

Title	Privacy Policy of CLARIN services
Version	1
Author(s)	Dieter Van Uytvanck
Date	2023-03-29
Status	Final
Distribution	Public
ID	CE-2023-2232



The CLARIN ERIC Service platform, provided via clarin.eu and all clarin.eu subdomains, (hereinafter referred to as "Site" or "Application") abides by the following principles when handling personal information:

1. We collect a small amount of personal information about our users in order to provide them with our content, products and services;
2. We limit the sharing or disclosure of this personal information to our needs or to comply with applicable legal requirements;
3. We give users meaningful choices over the use of their personal information;
4. We strive to protect the personal information that we hold.

This Privacy Notice describes the policies applied with respect to the personal information collected through the Site, or when the Site communicates with its users ("you" or "user"), and the choices that are made available to them. "Personal Information" means any information that relates to an identified or identifiable individual.

1. Your consent

Your use of the Site signifies that you agree to all terms of this Privacy Notice. If you communicate with us and provide us with personal information, we will assume that you agree that we can use this information to communicate with you. If you disagree with any part of this Privacy Notice, please do not use the Site or communicate with us.

2. Scope

This Privacy Notice applies solely to personal information that the Application collects through the Site or through any electronic communications that you send to the Application, as indicated on the Site (Personal Data). It does not apply to the websites of third parties, such as business partners or sponsors, to which the Site may link. The Application does not endorse, nor is responsible for the content of these third-party websites, or their policies or practices. If you provide any personal information to or through third party websites, your transaction will be subject to the terms and conditions and the privacy policies of these third-party websites.

3. What information we collect, and how we collect it.

The Application manages different types of data, all in compliance with the current European legislation on Data Protection. Any Data concerning the User is collected to enable CLARIN ERIC to provide its services, as well as for the following purposes: tag management, displaying content from external platforms, analytics, contacting the user, managing contacts and sending messages, Interaction with data collection platforms and other third parties. Among the types of Personal Data that this Application collects, by itself or through

third parties, are: cookies, usage data, first name, last name, email address, various types of data including User affiliation and country.

Data voluntarily supplied by the User - The web platform is designed to allow users to browse through it without providing any contact information. However, certain areas may require, or allow for, the submission of personal information. As an example, clients of the Application need to register to become part of the web site community and use the Application solutions. The data collected and further processed are necessary to access the Application, as well as for communication and follow-up activities. Said consent may be revoked at any time, whereby the ability to use the service in question ceases.

CLARIN ERIC Service usage activity and user-collected information - Users of the platform are mainly unauthenticated or authenticated end-users who access and browse the Site. Usage events and statistics are collected by the Platform and then analyzed to produce consolidated statistics and recommendations for related searches for the user.

The following information about user visits is collected in the CLARIN ERIC Service database:

1. the user unique identifier,
2. first name,
3. last name,
4. email,
5. reason for accessing CLARIN services,
6. country of origin,
7. customer typology, i.e., researcher, citizen, educator, provider,
8. organization/company,
9. country of collaboration,
10. webpage of the CLARIN ERIC service accessed.

Users are responsible for any third-party Personal Data obtained, published or shared through this Application and confirm that they have the third party's consent to provide the Data to CLARIN ERIC.

Cookies - Any cookies or other tracking tools used by this Application, or by the owners of third-party services used through this Application, serve the purpose of providing the service required by the User, in addition to any other purposes described in the present document and in the Cookie Policy, if available.

4. Where and How the Data is processed

Location - The Data is processed at the Data Processor's operating offices and in any other places where the parties involved in the processing are located. For further information, please contact us at clarin@clarin.eu.

Duration of Processing - Data processing is limited to the time necessary to perform the service requested by the User. However, the User can ask at any time to interrupt the processing of the Data or have Data canceled.

Log information - Our server software automatically gathers general information from all users. For example: IP address, computer type, screen resolution, OS version, domain name, location, date and time of the visit, page(s) visited, time spent on a page, website from which the user came, action taken by the user when leaving our Site. Some of this

information is provided directly by the user's browser, the remainder is obtained through cookies and tracking technologies.

Registration information - Webinars and other events may be provided with the assistance of unaffiliated third-party vendors, which may require that the vendors have access to personal information such as name, company, and email address. These vendors will provide us with this information, so that we can keep track of who registers to, or attends these events. In this case, the information that you provide as part of this registration will be subject to both our Privacy Notice and the applicable privacy statement posted on the vendor's website.

Children - The Site is not intended for children. Nor does the Application knowingly collect personal information from children.

5. How we use this information

The Application uses personal information for the following:

1. **Fulfillment of requests** - We may use your personal information to deal with your inquiries, register you to our events, and send you the publications or documents that you request.
2. **Internal business purposes** - We may use the collected information for internal business purposes, such as for audits or to track attendance at events.
3. **Site operation** - We use cookies to assign a unique identifier to a user's computer.
4. **Statistical analysis** - We use aggregated data about Site usage (which do not identify a specific user), such as the number of users who have visited certain pages of the Site, or how long users are spending on a particular page, in order to develop statistics as to the use of the Site, so that we can understand how users interact with the Site, to improve its content, products, or services.
5. **Displaying content from external platforms.**

6. To whom your personal information is disclosed

The **Data Controller** is responsible for the Data of Users in a proper manner and takes appropriate security measures to prevent unauthorized access, disclosure, modification, or destruction of the Data.

Data Controller:
CLARIN ERIC
Drift 10
3512 BS Utrecht
The Netherlands

The Data processing is carried out using computers and/or IT enabled tools, following organizational procedures and practices strictly related to the purposes indicated. **The Data Processor** processes the Data of Users in a proper manner and shall take appropriate security measures to prevent unauthorized access, disclosure, modification, or unauthorized destruction of the Data.

Data Processor
CLARIN ERIC
Drift 10

3512 BS Utrecht
The Netherlands
Email: clarin@clarin.eu

In addition to the Data Controller and Data Processor, in some cases, the Data may be accessible to certain types of persons in charge, involved with the operation of the site (administration, marketing, legal, system administration) or external parties (such as third-party technical service providers, mail carriers, hosting providers, IT companies, communications agencies) appointed, if necessary, as Data Processors by CLARIN ERIC. The updated list of these parties may be requested from the Data Controller at any time.

The Application Members - We may share personal information with members of CLARIN ERIC for the purpose of creating a knowledge base and potential customer leads for the exploitation of results and assets.

Law enforcement; compliance - We may use or disclose personal information to any third party (a) if we believe that we are required to do so by law; (b) to comply with legal processes or respond to requests from governmental or public authorities; (c) to prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of the Site or network; (d) to enforce our Terms and Conditions; or (e) to protect the rights, privacy, property, business, or safety of the Application, its business partners, employees, members, Site users, or the public. Unless prohibited by applicable law, we will inform you if a third party requests access to personal information about you.

7. Right to access and rectification

You have the right to have access to the personal information that we hold about you, and to have this information corrected and amended, as defined in the GDPR art. 12, 15, 16. To do so, please contact us as indicated in section 15. However, please be aware that in some cases, the administrative and technical burden associated with the retrieval of archived data may be substantial. We would need to be compensated for this effort in a manner that is consistent with our actual cost.

8. Right to erasure

You have the right to request that we delete any Personal Information that we hold about you. The Application is compliant with the Right to Erasure as defined in the GDPR, art. 17. If you would like us to erase the Personal Information that we hold about you, please contact us at clarin@clarin.eu.

9. Right to object

You have the right to object at any time to the processing of your personal data, on grounds relating to your particular situation, as defined in the GDPR, art. 21. Please note that all the data you provide on this website will be used only for delivery of the services provided by the Application, as described in section 5. If you would like to apply your right to object, please contact us by email at clarin@clarin.eu.

10. Retention of information

We will retain personal information about a user for as long as necessary to fulfill the purposes outlined in this Privacy Notice, unless a longer retention period is required by law and/or regulations. The User can always request that the Data Controller suspends or removes the data.

11. Security

The Application seeks to adopt commercially reasonable security measures consistent with industry practice to protect personal information under its control against loss, misuse, and alteration. However, we cannot guarantee the security of our servers, the means by which personal information is transmitted between your computer and our servers, or any personal information that we receive through or in connection with the Site. We attempt to strike a reasonable balance between security and convenience. Emails are usually sent as unencrypted text. If misrouted or intercepted, an unencrypted email could be read easily. If there is a matter that requires high security or confidentiality, please keep us informed about the sensitivity of the information, and do not send the related information by email.

12. Jurisdiction

The Application does not represent or warrant that the Site is appropriate or available for use in any particular jurisdiction. Those who choose to access the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules, and regulations that apply to them. We may limit access to the Site to any person, geographic area, or jurisdiction that we choose, at our sole discretion.

13. Inquiries and Complaints

If you have any questions, comments, or complaints about this Privacy Notice, or the use, management or disclosure of personal information collected on or through our Site, please contact us at clarin@clarin.eu.

14. Updates to the Privacy Notice

We update this Privacy Notice from time to time. If the changes are significant, we will post prominent notification on this Site for a reasonable time to inform you of these changes. Unless, and until, you object in writing, by contacting us clarin@clarin.eu, all changes will apply to the existing information about you that the Application already holds, and the personal information collected from the effective date of the revised Privacy Notice. Your use of the Site following the effective date of any revision will constitute your acceptance of the terms of the updated Privacy Notice.

15. How to contact Us

If you have any questions, comments, or complaints, regarding this Privacy Notice, or our privacy, security or data protection practices, please contact us by email at clarin@clarin.eu.