



# **Research initiative for Enhancing and Adapting Workforce SKILLs for Implementing TraNsport Automation with Employment Growth**

## **ReSKILLING**

Grant Agreement Number: 101147328

### **Privacy Policy for project website**



**Funded by  
the European Union**

This work has received funding from the Swiss State Secretariat for Education, Research and Innovation (SERI) for the Swiss partners

The Centre for Research and Technology Hellas - Hellenic Institute of Transport (CERTH/HIT), as Project Coordinator and co-responsible for the content of the ReSKILLING website, the European Conference of Transport Research Institutes (ECTRI), as WP Dissemination leader and co-responsible for the content of the ReSKILLING website and Newsletter updates, and POLIS Network AISBL (POLIS), as WP Stakeholder Engagement leader and co-responsible for the content of certain **events registration forms**, respect your online privacy and handles your personal data with care. We are responsible for the use of the personal information that we collect to carry out our activities and take all measures within our power to ensure the safety of that use of personal data.

This Privacy Policy applies to our Website <https://reskilling-project.eu> (the "Website") and the services that we offer (the "Services"). The personal data are processed in accordance with the Regulation (EU) 2016/679, the General Data Protection Regulation (GDPR), on the basis of your consent, our legitimate interest, or legal obligations, as further described in Article 3.

When you register for certain Services, we will ask you to provide personal information. When you sign up to stay informed about our activities, you agree that ECTRI collects and registers the personal information that you transfer. If you are an employee or volunteer of one of our member organisations, based on our terms of reference we have a legitimate interest to retain your data to carry out our activities, unless otherwise indicated by you (see Article 5: Your rights).

This "Privacy Policy" regulates the processing of your personal data by the controllers:

- CERTH/HIT, with registered premises at 6th Km Harilaou Thermi, 57001 Thessaloniki, Greece, Non-Profit Organisation under Private Law with statutory registration number: PD77/2000.
- ECTRI, with registered premises at Square de Meeûs 38/40, 1000 Bruxelles, Belgium, and recorded in the Crossroads Bank for Enterprises under the number <831 370 370>.
- POLIS Network AISBL, with registered premises at Rue du Trône 98, 1050 Brussels, Belgium, VAT Number BE.0460.400.701

For specific activities such as event organisation, registration collection, and stakeholder engagement, CERTH/HIT, ECTRI and POLIS act as **joint controllers** and jointly determine the purposes and means of processing personal data in accordance with Article 26 GDPR.

Please read through this Privacy Policy carefully, since it contains your rights vis-à-vis CERTH/HIT, ECTRI, and POLIS. The Privacy Policy may be reworked or updated from time to time.

## Article 1 - Personal data that you communicate to us

### 1.1. During a visit to this Website:

- IP address
- Authentication and tracking cookies – see our Cookies Policy.

### 1.2. When registering for our newsletters:

- Name and Surname
- e-mail address
- Tracking data (subscriptions, bounces, opens, clicks, geographic location)

This data is processed through Mailchimp, our external Newsletter communication provider.

### 1.3. When registering to the events:

- e-mail address
- First name
- Last Name
- Organisation
- Position/Job title

These data may be collected directly by POLIS on behalf of the ReSKILLING project.

## Article 2 - Personal data that we collect indirectly

### 2.1. Public data of the principal, customer, or some other business relation.

CERTH/HIT and ECTRI sometimes process public data, e.g. data that are subject to a publication duty, such as the publication of your appointment as director of an organisation, or data that you made public yourself, such as information posted on your website, or data that are generally known in your region or that have appeared in the press.

## Article 3 - Purposes of the processing

### 3.1. General purposes

CERTH/HIT and ECTRI will use the gathered personal data exclusively for the following purposes:

- **IP address** (see article 1.1): to look after and improve this Website by including Personal Data in anonymous statistics, from which the identity of specific persons or companies cannot be discovered, with as legal basis the legitimate interests of

CERTH/HIT and ECTRI in continuously improving its Website and provision of services.

- **Name, e-mail address** (see article 1.2) when subscribing to this Website's contact Newsletter. Data processing when subscribing to the Newsletter is based on your explicit consent. Your subscription is handled via Mailchimp, which securely collects and processes your name and email address for the purpose of sending project updates. The subscription form is accessed through a secure [iframe](#) from our Website – linked to Mailchimp's signup form. The processing of your personal data is carried out in accordance with our Privacy Policy and GDPR
- **Name, e-mail address, organisation, job title** (see article 1.3): in order to be able to provide the requested services, with as legal basis the legitimate interest to carry out our activities as described in our terms of reference.
- **Photos and videos** to be used for our internal and external communications, with as legal basis your prior explicit consent.

You are not obliged to release your personal data, but you do understand that the granting of certain services becomes impossible if you refuse the processing. Event registration data (name, email, organisation, position) may also be collected and processed by POLIS Network as part of their role in organising or co-organising project events. In such cases, POLIS acts as a joint controller together with CERTH/HIT and ECTRI, and processes your data exclusively for the purpose of managing event participation, communication with participants, and reporting obligations of the ReSKILLING project

### • 3.2. Newsletters and Emails

The personal data will also be used for direct marketing (sending content promoting directly or indirectly our activities).

If you subscribe to the ReSKILLING Newsletter ('ReSKILLING Brief'), your data will be processed by Mailchimp for the purpose of distributing our updates. Mailchimp acts as a processor on our behalf and processes your data exclusively according to our instructions.

Mailchimp is located outside the European Economic Area (EEA). Personal data transfers to Mailchimp are safeguarded through Standard Contractual Clauses (SCCs) and additional measures provided by Mailchimp to ensure GDPR-compliant processing

This consent can be withdrawn at any time – free of charge and without any obligation for a justification via a weblink embedded at the bottom of each Newsletter edition or via [this hyperlink](#).

### • 3.3. Transfer to third parties

CERTH/HIT, ECTRI, and POLIS will never pass on your personal data to third parties, with the exception of ReSKILLING partners supporting us and technical service providers who handle technical support in so far as this is necessary for the technical provision of

services and/or if they are obliged to do so on the basis of a statutory provision or a judicial ruling. The data transfer is based on our legitimate interest of efficiently organising and allocating our tasks and duties.

Furthermore, we use the following instruction-bound processors:

- [Google Analytics](#)
- [Mailchimp](#)

CERTH/HIT, ECTRI, and POLIS will not sell your personal data, rent them out, share them or otherwise make them commercially available to third parties. Mailchimp is used exclusively for managing newsletter subscriptions and sending communications. Mailchimp does not use your data for its own purposes.

### • 3.4. Legal requirements

In rare cases, it is possible that CERTH/HIT, ECTRI, and POLIS are obliged to reveal your personal data subject to a court order or in order to comply with other compelling laws or regulations. CERTH/HIT, ECTRI, and POLIS shall make reasonable attempts to inform you in advance about this, unless it is subject to legal restrictions.

## Article 4 - Duration of the processing

The personal data are kept and processed by us for a period that is necessary as a function of the purposes of the processing as described in article 3, and as a function of the contractual relationship between CERTH/HIT, ECTRI, POLIS, and you:

- **IP address and tracking cookies:** up to 6 months after the project end (December 31, 2027).
- **E-mail address, name:** for the duration of the requested delivery of services.
- **Name, e-mail address, organisation, job title:** for the duration of the requested delivery of services.

The aforementioned personal data are in any case kept in accordance with prescription periods that oblige us to maintain your personal data for a longer period, e.g. in order to defend ourselves against an action at law.

## Article 5 - Your rights

### • 5.1. Your Rights

CERTH/HIT, ECTRI, and POLIS are committed to ensuring fair and transparent data processing. You can always contact ECTRI in case of questions about the data subject rights and are free to exercise your data subject rights where the respective legal requirements are satisfied:

- Right to information, Art 15 GDPR

- Right to rectification, Art 16 GDPR
- Right to deletion (right to be forgotten), Art 17 GDPR
- Right to restrict processing, Art 18 GDPR
- Right to data portability, Art 20 GDPR
- Right to withdraw your consent, Art 7 Para 3 GDPR

**Furthermore, you have the right to object to processing of your personal data on basis of our legitimate interests on grounds relating to your particular situation, Art 21 GDPR.**

## • **5.2. Exercising your rights**

You can exercise your rights by contacting us either via email: [the.reskilling.project@gmail.com](mailto:the.reskilling.project@gmail.com), or by post to: either CERTH/HIT, 6th Km Harilaou Thermi, 57001 Thessaloniki, Greece; ECTRI, Square de Meeûs 38/40, 1000 Brussels, Belgium, or POLIS, Rue du Trône 98, 1050 Brussels, Belgium. Please provide information allowing us to identify you. This can be your name, organisation, e-mail address and postal address. If you send us a copy of your official form of identification, please black out all other information apart from your first and last name and address.

If your personal data is processed through Mailchimp, you may also exercise your rights (such as access or erasure) directly through the [unsubscribe link](#) embedded in each email or by contacting us using the details above.

## • **5.3. Automatic decisions and profiling**

The processing of your Personal Data does not include any profiling, nor will you be subject by us to automated decisions.

## • **5.4. Right to file a complaint**

You have the right to file a complaint with:

- the Hellenic Data Protection Authority (HDPa), Kifisias 1-3, 115 23 Athens, Greece, Tel: +30 210 6475600, Email: [contact@dpa.gr](mailto:contact@dpa.gr)
- the Belgian Data Protection Authority, Rue de la Presse 35, 1000 Brussels, Tel: +32 (0)2 274 48 00, Email: [contact@apd-gba.be](mailto:contact@apd-gba.be)