	24 hours after installation/update
Google analytics	_gat or _dc_gtm_<property-id>	Used to throttle request rate.	1 minute after installation/update
Multilanguage support	_icl_current_language	Enables multilanguage features of the site.	24 hours



- “**Log files**” track actions occurring on the Site, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.
- “**Web beacons,**” “**tags,**” and “**pixels**” are electronic files used to record information about how visitors browse the Site.

Additionally, when visitors contact BECoop through the website, we collect certain information, including their name, and email address. We refer to this information as “*Contact Information*”.

When we talk about “*Personal Information*” in this Privacy Policy, we are talking both about ***Device Information*** and ***Contact Information***.

#### How do we collect website visitors’ data?

We collect and process data when visitors:

- Register online for receiving information on new material (newsletter).
- Voluntarily complete a survey or provide feedback via email or via links shared on the website.
- Use or view our website via their browser’s cookies.
- Register online to our events or webinars.

#### How do we use website visitors’ personal information?

We use *the Contact Information* to communicate with visitors and, when in line with the preferences each visitor has shared with us, provide them with information or advertising related to the project and its developments.

We use the *Device Information* to screen for potential risk and fraud (in particular IP addresses), and more generally to improve and optimize our Site (for example, by generating analytics about how our audience browses and interacts with the Site, and to assess the success of our communication and dissemination campaigns).

#### Sharing visitors’ personal information

We share website visitors’ *Personal Information* with third parties to help us use their *Personal Information*, as described above. This includes website hosting and mailing list providers. We also use a statistics tracker (Google Analytics) to help us understand how our audience uses the BECoop website.

Detailed information on how Google uses visitors’ *Personal Information* is available here: <https://www.google.com/intl/en/policies/privacy>. One can also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>

Finally, we may also share visitors’ *Personal Information* to comply with applicable laws and regulations, to respond to a subpoena, search warrant or other lawful requests for information we receive, or to otherwise protect our rights. We may also share visitors’ *Personal Information* with EASME (European Agency for SMEs) in order to fulfil our contractual obligation under the Horizon 2020 programme in terms of project delivering, but not in the form of a public deliverable.

### Behavioural advertising

As described above, we may use the website visitors' *Personal Information* to provide them with project-related content that we believe may be of interest to them.

### How do we store website visitors' data?

We securely store visitors' data in our internal databases (Google Drive) and on the project website back office. We will keep visitors' *Personal Information* for the entire period of the project and for 5 additional years as required by law for controls on Horizon 2020 projects. Data will, therefore, be available to the relevant European Commission Agency, the Executive Agency for Small and Medium-sized Enterprises (EASME). Once this period has expired, we will delete visitors' data from the databases.

### Do not track

Please note that we do not alter our website data collection and use practices when we see a Do Not Track signal from a visitor's browser.

European residents visiting the website have the right to access personal information we hold about them and to ask that their personal information be corrected, updated, or deleted. If visitors would like to exercise this right, they can directly contact us by email: [contact@becoop-project.eu](mailto:contact@becoop-project.eu)

### Data retention

When visitors contact us through the Site, we will maintain their *Contact Information* for our records unless and until they ask us to delete this information.

If a newsletter subscriber wishes not to receive it anymore, he/she can click directly in the newsletter button to do so, or can unsubscribe by sending an email to the BECoop [communications manager](#).

### Changes

We may update this privacy policy from time to time to reflect, for example, changes to our practices or for other operational, legal or regulatory reasons. The latest update to the document was made on **March 01, 2021**.

### Links to other websites

The BECoop website includes links to third-party websites as we share interesting resources and sister projects. We are not responsible for the privacy & cookies policies of third parties, nor are we responsible for the information or content these websites contain. Please refer to the privacy & cookies policies of these websites directly.

## 1.10 Your rights

You have the following rights regarding our processing of your personal data:

- **Right to withdraw consent** – You can withdraw consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
- **Right of access** – You can ask us to verify whether we are processing personal data about you and, if so, to have access to a copy of such data.
- **Right to rectification and erasure** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you or ask us to erase your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
- **Right to restriction of processing** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
- **Right to data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another entity.
- **Right to object** – You can object to our use of your personal data for direct marketing purposes, including profiling or where processing has taken the form of automated decision-making. However, we may need to keep some minimal information (e.g., e-mail address) to comply with your request to cease marketing to you.
- **Right to make a complaint to your local Data Protection Authority (DPA)** regarding any concerns you may have about our data handling practices.

(see [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm))

To ask us to do anything of the above, you can contact us by email: [contact@becoop-project.eu](mailto:contact@becoop-project.eu)

We will promptly examine your request against the relevant requirements of the laws and regulations governing privacy and personal data protection and we will answer the latest within 30 days after receiving your request. We will ask from you some kind of identification (e.g., photocopy of your identity card or passport) to avoid non-authorized reveal of your personal data. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within 30 days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline.

## 1.11 How long do we retain personal data?

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations, and contractual obligations to which we are subject. Please note that we have an obligation to retain data concerning projects funded by the Horizon 2020 Framework Programme for Research and Innovation of the European Union for up to five years after the end of the project (unless further retention is requested by auditors). After the expiry of the retention period, and unless further legitimate grounds for retention arise, we will dispose of personal data in a secure manner.

## 1.12 Disclaimer of liability for third party websites

Although our site may contain links to third-party sites, including the sites of the consortium partners, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site's responsible personnel. We suggest you read the privacy policy of each website you interact with, before allowing the collection and use of your personal data.

We may also provide social media features that allow you to share information on your social networks and interact with our project on various social media sites. The use of these social media features may result in the collection or sharing of information about you. We recommend that you check the privacy policies and regulations of the social networking sites you interact with, so that you can be sure that you understand what information may be collected, used, and disclosed by these sites.

## 1.13 Revisions of this Privacy Policy

This Privacy Policy is valid from **01/03/2021** and replaces any other previous notifications that we had issued in the past regarding our personal data management practices. We reserve the right to revise this Policy at any time. The current version will be always uploaded to our website indicating the date of entry into force, so you know when the most recent revision took place. If there are critical changes in this policy or our personal data practices change significantly in the future, we will notify you by posting the changes on our website.