

# Privacy Policy

We are pleased that you are visiting our website! Data protection is a matter of trust and your trust is important to us.

The protection of personal data is particularly important to us. We would therefore like to take this opportunity to inform you which of your personal data we collect when you visit our website, for what purposes it is used and to whom we may make it available.

We declare our compliance with the statutory provisions on data protection and data security. In particular, data is used exclusively for the purposes specified below and measures are taken to guarantee data security by ensuring that data is used properly and is not made accessible to unauthorised persons. Clients, service providers and their employees are obliged to maintain the confidentiality and secrecy of the data disclosed by us, unless there is a legally permissible reason for transferring or disclosing the data entrusted or made accessible.

This privacy policy applies to the controller's website which can be accessed under the domain <https://DATA4CIRC.eu/> and the various subdomains (hereinafter referred to as 'our websites'). We reserve the right to adapt the data protection declaration with effect for the future, in particular in the event of further development of the website, the use of new technologies or changes to the legal basis or the corresponding case law.

You can print or save the privacy policy by using the usual functionality of your browser. We recommend that you enclose a printout of the privacy policy with your documents.

## 1 Name and address of the Controller

The controller pursuant to Art 4(7) of the EU General Data Protection Regulation (GDPR) is:

IDENER Research and Development AIE.

**Address:** C/ Gonzalo Jimenez de Quesada, 2, Tower, Floor 11, 41092 Sevilla

**Phone:** +34 954 460 278

**E-Mail:** [data4circ-controller@idener.ai](mailto:data4circ-controller@idener.ai)

**Website:** <https://idener.ai/>

## 2 Name and address of the Processor

EIT Manufacturing East GmbH

**Address:** Christine-Touaillon-Straße 11/29

1220 Vienna

**Phone:** +43 660 43 660 60

**E-Mail:** [east@eitmanufacturing.eu](mailto:east@eitmanufacturing.eu)

**Website:** <https://www.eitmanufacturing.eu/in-your-country/east-region/>

## 3 Name and address of the data protection officer

The data protection officer is:

Nuno Alves

c/o LOBA.cx

Edifício Rainha, 12th Floor

3720-232 Oliveira de Azeméis, Portugal

**Phone:** +351 256 668 413

**E-Mail:** [data4circ-dpo@idener.ai](mailto:data4circ-dpo@idener.ai)

**Website:** <https://www.loba.com/en>

## 4 General information on data processing

### 4.1 Scope of the processing of personal data

Personal data is any information relating to an identified or identifiable natural person. We collect and use our users' personal data only to the extent necessary to provide a functional website and to display and present our content and services. The collection and use of our users' personal data only takes place with the user's consent. An exception applies in cases where it is not possible to obtain prior consent and the processing of the data is permitted by law.

## 4.2 Legal basis for the collection and processing of your personal data

- - Insofar as we obtain the consent of the data subject for the processing of personal data, Art. 6 para. 1 lit. a GDPR serves as the legal basis for the processing of personal data.
- - When processing personal data that is necessary for the fulfilment of a contract to which the data subject is a party, Art. 6 para. 1 lit. b GDPR serves as the legal basis. This also applies to processing operations that are necessary for the implementation of pre-contractual measures.
- - Insofar as the processing of personal data is necessary to fulfil a legal obligation to which the controller is subject, Art. 6 para. 1 lit. c GDPR serves as the legal basis.
- - In the event that vital interests of the data subject or another natural person require the processing of personal data, Art. 6 para. 1 lit. d GDPR serves as the legal basis.
- - If the processing is necessary to safeguard a legitimate interest of the controller or a third party and if the interests, fundamental rights and freedoms of the data subject do not outweigh the first-mentioned interest, Art. 6 para. 1 lit. f GDPR serves as the legal basis for the processing.

## 4.3 Data erasure and storage duration

The personal data of the data subject will be deleted or blocked as soon as the purpose of storage no longer applies. Data may also be stored if this has been provided for by the European or national legislator in EU regulations, laws or other provisions to which the controller is subject. The data will also be deleted or blocked if a storage period prescribed by the aforementioned standards expires, unless there is a need for further storage of the data for the conclusion or fulfilment of a contract.

## 5 Provision of the website and creation of log files

When you access and use our website, we collect the personal data that your browser automatically transmits to our server. This information is temporarily stored in a so-called log file. When you use our website, we collect the following data, which is technically necessary for us to display our website to you and to ensure stability and security:

- Information about the browser type and version used
- The user's operating system
- The user's internet service provider

- The IP address of the user
- Date and time of access
- Websites from which the user's system accesses our website
- Websites that are accessed by the user's system via our website

The data is also stored in the log files of our system. This does not affect the user's IP addresses or other data that allows the data to be assigned to a user. This data is not stored together with other personal data of the user.

## 5.1 Legal basis for the processing of personal data

Art. 6 para. 1 lit. f GDPR serves as the legal basis for the abovementioned data processing. The processing of the abovementioned data is necessary for the provision of a website and thus serves to safeguard a legitimate interest of our company.

## 5.2 Storage duration

Temporary storage of the IP address by the system is necessary to enable delivery of the website to the user's computer. For this purpose, the user's IP address must remain stored for the duration of the session.

## 6 Use of Cookies

Our website uses cookies. Cookies are small text files that are stored locally in the cache of the browser used. When a user accesses our website, a cookie may be stored on the user's operating system. This cookie contains a characteristic string of characters that enables the browser to be uniquely identified when the website is called up again. Cookies do not become part of the PC system, cannot execute programmes and cannot contain viruses. We use cookies to make our website more user-friendly. Some elements of our website require that the accessing browser can be identified even after a page change. The use of cookies may be technically necessary or for other purposes.

Various cookies are used on our websites, the type and function of which differ.

Further information on the cookies used can be found at <https://DATA4CIRC.eu/cookie-policy-eu/>.

## 7 Contact form and Community form

### 7.1 Scope of the processing of personal data

Contact forms and community forms are available on our website which can be used to contact us electronically. If a user makes use of this option, the

data entered in the input mask will be transmitted to us and stored. The following data may be collected via the contact forms:

- Title
- First Name
- Last Name
- Email

The following data may be collected via the community forms:

- First Name
- Last Name
- Email
- Role
- Country
- Interest in specific Communities

This information is provided on a voluntary basis and is initiated by you. If the data you provide is information for contacting us, we will use these channels to contact you in accordance with your request. Your consent is obtained for the processing of the data as part of the sending process and reference is made to this privacy policy.

## 7.2 Purpose of data processing

The purpose of data processing is to provide the option of contacting us via the contact form.

## 7.3 Storage duration

The data will be deleted as soon as the purpose of the processing has been achieved and provided that there is no other statutory retention period to the contrary. The conversation is terminated when it can be inferred from the circumstances that the matter in question has been conclusively clarified. In this context, the data will not be passed on to third parties without your consent.

## 7.4 Legal basis for the processing of personal data

The legal basis for the processing of the data is Art. 6 para. 1 lit. a GDPR if the user has given consent.

The legal basis for the processing of data transmitted within sending an e-mail is Art. 6 para. 1 lit. f GDPR.

If the e-mail contact is aimed at the conclusion of a contract, the legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

## 8 E-Mail-Contact

### 8.1 Scope of the processing of personal data

You can also contact us via the e-mail address provided. In this case, the user's personal data transmitted with the e-mail will be stored. The data will only be used to process your request or for the purpose of contacting you.

### 8.2 Purpose of data processing

The purpose of data processing is to provide the option of contacting us via contact form or e-mail.

### 8.3 Storage duration

The data will be deleted as soon as the purpose of the processing has been achieved and provided that there is no other statutory retention period to the contrary. The conversation is terminated when it can be inferred from the circumstances that the matter in question has been conclusively clarified. In this context, the data will not be passed on to third parties without your consent.

### 8.4 Legal basis for the processing of personal data

The legal basis for the processing of data transmitted within sending an email is Art. 6 para. 1 lit. f GDPR.

If the e-mail contact is aimed at the conclusion of a contract, the legal basis for the processing is Art. 6 para. 1 lit. b GDPR.

## 9 Newsletter

### 9.1 Scope of the processing of personal data and description of the double opt-in procedure

You can subscribe to a free newsletter [on our website](#). When you register for the newsletter, your e-mail address from the input mask is transmitted to us. Registration for our e-mail newsletter is carried out using the double opt-in procedure. We will then send you a confirmation e-mail to the e-mail address you have provided, in which we ask you to confirm your subscription to the newsletter again. You can finalise your subscription to the newsletter by clicking on the confirmation link you receive. With the help of the double opt-in procedure, we can ensure that this is your e-mail address and that you wish to receive our e-mail newsletter.

The following data is also processed at the time of subscription:

- IP address
- Date/time of subscription to the newsletter
- Time of your confirmation of the confirm link

If confirmation is not received within 24 hours, we will block the information transmitted to us and delete it automatically after one month at the latest.

To send our newsletter, we use the services of:

Intuit Mailchimp

405 N Angier Ave. NE

Atlanta, GA 30308 USA

The privacy policy of Intuit Mailchimp is available at

<https://www.intuit.com/privacy/statement/>

### 9.2 Purpose of data processing

The collection of the user's e-mail address when registering for the newsletter serves to deliver the newsletter. The collection of other personal data as part of the registration process serves to prevent misuse of the services or the e-mail address used.

### 9.3 Storage duration

The data is deleted as soon as it is no longer required to fulfil the purpose for which it was collected. The user's e-mail address is therefore stored for as long as the subscription to the newsletter is active.

If the confirmation link is not confirmed within 24 hours, the transmitted information is blocked and automatically deleted after one month at the latest.

## 9.4 Legal basis for the processing of personal data

The legal basis for the processing of data after the user has registered to receive the newsletter is Art. 6 para. 1 lit. a GDPR if the user has given consent.

## 9.5 Withdrawing your consent

You can withdraw your consent to the processing of your email address for the purpose of receiving the newsletter at any time by clicking directly on the unsubscribe link contained in the newsletter. This does not affect the lawfulness of the processing carried out on the basis of the consent until the withdrawal.

# 10 Use of web analysis tools

In order to make our website as pleasant and convenient as possible for you as a user, we occasionally use the services of external service providers. In the following, you have the opportunity to find out about the use and utilisation of the services and functions used so that you can also exercise your rights with the service providers if necessary.

If you have given your consent in the cookie banner, our website uses functions of web analysis services. Cookies are used for this purpose, which make it possible to analyse the usability of the website by its users. The information generated in this way is transferred to the provider's server and stored there.

The use of statistics and marketing cookies requires your consent in accordance with Art. 6 para. 1 lit. a GDPR. When you visit our website for the first time, a cookie banner opens where you can give your express consent to the use of statistics and marketing cookies.

## 10.1 Web analysis tool Burst Statistics

### 10.1.1 Scope of the processing of personal data

This website uses 'Burst Statistics', a WordPress statistics plugin for the statistical analysis of page views, visitors, referrals, search terms, etc. Burst Statistics uses cookies that enable your use of the website to be analysed.

Burst Statistics is a data protection-friendly statistics tool for analysing visitor behaviour. For this purpose, we collect anonymised data on this website,

which is stored locally without sharing it with others. We cannot use this data to establish any connection to your person.

Specifically, the following data is collected:

- Analysis of page views
- Number of sessions and the average duration per session
- Number of visitors
- Bounce rate
- Device type (desktop, laptop, mobile)

The provider of Burst Statistics is Complianz B.V., Kalmarweg 14-5, 9723 JG Groningen, Netherlands. The privacy policy of Burst Statistics is available at <https://burst-statistics.com/legal/privacy-statement-eu/>

### 10.1.2 Purpose of data processing

By processing the personal data of our users, we are able to create an analysis of the surfing behaviour of our users. We use the analyses created by Burst Statistics to compile reports on website activity so that we can constantly improve our website and adapt it to the needs of our users.

### 10.1.3 Storage duration

The data retention period in Burst Statistics is set to 12 months. The cookies set are valid for up to 13 months.

### 10.1.4 Legal basis for the processing of personal data

The legal basis for the use of cookies is your express consent in accordance with Art. 6 para. 1 lit a GDPR. You can withdraw this consent for the future at any time by deactivating cookies in your browser settings.

## 11 Use of Plugins

Our websites contain plugins from social networks. Please note that EIT Manufacturing East GmbH has no influence on whether and to what extent the respective service providers collect personal data. We are not aware of the scope, purpose and storage periods of the respective data collection. However, we would like to point out that it must be assumed that at least the IP address and device-related information is used and collected via plugins. It is also possible that the respective service providers use cookies.

When using the plugins, personal data may be transferred to countries outside the EU/EEA, in particular to the USA.

For the scope and purpose of data collection by the respective service and the further processing and use of your data there, please refer to the data protection information directly from the website of the respective service. There you will also find further information about your corresponding rights and suitable setting options to protect your privacy. The plugins used are listed below.

The legal basis for the integration of plugins and the processing of personal data is your consent in accordance with Art. 6 para. 1 lit. a GDPR. You can withdraw your consent at any time. The withdrawal of your consent does not affect the lawfulness of the processing up to the time of withdrawal.

## 11.1 Use of YouTube Plugins

We use plug-ins on our website from the video platform YouTube.com, a service operated - represented by Google - by YouTube LLC (head office at 901 Cherry Avenue, San Bruno, CA 94066, USA; hereinafter referred to as 'YouTube').

Using the plugins, we can also embed visual content ('videos') that we have published on Youtube.de or Youtube.com on this website. When you visit the website, YouTube receives the information that you have accessed the corresponding subpage of our website. Access data is also transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data will be assigned directly to your personal user account. If you do not wish your data to be associated with your YouTube profile, you must log out before activating the button. YouTube stores your data as user profiles and processes them for the purposes of advertising, market research and the customised design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) to provide customised advertising.

Further information on the handling of user data can be found in YouTube's privacy policy at

<https://policies.google.com/privacy?hl=de&gl=de>.

### 11.1.1 Two-click solution

We use plug-ins on our website from the video platform YouTube.de or YouTube.com, a service operated - represented by Google - by YouTube LLC

(head office at 901 Cherry Avenue, San Bruno, CA 94066, USA; hereinafter referred to as 'YouTube').

Using the plugins, we can also embed visual content ('videos') that we have published on YouTube.com on this website. In order to increase the protection of your data when you visit our website, plugins from the provider YouTube are initially integrated into the website using a so-called '2-click solution'. This integration ensures that no connection to the provider's servers is established when a page of our website containing such plugins is accessed. Videos from the YouTube platform are initially only integrated as graphics; your browser only establishes a direct connection to the provider's servers when you activate the plugin (by clicking on it) and thus give your consent to data transmission. The content of the plugin is then transmitted by the provider directly to your browser and integrated into the page. Access data is also transmitted. This occurs regardless of whether YouTube provides a user account through which you are logged in or whether no user account exists. If you are logged in to Google, your data will be assigned directly to your personal user account. If you do not wish your data to be associated with your YouTube profile, you must log out before activating the button. YouTube stores your data as user profiles and processes them for the purposes of advertising, market research and the customised design of its website. Such an evaluation is carried out in particular (even for users who are not logged in) to provide customised advertising.

Further information on the handling of user data can be found in YouTube's privacy policy at

<https://policies.google.com/privacy?hl=de&gl=de>.

## **12 Rights of the subject**

If your personal data is processed, you are a data subject within the meaning of the GDPR and you are entitled to the rights listed below vis-à-vis the controller.

- Right of access (Art. 15 GDPR);
- Right to rectification (Art. 16 GDPR);
- Right to erasure (Art. 17 GDPR);
- Right to restriction of processing (Art. 18 GDPR);
- Right to data portability (Art. 20 GDPR);
- Right to object (Art. 21 GDPR).

If you receive our newsletter, you have the right to withdraw your consent to receive it without affecting the lawfulness of processing based on consent before its withdrawal.

## 12.1 Right to lodge a complaint with a supervisory authority

Without prejudice to any other administrative or judicial remedy, you have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement if you consider that the processing of personal data relating to you infringes the GDPR.

The supervisory authority with which the complaint has been lodged shall inform the complainant on the progress and the outcome of the complaint including the possibility of a judicial remedy pursuant to Art. 78 GDPR.

If you believe that the processing of your data violates data protection law or that your data protection rights have been violated in any other way, you can lodge a complaint with the competent supervisory authority.

In Austria, this is the Data Protection Authority, Barichgasse 40-42, 1030 Vienna, telephone: +43 1 52 152-0, e-mail: [dsb@dsb.gv.at](mailto:dsb@dsb.gv.at), website: <https://www.dsb.gv.at/>.

## 13 Hyperlinks to other websites

On our websites we use so-called hyperlinks to the websites of other providers. When these hyperlinks are activated, you are forwarded directly from one of our websites to the website(s) of other providers. You can recognise this by the change of URL, among other things. We cannot accept any responsibility for the confidential handling of your data on the websites of third parties, as we have no influence on whether these companies comply with data protection regulations. Please refer directly to these websites for information on how these companies handle your personal data.

## 14 Data security

We are committed to protecting your privacy and treating your personal data confidentially. In order to prevent manipulation, loss or misuse of your data stored by us, we take extensive technical and organisational security precautions, which are regularly reviewed and adapted to technological progress.

However, we would like to point out that due to the structure of the Internet, it is possible that the rules of data protection and the above-mentioned security measures may not be observed by other persons or institutions outside our area of responsibility. In particular, unencrypted data - e.g. when sent by e-mail - can be read by third parties. We have no technical influence

on this. It is the responsibility of the user to protect the data provided by him/her against misuse through encryption or in any other way.

## **15 Privacy Policy Update**

Due to the further development of our apps and services, websites, newsletters and the content and services we offer, it may become necessary to amend this privacy policy. We reserve the right to amend the privacy policy at any time with effect for the future. The current version is available at [www.DATA4CIRC.eu/imprint](http://www.DATA4CIRC.eu/imprint). We recommend that you read the current privacy policy again from time to time.

27<sup>th</sup> of April, 2026