

## GDPR

### **Information on the processing of personal data within the vINCI platform**

From 25 May 2018, Regulation 2016/679 / EU on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46 / EC (hereinafter referred to as Regulation) will be applied in all states of the European Union. The aim of this Regulation is to create a uniform and uniform legislative framework throughout the EU that no longer requires national implementing measures.

#### **Document changes**

This Information on the processing of personal data is regularly updated; whenever we make a change, we will display it on our website [www.vinci.ici.ro](http://www.vinci.ici.ro) and we will notify you.

#### **Who we are**

We are the National Institute for Research and Development in Informatics, in short ICI Bucharest. We are the coordinators of the project "Clinically-validated INtegrated Support for Assistive Care and Lifestyle Improvement: the Human Link" and we host in our data center the project presentation site at [www.vinci.ici.ro](http://www.vinci.ici.ro)

In this Information on the processing of personal data:

- "we / ours" means vINCI integrated technology platform or vINCI platform (vINCI mobile App - Dashboard - innovative user-driven IoT devices in four standardized kits);
- "third party" means someone other than us or you.

Our headquarters are located at the National Institute for Research and Development in Informatics, 8-10 Maresal Averescu, Bucharest, Romania. We are registered in Romania under no. J40 / 11029/1999 with the name of the National Institute for Research and Development in Informatics - ICI Bucharest.

Our telephone number in the plant is +40213160736 or you can send us an e-mail at [vinci@ici.ro](mailto:vinci@ici.ro)

#### **Our principles**

The vINCI platform is committed to respecting your privacy. We take data

protection, security and compliance with personal data protection and privacy legislation seriously.

The vINCI platform, through its activity, uses personal data to provide the following services:

- user account registration in the mobile application / Dashboard;
- at the recruitment stage through the validated Older People's Quality of Life Questionnaire (OPQOL-35);
- User registration to fill in International Physical Activity Questionnaires (IPAQ) questionnaire.

In this context, the vINCI Platform makes every effort to align with the provisions of the Regulation, which is why it provides this information to all those involved.

Thus, the vINCI Platform will use as few personal data as possible and will also ensure the necessary conditions for the security of this data, in the event of cyber-attacks.

To the same extent, the vINCI Platform takes the necessary steps to reduce the number of processing of personal data and only to the extent that they are absolutely necessary for the activities it carries out.

### **Data processing**

The processing of personal data is performed for contractual and legal purposes, without the data being used for purposes other than those mentioned above.

The basis of the processing is the contracts concluded between vINCI platform and you and the applicable legal provisions (Article 6, paragraph (1) letter b.c.d, e, of the Regulation).

Thus, in order to facilitate the development of activities and in order to fulfill the legal obligations arising from the activity of ICI Bucharest, it is possible to communicate these data to public authorities, operators, third parties or other categories of recipients, insofar as the interest is legitimate, subject to legal provisions. and their protection is guaranteed.

### **The vINCI platform will process your personal data based on the following:**

- *Execution or conclusion* of the contract with you in order to purchase the services of the platform.
- *The legitimate interests of the vINCI Platform*, for example, preventing fraud, maintaining the security of the network and the services provided,

maintaining a high standard of security of your data. Whenever we rely on this legal basis to process your data, we evaluate our interests to ensure that they do not prevail over your rights. In addition, in some cases you have the right to object to such processing. For more information, please see the Your Rights section of this document.

- *Compliance with an imperative legal requirement*, including, for example, accounting and tax requirements, which are subject to strict internal policies (such as retention periods), procedures, and your right to restrict the use of your own data, which controls the subject matter of the services the legal assistance to be provided;
- *The consent you give* when the Vinci Platform is not based on any other legal basis. Consent may be withdrawn at any time.

## **THE PERSONAL DATA WHICH WE COLLECT**

According to the Regulation, personal data means "any information concerning an identified or identifiable natural person (" data subject "); an identifiable natural person is a person who can be identified, directly or indirectly, in particular by reference to an element of identification, such as a name, an identification number, location data, an online identifier, or to one or more specific elements, proper to his physical, physiological, genetic, mental, economic, cultural or social identity "(art. 4 of the Regulation)

In this regard, the VINCI platform can collect the following data:

- Name and surname, address, landline and / or mobile phone number, date of birth, sex and e-mail address;
- See the Cookies section for details on what we collect using cookies;
- Information we obtain from other sources, fraud prevention agencies, as well as other data providers. These include demographics, interest data, and online browsing behavior.

## **PURPOSE OF PROCESSING PERSONAL DATA**

### **1. To provide our service**

- To provide our services.
- We will contact you with messages to provide you with up-to-date information about our services, for example, about changes to our terms

and conditions or discontinuance of services.

## **2. To improve the services we offer you**

### **Improvements and innovations regarding our products and services**

- We collect anonymous information, without identifying elements or aggregates in order to improve the services we offer. None of this analytical data can lead to your identification.

## **3. Research and analysis**

We use a variety of analysis methods, including what is commonly referred to as "Big Data Analysis."

We use analyzes to:

- Market research and to conduct research and statistical analysis, including monitoring how customers use our networks, products and services, anonymously or in person;
- Providing reports to third parties (these reports do not contain information that could identify you as an individual).

## **4. Fraud prevention and security**

- We will process personal data for fraud protection and fraud detection purposes, to protect our networks and to detect misuse of your account or damage to our networks.

## **THE WAY WHICH WE EXCHANGE PERSONAL DATA**

### **International data transfers**

Currently, our data is stored in our locations in Romania and Slovenia.

We may need to transfer your information to other service providers in countries outside the European Economic Area (EEA). The EEA is made up of the countries of the European Union, Switzerland, Iceland, Liechtenstein and Norway: they are considered to have equivalent data protection and privacy laws. This type of data transfer may take place if our servers (ex: where we store data) or our suppliers and providers are located outside the EEA, or if you use our services and products while visiting countries outside this EEA.

If the VINCI platform transmits your information to a country outside the EEA, we will ensure that your information is properly protected. We will always ensure that there is an appropriate legal contract covering the transfer of data, in accordance with the

standards approved by the European Commission ([https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/model-contracts-transfer-personal-data-third-countries_en)). In addition, if it is considered that the country does not have laws equivalent to EU data protection standards, then we will ask the third party to conclude a legal contract that reflects these standards.

### **Duration of retention of your personal data**

We will store your information for as long as required by law. If there are no legal requirements, we will only store them for as long as necessary, based on the contract concluded with you. Unless the law provides otherwise, we will usually process your data during the existence of a contract between you and the vINCI platform.

### **Keeping your personal data safe**

We have specialized security teams that constantly analyze and improve the measures we have taken to protect your personal data against any unauthorized access, accidental loss, disclosure or destruction.

Internet communications (such as emails) are not secure if they are not encrypted. Your communications may cross several countries before being delivered, as this is the nature of the internet.

We cannot accept responsibility for any unauthorized access or loss of personal data beyond our control.

We will never ask you to provide us with your secure, personal or account information through an unsolicited means of communication. You are responsible for keeping your personal and account information safe and for not disclosing it to others.

The vINCI platform may contain links to third party websites. We are not responsible for the security and content of such third party sites. Therefore, be sure to read that company's data protection and cookie policy before using or posting personal information on their website.

The same applies to any third party sites or content that you connect to using our products and services.

You may choose to disclose your data in certain ways, such as social media plug-ins (including those provided by Google, Facebook, Twitter, and Pinterest) or using third-

party services that allow you to publicly post analytics or other information. and a third party could use that information.

Social network plug-ins and social applications are operated by the social network itself and respect the conditions of use and the policies of those networks regarding

## **YOUR RIGHTS**

Complaints regarding the processing of personal data may be addressed to the National Authority for the Supervision of Personal Data Processing.

According to the General Regulation on data protection 679/2016, individuals benefit from the right of access, rectification, deletion or portability of data, restriction of processing and opposition.

*Right of access* (Article 15 of the Regulation) - the right to obtain confirmation from the vINCI platform that your data is being processed or not, and if so, access to that data and information on how it is processed.

*The right to data rectification* (Article 16 of the Regulation) - the right to obtain from the Vinci platform, without undue delay, the rectification of your data. Also, the right to obtain the completion of personal data that are incomplete, including by providing an additional statement.

*The right to delete data* (the right to be forgotten - art. 17 of the Regulation) - the right to obtain from the vINCI platform the deletion of personal data, without undue delay. The vINCI platform has the obligation to delete personal data without undue delay if one of the following reasons applies:

- the data are no longer necessary for the purposes for which they were collected or processed;
- the person withdraws his consent on the basis of which the processing takes place and there is no other legal basis for the processing;
- the person opposes the processing and there are no legitimate reasons prevailing regarding the processing
- personal data have been processed illegally;
- personal data must be deleted in order to comply with a legal obligation incumbent on the vINCI platform under the Union or national law under which it is subject;
- personal data were collected in connection with the provision of

information society services.

*The right to restrict processing* (Article 18 of the Regulation) - the right to obtain from the vINCI platform the restriction of processing if one of the following cases applies:

- when the accuracy of the data is contested, for a period that allows the operator to verify the accuracy of the data;
- the processing is illegal, and the data subject opposes the deletion of personal data, instead requesting the restriction of their use;
- the vINCI platform no longer needs personal data for the purpose of processing, but the person requests them to establish, exercise or defend a right in court;
- the data subject has objected to the processing in accordance, and the data are restricted to the time frame in which it is verified whether the legitimate rights of the vINCI platform prevail over those of the person.

*The right to data portability* (Article 20 of the Regulation) - refers to the right to receive personal data in a structured, commonly used and automatically readable format and to the right to have this data transmitted directly to another controller, if this is technically feasible.

*The right to oppose* (Article 21 of the Regulation) - the right of the person to oppose, for reasons related to the particular situation in which he finds himself, the processing of personal data concerning him. The vINCI platform no longer processes personal data, unless it demonstrates that it has legitimate and compelling reasons justifying the processing and prevailing over the interests, rights and freedoms of the person or that the purpose is to establish, exercise or defend a right in court.

To exercise these rights, you can address a written request, dated and signed, sent to the project coordinator at National Institute for Research and Development in Informatics, 8-10 Maresal Averescu, Bucharest.

ICI Bucharest is registered in the Register of evidence of personal data processing with number 10458, all contact details being specified on the site.