

# Deliverable 2.5

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## Privacy Policy

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### Abstract

D 2.5 “Privacy Policy” is a document that explains how CleverGuard handles any visitor or client information gathered in its operations.

### What is new in this Version

This is the first version of the Privacy Policy.

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Version	Date	Changes	Organization
0.1	Apr 21	Initial Creation	HSLU
0.2	Aug 10	First Draft	ICA

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## WHO ARE YOU?

We are CLEVERGUARD, and international consortium of a research and development project funded by AAL and the member organisations. The members are:

CLEMAP AG (Consortium lead, primary contact)	Lavaterstrasse 66, Zurich, 8002, Switzerland
Inspiring Culture Kft.	Beregszász út 80., 1112, Hungary
Bay Zoltán Nonprofit Ltd. for Applied Research	Kondorfa utca 1., Budapest, 1116, Hungary
Vicino Luzern	Brünigstrasse 20, Luzern, 6005, Switzerland
iHomeLab Hochschule Luzern Technik & Architektur	Technikumstrasse 21, Horw, Lucerne 6048, Switzerland
Fondazione Santa Lucia IRCCS	Via Ardeatina, 306, Rome, Latium 00179, Italy
Telecom-IT group	Durmelaan 7a, Aalter, Flemish Region 9880, Belgium
Senior Living Group	Satenrozen 1b, Kontich, Flemish Region 2550, Belgium

The information we collect, store and handle about you is for the purpose of our project and is accessible by the authorized personnel of the project members listed above. The information is not shared with any 3<sup>rd</sup> parties, beside our information system providers.

## WHY IS THIS DOCUMENT?

CLEVERGUARD respects the privacy of our users. This Privacy Policy explains how we collect, use, disclose, and safeguard your information when you visit our website.

## WHY DO USER NEED TO ACCEPT THE PRIVACY POLICY?

By accessing to or using our Website, and in particular by providing your personal information to us, or contacting us for any reason, you are required to explicitly accept this Privacy Policy and provide us with full consent, when needed, to the collection, storage and processing of personal data for which you are responsible in accordance with the terms set out in this policy, including the sending of electronic communications, as the case may be.

## WHAT IS THE SCOPE OF THIS PRIVACY POLICY?

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to individuals who enter our website or provide us with information in any other way.

## WHAT IS THE LEGAL BASE?

Our legitimate interest to manage the services and carry out the actions that you are requesting us. We consider any possible impact (both positive and negative) on you and on your rights before processing your data for our legitimate interest.

In specific circumstances, to comply with a legal obligation we are subject to.

## WHAT TYPE OF INFORMATION DO YOU COLLECT?

### Personal data

Personal data are any information which are related to an identified or identifiable natural person, such as your name, email address, login, password, comments, feedback, product reviews, recommendations, and personal profile. You are under no obligation to provide us with personal information of any kind, however your refusal to do so may prevent you from using certain features of the Site.

### Derivative Data

Information our servers automatically collect when you access the Site, such as your IP address, your browser type, your operating system, your access times, computer and connection information, purchase history and the pages you have viewed directly before and after accessing the Site.

## WHY DO YOU COLLECT SUCH PERSONAL INFORMATION?

To provide and operate the Services;

To provide our Users with ongoing customer assistance and technical support;

To be able to contact our Visitors and Users with general or personalized service-related notices and promotional messages;

To create aggregated statistical data and other aggregated and/or inferred Non-personal Information, which we or our business partners may use to provide and improve our respective services;

To comply with any applicable laws and regulations. To process payments and refunds.

## HOW DO YOU STORE YOUR SITE VISITORS' PERSONAL INFORMATION?

Our webpage is hosted on the Wix.com platform. Wix.com provides us with the online platform that allows us to sell our products and services to you. Your data may be stored through Wix.com's data storage, databases and the general Wix.com applications. They store your data on secure servers behind a firewall.

All direct payment gateways offered by Wix.com and used by our company adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, MasterCard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of credit card information by our store and its service providers.

## FOR HOW LONG DO YOU RETAIN PERSONAL DATA?

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements, or until the deactivation of your account either by you or by us. After that period, the data will be retained (in a blocked and secure manner) for the required period of legal and administrative liability and to comply with legal obligations and other purposes set out above, which may be up to 10 years according to current applicable law.

## DO YOU SHARE VISITORS' PERSONAL INFORMATION WITH THIRD PARTIES?

We treat your personal data with strict confidentiality in accordance with applicable law. Unless otherwise indicated, your personal data will not be provided to third parties.

We may share your information with third parties that perform services for us or on our behalf, including payment processing, data analysis, email delivery, hosting services, customer service, and marketing assistance.

If we believe the release of information about you is necessary to respond to legal process, to investigate or remedy potential violations of our policies, or to protect the rights, property, and safety of others, we may share your information as permitted or required by any applicable law, rule, or regulation. This includes exchanging information with other entities for fraud protection and credit risk reduction.

## HOW DO YOU COMMUNICATE WITH YOUR SITE VISITORS?

We may contact you to notify you regarding your account, to troubleshoot problems with your account, to resolve a dispute, to collect fees or monies owed, to poll your opinions through surveys or questionnaires, to send updates about our company, or as otherwise necessary to contact you to enforce our User Agreement, applicable national laws, and any agreement we may have with you. For these purposes we may contact you via email, telephone, text messages, and postal mail.

## HOW CAN YOUR SITE VISITORS WITHDRAW THEIR CONSENT?

If you don't want us to process your data anymore, please contact us at [info@cleverguard.care](mailto:info@cleverguard.care) or send us mail to: CLEVERGUARD c/o CLEMAP AG, Lavaterstrasse 66, 8002 Zürich, Switzerland.

## WHAT ARE MY RIGHTS AND HOW TO EXERCISE THEM?

- **Right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data, and your rights.
- **Right of access.** This enables you to receive a copy of the Personal Data we process about you and to check that we are lawfully processing it.

- **Right to rectification.** Request correction of the Personal Data that we process about you.
- **Right to erasure (Right to be forgotten).** This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it.
- **Right of restriction of processing.** This enables you to ask us to suspend the processing of Personal Data about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Right to data portability.** Request the transfer of your Personal Data. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format.
- **Right to object.** You may object at any time to our processing of your personal data when such processing is based on our legitimate interests.
- **Right to withdraw data protection consent.** If you withdraw your consent, we may not be able to provide you with access to the certain specific functionalities of our Site. We will advise you if this is the case at the time you withdraw your consent.
- **Right to complain.** You have the right to contact the data protection authority of your country in order to lodge a complaint against our data protection and privacy practices.
- **The right to deactivate cookies.** If you wish to restrict or block all the cookies which are set by our websites, please use the tool available on the particular website (if applicable), or refer to the Help function within your browser to learn how to manage your settings within your browser.

If you wish to exercise these rights, you may at any time directly contact us.

## PRIVACY POLICY UPDATES

We reserve the right to amend the terms of this Privacy Policy and will notify you by providing a clear notice of these changes by email or on our website, and in this Privacy Policy.

## HOW CAN I CONTACT YOU?

If you would like to: access, correct, amend or delete any personal information we have about you, you are invited to contact us at [info@cleverguard.care](mailto:info@cleverguard.care) or send us mail to: CLEVERGUARD c/o CLEMAP AG, Lavaterstrasse 66, 8002 Zürich, Switzerland.