



PRIVACY NOTICE

How we protect your data and privacy rights and comply with the General Data Protection Regulation (GDPR)

Why Privacy matters to us

The KEYSTONE project and its partners take privacy very seriously. We understand that people's personal information matters to them. We understand that people expect their personal data and privacy to be protected. That's why KEYSTONE has a clear Data Protection and Privacy Policy in place. It complies with the General Data Protection Regulation (GDPR) – which applies in all EU countries in which KEYSTONE operates. The policy ensures that we will only use personal information to help us carry out our research and to help us disseminate its results.

This document sets out how we will put the policy into practice over the lifetime of the project. It covers:

- Who we are and who is responsible for data protection and privacy in the project
- What information we collect
- What we do with this information
- What legal basis we have for processing your personal data
- When we share personal data
- Where we store and process personal data
- How we secure personal data
- How long we keep your personal data for
- Your rights in relation to personal data
- Use of automated decision-making and profiling
- How to contact us.

This Privacy Notice applies to all of the activities carried out in the KEYSTONE project. It sets out our approach to personal information and privacy generally. Additional notices on specific project activities – for example a research activity we carry out – will be issued as and when necessary.

Please read this Privacy Notice carefully and contact us with any questions you may have using the contact details set out in the Section below on 'How to Contact Us'.



Who we are and who is responsible for data protection and privacy

KEYSTONE is a research project funded by the European Union under the 'Erasmus+' Programme. It has five research partners: Arcola Research (UK), International University La Rioja (Spain), Borgorete (Italy), M2I (Greece), Catholic University of Portugal (Portugal). The project Data Protection and Ethics Committee is responsible for overall data protection and privacy and has three members. The project Data Protection Officer is responsible for day-to-day data protection and privacy.



What information do we collect?

We collect the following information:

- 'Personal data' – e.g. names and e-mails - of people who register for our Training Programme
- 'Personal data' – e.g. names and e-mails - of people who complete a 'contact form', sign up for our 'Newsletter' or who ask for information about our Events
- 'Personal data' – i.e. gender, location and economic, cultural and social identity data – and 'Sensitive Personal Data' – i.e. ethnic origin – of people who take part in some of our research activities, for example completing a survey questionnaire or an interview on their participation in the KEYSTONE project



What do we do with this information?

We use the information we collect to:

- Identify whether the outcomes gained from participating in the KEYSTONE project are different for people from different backgrounds
- Send the results of our research to different audiences
- Invite people to take part in project events
- Gather information from people who participated in project events on their experience of the event



What legal basis do we have for processing your personal data?

There are six 'legal grounds' for processing personal data contained within the GDPR. We process personal data on the basis of two of these legal grounds:

- Consent – we only process personal data on individuals who have given their clear consent for us to process their data for a specific purpose - for example analyzing data collected from people who take part in the KEYSTONE Training Programme so we can find out if it works. We have very clear rules on 'consent'. These are set out below in the section 'What are your rights in relation to personal data'
- Legitimate interests – we process personal data when it is necessary to support the project objectives, for example by contacting people who have given us their e-mail contact so we can invite them to a project event



When do we share personal data?

We do not expect any situation arising in KEYSTONE where personal data will be shared with any organization other than those partners who are members of the project Consortium – i.e. the nine partners mentioned above. Other data that may possibly be shared outside the consortium – for example databases compiled from information collected through a participant survey – will be completely anonymized.



Where do we store and process personal data?

Personal data is stored and processed in secure systems in the organisations of the KEYSTONE partners. We treat all personal data confidentially and take steps within the project to ensure it is kept confidential. All partners involved in KEYSTONE have been issued with a Project Management Handbook that sets out the KEYSTONE data protection, privacy and ethics policy and which includes Guidelines and a checklist of how this policy needs to be put into practice. This policy emphasizes that personal data needs to be protected according to the EU GDPR and the laws of the country in which each partner operates. Each partner has signed a 'Code of Conduct' committing them to adhere to this policy and Guidelines.



How do we keep personal data secure?

Each KEYSTONE partner is committed to putting systems and processes into place to ensure that personal data is secure. These include:

- Protection against accidental loss – by ensuring data are kept in secure systems on partner premises and are ‘backed up’
- Prevention of unauthorized access, use and disclosure – through using secure passwords
- Restriction of access to personal information – only authorized personnel are allowed to handle personal data
- Data Protection and Privacy Impacts Assessments – these are carried out when new technologies are introduced or when data processing is likely to result in a high risk to the rights and freedoms of individuals



How long do we keep your personal data for?

We will only keep personal data for as long as is necessary to carry out our research objectives. This means in practice that no personal data will be kept after two months following the official end of the KEYSTONE project, which is scheduled for 31st January 2020.



What are your rights in relation to personal data?

In respect of your personal data you have the right to:

- have full access to the personal information we collect about you
- ensure that incorrect information about you is corrected or deleted
- withdraw your consent to the processing of your personal data at any time
- obtain and reuse your personal data for your own purposes
- receive personal data or move, copy or transfer that data in a safe and secure way, without hindrance
- lodge a complaint with a relevant national Information Commission Office or equivalent

You can exercise these rights at any time by contacting us – see the Section below ‘How to Contact Us’ – or by contacting a relevant national Information Commission Office or equivalent.



Use of automated decision-making and profiling

All personal data processing in KEYSTONE is done by humans. We do not use ‘machine-processing’ in decision-making or profiling.



How to contact us

If you have questions or concerns about our privacy practices, your personal information, or if you wish to file a complaint you can do so at any time using the following channels:

- On-line – click the ‘Contact’ tab on the KEYSTONE website Home page. Make sure you specify the nature of your query or complaint in the ‘Subject’ and ‘Message’ boxes
- E-mail – send an e-mail about your query or complaint to the KEYSTONE Data Protection Officer at admin@arcola-research.co.uk
- By post – send a letter to: KEYSTONE Data Protection Officer, Arcola Research LLP, 6 Alvington Crescent, London E8 2NW, UK