

DLM FORUM PROTECTION OF YOUR PERSONAL DATA

Processing operation: Management of subscriptions to receive information

Data Controller: DLM Forum MTÜ, Nooruse 3, Tartu, Estonia, 50411

Data Processor: Gabinete UMBUS SL, Calle del Cardenal Siliceo, 28016 Madrid, Spain

AIT Austrian Institute of Technology GmbH, Giefinggasse 4, 1210 Vienna, Austria

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1. Introduction The DLM Forum MTÜ is committed to protect your personal data and to respect your privacy. The DLM Forum MTÜ collects and further processes personal data pursuant to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the Data Protection Supervisor.

The information in relation to the processing operation “Management of subscriptions to receive information”, undertaken by the services of the DLM Forum MTÜ, is presented below.

2. Why and how do we process your personal data?

Purpose of the processing operation: the controller collects and further processes your personal data so that you can receive information that you have requested on important developments, activities, events, initiatives or thematic issues in the area of (a) service(s) of the DLM Forum MTÜ in particular through articles, reports, interviews, newsletters as well as visual content. Your personal data will not be used for an automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data?

You have subscribed to receive the information on important developments, activities, events, initiatives or thematic issues in the area of (a) service(s) of the DLM Forum MTÜ. We process your personal data, because you have given your consent to the processing of your personal data for the purpose of receiving the requested information.

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the controller collects the following categories of personal data:

- Your name, surname and email address are needed to ensure the delivery of the service to you as a subscriber.

The following personal data is needed for providing you with a more personalised experience (i.e. better targeting the content of the information) and for generating anonymised statistics:

- Title
- Function
- Country of residence
- Sector of activity / interest
- Profession

5. How long do we keep your personal data?

The controller only keeps your personal data for the time necessary to fulfil the purpose of collection, namely until you unsubscribe from the mailing list.

Depending on the technical solutions available, you can either write to the dedicated functional mailbox and ask to be unsubscribed from the mailing list or follow the unsubscribe link in the information email you have received.

Appropriate action shall be taken within a week of receiving the request. In the case where data is kept for statistical purposes, some subscriber's optional data may be kept for 5 years after the un-subscription, providing these do not allow to identify the subscriber any longer and that these are available to a very restricted number of authorised persons performing the processing operation on a need to know basis, for the sole purposes of generating anonymised statistics.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the DLM Forum MTÜ (or of its contractors, if a contractor is used to assist the controller in the management of a particular type of subscriptions to receive information). All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission. In order to protect your

personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation. If the controller uses (a) contractor(s) (processor(s)) to assist the controller in the management of a particular type of subscriptions, this will be indicated in the specific privacy statement and the following paragraph will be provided: The DLM Forum MTÜ's processors (contractors) are bound by a specific contractual clause for any processing operations of your personal data on behalf of the Commission. The processors have to put in place appropriate technical and organisational measures to ensure the level of security, required by the Commission.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the DLM Forum MTÜ staff responsible for carrying out this processing operation and to other authorised DLM Forum MTÜ staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements. If the controller uses (a) processor(s) (contractor(s)) to assist the controller in the management of subscriptions to receive information, the controller may also share your information with those processors for the purpose of managing subscriptions to receive information. In that case, a list of processors (contractors) will be included in the specific privacy statement. If the controller uses a processor (contractor) from a third country, the following two paragraphs will be provided in the specific privacy statement: The controller will transfer your personal data to its processors (contractors) in third countries in accordance with Regulation (EU) 2018/1725. The legal basis for the transfer of your personal data should be specified in the specific privacy statement and could be one of the following:

- adequacy decision of the Commission for a specific country / commercial sector (Article 47 of Regulation (EU) 2018/1725) or,

- appropriate safeguards (Article 48 of Regulation (EU) 2018/1725), if there is no adequacy decision for the respective third countries / commercial sectors. The specific privacy statement will provide (1) reference to the appropriate safeguards, and (2) the means by which a data subject can obtain a copy of them / or indicate where they have been made available; or,
- derogation(s) for specific situation(s), if there is no adequacy decision for the respective third countries / commercial sectors, and no appropriate safeguards for transfer. Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. International data transfers

Your personal data might be transferred in third countries due to the use of servers located outside the EU to optimise the quality of service.

In this case, contractual, organisational and procedural measures relating to the personnel or companies involved ensure an adequate level of protection, security and confidentiality of Personal Data:

- i. Potential transfers to the United Kingdom are based on an adequacy decision (Article 47 of Regulation (EU) 2018/1725): Commission Implementing Decision, of 28.6.2021, pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the adequate protection of personal data by the United Kingdom;
- ii. Potential transfers to the United States are based on an adequacy decision (Article 47 of Regulation (EU) 2018/1725): Commission Implementing Decision of 10.7.2023 pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the

adequate level of protection of personal data under the EU-US Data Privacy Framework.

9. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access your personal data and to rectify them in case your personal data are inaccurate or incomplete. Where applicable, you have the right to erase your personal data, to restrict the processing of your personal data, to object to the processing, and the right to data portability.

You have consented to provide your personal data to the controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The specific privacy statement will explain how consent can be withdrawn. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the Data Protection Supervisor. Their contact information is given below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified below) in your request.

10. Contact information

- **The Data Controller** If you would like to exercise your rights under Regulation (EU) 2018/1725, if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, (secretariat@dilmfoum.eu).

- **The Data Protection Officer (DPO) of the DLM Forum MTÜ.** You may contact the Data Protection Officer (dataprotection@dlmforum.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- **The Data Protection Supervisor (DPS)** You have the right to have recourse (i.e. you can lodge a complaint) to the Data Protection Supervisor (info@aki.ee) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.