

# Digital Enabler - Privacy Policy

Version v1.0

Last Updated: 20th May 2019

Engineering Ingegneria Informatica SPA, with its registered office in Piazzale dell'Agricoltura, 24, 00144 Rome (hereinafter "ENG") is lead contractor and will act as Data Controller. For any information concerning the processing of your personal data by ENG, you can write to the following address: [dpo.privacy@eng.it](mailto:dpo.privacy@eng.it)

This document was drafted pursuant to art. 13 of EU Regulation 2016/679 (hereafter: "GDPR") in order to inform users about the privacy policy that is applied when their personal data are handled through the Digital Enabler (hereinafter collectively "Site" or "DE"). The privacy policy is compliant to the rules of the GDPR, thus any treatment carried out by ENG will be based on principles specified by Art.5. (e.g. lawfulness, fairness and transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and accountability).

The Digital Enabler is an Internet of Everything platform that has two primary objectives, which in their complementarity, put into practice a holistic vision of smart city and urban-scale innovation. Such objectives are: i) to provide a data-driven, open, standard-oriented, user-centric, privacy-preserving and service-based platform for European smart cities, providing all the necessary technological elements for enabling city-scale co-creation and experimentation/deployment of IoE services and applications; ii) to support long-term sustainability of the platform by guaranteeing re-use and portability of urban IoE services and applications through no city lock-in and no vendor lock-in, and by defining a systemic and multi-domain approach to urban innovation in which every actor of the community (city manager, data provider, citizen, business, developer, ...) has a clear benefit.

## 1. Collected information

The Digital Enabler collects only data strictly needed to validate the experimentations in Phase 3 of the Select4Cities PCP. This includes:

- contact information,
- username and password;
- content, metadata and any information the user provides when using the Digital Enabler, such as position and health data;
- content and any information that other people provide when they use the Digital Enabler and that include information about the user;
- any personal data provided by the user on a voluntary basis, like age, gender, photo, age and social media accounts.

**As the Digital Enabler includes features for supporting communities, all members of the community (the users) will be able to see other users' accounts and all the contents they created.**

## 2. Purpose of the treatment

- a) Enable the user to access and use DE;
- b) Enable the user to communicate with other users;
- c) Provide customer service and respond to requests for assistance or information, whenever the user contacts us;
- d) Send the user news/updates regarding the contents/resources subscribed;
- e) Operate, protect, improve, and optimize the DE and the user experience, such as by performing analytics and conducting research.
- f) Enable third party applications to access the user's personal data. This is possible thanks to the DE component called Citizen Data Vault, which enables users to autonomously manage consent at a fine-grained level.

## 3. Legal basis for the processing

ENG will process the information above detailed for the adequate performance of the contract with the user, for the purposes a), b), c) and d). Also, given ENG' s legitimate interest in providing and improving the functionalities of the DE Platform, for the purpose e). Legal basis for the processing done by third party applications (f) will be grounded on explicit consent.

## **5. The recipients of the personal data**

Personal data of the user will only be shared with persons authorized by ENG, for the above-mentioned purposes. Such persons will have an appropriate legal obligation of confidentiality (e.g. employees of ENG).

## **6. Transfer of personal data to a third country or international organisation**

ENG will not transfer personal data of the user to a third country or international organization.

## **7. Data retention**

The personal data processed for the purposes set out in section 2 will be stored for the time strictly necessary to achieve those same purposes, and only for experimentation time frame. The user has at any time the right to be forgotten, and can require the cancellation of the account and of the personal data linked to it.

Further information may be requested at the following address: [digitalenabler.dpo@eng.it](mailto:digitalenabler.dpo@eng.it)

## **8. Data subject rights**

By submitting a request to the Data Controller via an email to the following address: [digitalenabler.dpo@eng.it](mailto:digitalenabler.dpo@eng.it), the user has at any time the following rights:

- to object, to access, rectify or cancel (right to be forgotten) personal data;
- to withdraw consent and to request the limitation of processing (Art. 18 of the GDPR);
- to be informed about existence of processing;
- to obtain, in a structured, commonly used and machine-readable format the personal data provided and to have these data transmitted to another organization.

The user can also manage consents by accessing the Citizen Data Vault.

In any case, the user is always entitled to lodge a complaint to the Supervisory Authority (art. 77 of the GDPR)

## **9. Changes to this Privacy Policy**

This privacy policy is effective **from 20th May 2019**.

ENG reserves the right to modify this Privacy Policy at any time in accordance with this provision. If we make changes to this Privacy Policy, we will post the revised Privacy Policy on the DE platform and update the "Last Updated" date at the top of this Privacy Policy. We will also provide the user with notice of the modification by email before they become effective. If the user disagrees with the revised Privacy Policy, the user may cancel the Account. If the user does not cancel the Account before the date the revised Privacy Policy becomes effective, the user' s continued access to or use of the DE will be subject to the revised Privacy Policy.

## **DE - Cookie Policy**

### **What is a cookie?**

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

### **Key concepts**

First- and third-party cookies. Whether a cookie is first- or third-party refers to the domain placing the cookie. First-party cookies are those set by a website that is being visited by the user at the time. Third-party cookies: are cookies that are

set by a domain other than that of the website being visited by the user. If a user visits a website and another entity sets a cookie through that website this would be a third-party cookie. DE does not use third-party cookies

Persistent and session cookies. The persistent cookies remain on a user's device for the period of time specified in the cookie. They are activated each time the user visits the website that created that particular cookie. Session cookies: these cookies allow website operators to link the actions of a user during a browser session. A browser session starts when a user opens the browser window and finishes when they close the browser window. Session cookies are created temporarily. Once you close the browser, all session cookies are deleted.

### **How to delete and block our cookies**

You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site. Unless you have adjusted your browser setting so that it will refuse cookies, our system will issue cookies as soon as you visit our site.

### **Changing your cookie settings**

Please note that Internet browsers allow you to change your cookie settings. These settings are usually found in the "options" or "preferences" menu of your Internet browser. In order to understand these settings, the following links may be helpful. Otherwise you should use the "Help" option in your Internet browser for more details.

You can stop accepting the use of cookies at any time by deleting your cookies using your Internet browser settings. For further information about deleting or blocking cookies, please visit: <http://www.aboutcookies.org>

### **What cookies do we use and why?**

To find out about specific cookies we use on this site, please see below for details.

The cookies used on our site are categorised as follows:

- **Strictly necessary cookies**

Strictly necessary cookies let you move around the website and use essential features like maintaining your login to the website. Without these cookies, services you have asked for cannot be provided. Please note that these cookies do not gather any information about you that could be used for marketing or remembering where you have been on the Internet.

We use these strictly necessary cookies to enable you: a) to submit information via online forms such as registration forms, b) maintain your login to the website, c) enable you to filter content (e.g., by country or by topic).

Accepting these cookies is a condition of using the website, so if you prevent these cookies we cannot guarantee your use of our website or how the security on our website will perform during your visit.

- **Performance**

Performance cookies collect information about how you use our website, e.g. which pages you visit, and if you experience any errors. These cookies do not collect any information that could identify you and is only used to help us improve how our website works, understand what interests our members and measure how effective our content is. We use performance cookies to provide anonymous statistics on how our website is used.

By using our site, you accept the use of Performance cookies. Accepting these cookies is a condition of using the website, so if you prevent them we cannot guarantee how our site will perform for you.

- **Functionality**

Functionality cookies are used to provide services or to remember settings to improve your visit. These cookies are only placed on your hard drive if the related functionality is used.

We use functionality cookies to hide the cookie notice on subsequent visits.

**If you have questions or comments about this Privacy Statement or the use of "Cookies", or you believe that your rights to the protection of privacy were violated please contact us by email: [digitalenabler.dpo@eng.it](mailto:digitalenabler.dpo@eng.it)**