NEXT GENERATION INTERNET

NGI COMMONS EVENTS PRIVACY STATEMENT

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SUMMARY

MARTEL GMBH and the project partners are processing your data in compliance with the GDPR and the Swiss Federal Act on Data Protection (revFADP / DSG) in the context of the NGI Commons project to:

- register you to the NGI Commons events and to populate participants lists,
- where applicable, set up networking activities for event participants,
- inform you about NGI Commons activities,
- provide access to resources,
- promote and document the NGI Commons activities,
- produce aggregated statistics

Your data will be kept no longer than five years after the completion of the project. You might be photographed or recorded for documentation and promotional purposes on the project and project partners web and social media handles. Data transfers outside the EU might happen, including to project partners located outside the EU, who will comply with the GDPR and to third parties. You have a right to view personal data, to rectification and, in some circumstances, to restriction of processing and to object. Contact **commons@ngi.eu**.

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INTRODUCTION

You are invited to participate and contribute to the activities of the NGI Commons project that is co-funded by the European Commission under the Horizon Europe Programme.

Your participation is voluntary, you are free to withdraw at any time before or during the activities you are involved in by contacting the people mentioned in the current form.

Before you decide whether or not to take part, please take some time to read the following information carefully. Please, feel free to ask questions if more information or clarifications are needed using the contact details in the last section of this sheet.

NGI COMMONS SCOPE

NGI Commons aims to elaborate on a long-term strategy for digital/internet commons, which are critical for Europe's sovereignty and trust creating a more coherent European funding landscape across both public and private sectors.

The project will contribute to the following outcomes expected by **HORIZON-CL4-2023-HUMAN-01-04 Call: Next Generation Internet Commons Policy**.

NGI COMMONS PARTNERS

The NGI Commons consortium consists of six partners:

- **MARTEL INNOVATE BV** – Coordinator, Netherlands
- **OPENFORUM EUROPE** – Partner, Belgium
- **CENTRE NATIONAL DE LA RECHERCHE SCIENTIFIQUE - CNRS** – Partner, France
- **STICHTING OPEN FUTURE** – Partner, Netherlands
- **MARTEL GMBH** – Associated Partner, Switzerland

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PROCESSING OF PERSONAL DATA

Your personal data will be processed in compliance with Regulation (EU) 2016/679 (General Data Protection Regulation - GDPR) and the Swiss Federal Act on Data Protection (revFADP / DSG). Where personal data is transferred to the European Commission (the contracting authority) for official project monitoring, reporting, and auditing, such transfers are governed by the GDPR. The European Commission will subsequently process and protect this received data in compliance with Regulation (EU) 2018/1725 (EUDPR).

We process your data based on the following legal bases:

- **Event Registration & Delivery (Article 6(1)(b) GDPR and Article 31(2)(a) Swiss revFADP):** Processing is necessary to perform contractual or pre-contractual steps requested by the participant—specifically, to register them, manage capacity limits, and grant physical or virtual access to the event.
- **Future Communications & Networking (Article 6(1)(a) GDPR and Article 31(1) Swiss revFADP):** Processing is based on your explicit, prior, and freely given consent to receive future newsletters, project updates, and to participate in voluntary participant networking directories.
- **Event Management, Evaluation, & reporting (Article 6(1)(f) GDPR and Article 31(1) Swiss revFADP):** Processing is necessary for the purposes of the legitimate interests pursued by the controller. The consortium holds a legitimate interest in evaluating event participation, compiling administrative lists, documenting activities, fulfilling mandatory reporting deliverables under the Horizon Europe Grant Agreement, and capturing general, non-targeted photography and videography of the event to document and promote the project's activities.

When we transfer data to the contracting authority, the European Commission, the data is handled based on:

- **Mandatory Oversight & Auditing (Article 5(1)(a) Regulation (EU) 2018/1725):** Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body—namely, the official monitoring, verification, and evaluation of Union-funded research programmes.

The data controller of the processing operation is MARTEL GMBH. Because MARTEL GMBH is established outside the EEA, its designated EU Representative under GDPR Article 27 is MARTEL INNOVATE B.V., KEIZERSGRACHT 482, 1017 EG Amsterdam, Netherlands. The registration platform used is Tito, the platform's privacy policy can be examined at https://ti.to/privacy.

The following entities may process your data, as data processors:

- **MARTEL INNOVATE B.V.**, KEIZERSGRACHT 482, 1017 EG Amsterdam, Netherlands
- **OPENFORUM EUROPE**, BOULEVARD CHARLEMAGNE 96, 1000 Bruxelles, Belgium
- **CENTRE NATIONAL DE LA RECHERCHE SCIENTIFIQUE – CNRS**, RUE MICHEL ANGE 3, 75794 Paris, France
- **STICHTING OPEN FUTURE**, DISTELWEG 279, 1031HD Amsterdam, Netherlands
- **MARTEL GMBH**, UBERLANDSTRASSE 111, 8600 Dubendorf, Switzerland

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The data collected are stored on Google Drive[1], managed by MARTEL GMBH.

The event is organised in the context of the NGI Commons project, which is funded by the European Union, your personal data (e.g., name, affiliation and email address) might be shared with authorised staff members from the European Commission (Unit E.4 - Internet of Things Directorate-General for Communications Networks). This work has received funding from the Swiss State Secretariat for Education, Research, and Innovation (SERI)[2].

The purposes of this data processing are:

- to register you to the NGI Commons events and meetings and to populate participants lists,
- where applicable, to set up networking activities for event participants,
- to inform you upcoming events, meetings, workshops and other activities organised in the context of the NGI Commons project,
- to provide access to resources linked with the NGI Commons project and events,
- to promote and document the NGI Commons activities,
- to produce aggregated statistics to monitor the performance of the project.

In addition, certain personal data may be collected based on your explicit prior consent, such as targeted close-up photography, direct video interviews, your social media account handles, comments you share, or contributions on interactive platforms used during the event (e.g., Particify).

For general event documentation and promotion, wide-angle photography and videography of the event settings (where you may appear in the background or as part of the crowd, but are not the specific subject of the capture) are processed based on our legitimate interest (Article 6(1)(f) GDPR). General sessions may also be audio/video recorded or web-streamed for live or future public dissemination.

We respect your preferences: if you do not wish to be recorded during virtual events, you are welcome to keep your camera and microphone disabled and participate using the chat function. For physical events, please notify our team at the registration desk so we can provide you with a non-recording lanyard or guide you to designated non-photography seating areas. Please note that while you can withdraw your consent or object to future publications at any time, we may not be able to completely remove materials that have already been distributed on printed media or third-party social media networks.

Third party tools are used to organise the event (user registration, interactions during the session and data storage):

- The participant registration platform used is **Ti.to** events registration management system.
  Terms of use and Privacy Policy: https://ti.to/privacy
  GDPR-compliant contract: https://help.tito.io/en/articles/2032680-does-tito-have-a-data-processing-agreement-dpa-for-gdpr-compliance
  Country: Ireland
- **Google Drive** is used to store participants and contact lists, privacy statement: https://www.google.com/drive/terms-of-service/

[1] Please note that Google Drive has its own Privacy Statement: https://www.google.com/drive/terms-of-service/
https://support.google.com/drive/answer/2450387?hl=en
https://policies.google.com/privacy?hl=en-US

[2] https://www.sbfi.admin.ch/sbfi/en/home.html

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Standard contractual clauses: https://cloud.google.com/security/compliance/eu-scc?hl=en
Country: Ireland

- **Particify** live interaction platform, terms and conditions and DPA: https://particify.de/datenschutzerklaerung
  Country: Germany
- Video streaming/conferencing systems might be used to web-stream the event. Software tools used will be one or a combination of the following:
  - **Jitsi** - https://jitsi.org/meet-jit-si-privacy/
    United Kingdom and Europe Supplement to 8x8 to 8x8 UCaaS/CCaaS Regional Terms: https://www.8x8.com/legal/order-terms/europe-supplement
    Country: United Kingdom
  - **BigBlueButton** - https://bigbluebutton.org/privacy-policy/
    https://bbbserver.com/data-privacy#sec-1-2
    Country: Germany

Your personal data will not be transferred to third countries or international organisations, except for data collected by the above-mentioned third-party services, which are governed by data processing agreements (DPAs) or standard contractual clauses in compliance with Article 28 of the GDPR and Article 9 of the Swiss revFADP to guarantee appropriate security and instructions, and to partners of the NGI Commons project based outside the European Union. This includes transfers to Martel GmbH (Switzerland). Switzerland is officially recognized by the European Commission as offering an adequate level of data protection through an adequacy decision under Article 45 of the GDPR. The data transfer from Switzerland to the countries detailed in the partners list and the third-party services list above happens in line with Art. 16 of the Swiss Federal Act on Data Protection (revFADP / DSG), and with the Swiss Data Protection Ordinance.[3]

PURPOSE AND DURATION

Your contact and personal data will be collected with the following purposes:

- Registration and listing of event participants
- Photo, video and audio recordings documentation of the event
- Statistics and indicators to assess the project performance (aggregated data)
- Creating and maintaining contact information lists to send updates and information on the project (consent is optional)

The participant registration and demographic data will be kept for as long as is considered necessary to fulfil the project's contractual obligations and no longer than five years after the completion of the project. Video, pictures and audio will be published on the social media and web outlets of the project and project partners. While third-party social media posts are naturally persistent, the NGI Commons project partners will review and archive or remove published media from active, project-managed web pages 5 years after the official conclusion of the NGI Commons project, in accordance with our data retention schedule and principles of storage limitation.

[3] https://www.fedlex.admin.ch/eli/cc/2022/568/en

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COLLECTED INFORMATION

By participating in this activity, you will be asked to provide us with the following information:

- Name, surname, email address, gender, organisation, type of organisation, country, affiliation to Associations, Topics of Interest,
- Photograph, video recorded / interview, personal statement on specific issues / topics / questions, etc. and any consequent communication and promotion activities on behalf of the project.

RIGHTS UNDER THE GDPR AND SWISS REVFADP

Right to view personal data (right of access)	You have a right of access to the data that are processed about you and to various other information.
Right to rectification (correction)	You have the right to have inaccurate personal data about you rectified.
Right to Erasure (right to be forgotten)	You have the right to obtain the erasure of your personal data without undue delay under certain circumstances, such as when you withdraw your consent and there is no other legal ground for processing (Article 17 GDPR).
Right to restriction of processing	In certain circumstances, you have the right to have the processing of your personal data restricted.
Right to object	In certain circumstances, you have the right to object to the otherwise lawful processing of your personal data by the responsible partner.
Right to data portability	You have the right to receive your personal data in a structured, commonly used, and machine-readable format, and have the right to transmit those data to another controller without hindrance (Article 20 GDPR).
Right to lodge a complaint	You have the right to lodge a complaint with a supervisory authority, in particular in the EU Member State of your habitual residence, place of work, or place of the alleged infringement, if you consider that the processing of your personal data infringes the GDPR (Article 77 GDPR).
Right to mark data as disputed (Switzerland) (right to contest)	In accordance with the Swiss Federal Act on Data Protection, you have the right to request that any of your personal data whose accuracy is disputed be formally marked as contested

For processing based on consent (such as newsletters, networking directories, or close-up media), you may retract your consent at any time without affecting the lawfulness of the processing before its withdrawal. For processing based on legitimate interests (such as general, wide-angle event photography and videography), you have the right to object to such processing at any time on grounds relating to your particular situation. To exercise these rights, please write to commons@ngi.eu. Your request to exercise one of the rights listed above will be dealt with within one month. If you wish to lodge a complaint, you may contact your local

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national Data Protection Authority (DPA) or the Swiss Federal Data Protection and Information Commissioner (FDPIC), as Martel GmbH is established in Switzerland.

CONTACTS

If you have any question or request related to the current project, activity, or data treatment process please contact **commons@ngi.eu**.

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