



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data

Processing operation: Privacy statement on the protection of personal data in relation to the “EU Defence Innovation Scheme (EUDIS) Business Accelerator website and IT Tools”.

Data Controller: European Commission, Directorate General for Defence Industry and Space – Unit A.3 for European Defence Fund Implementation – Defence Technologies and Innovation [“DG DEFIS Unit A.3” or the “Data Controller”], DEFIS-A3@ec.europa.eu

Record reference: DPR-EC-32730.1

Table of Contents

1. Introduction
2. Why and how do we process your personal data?
3. On what legal ground(s) do we process your personal data?
4. Which personal data do we collect and further process?
5. How long do we keep your personal data?
6. How do we protect and safeguard your personal data?
7. Who has access to your personal data and to whom is it disclosed?
8. What are your rights and how can you exercise them?
9. Contact information
10. Where to find more detailed information?

1. Introduction

The European Commission (hereafter ‘the Commission’) is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.

The information in relation to processing operation “EU Defence Innovation Scheme (EUDIS) Business Accelerator website and IT Tools” undertaken by the Data Controller is presented below.

2. Why and how do we process your personal data?

The Data Controller processes your personal data to establish and manage online community of registered data subjects within the framework of the EUDIS Business Accelerator to:

- Provide data subjects access to and use of the EUDIS Business Accelerator website: <https://eudis-business-accelerator.eu/> and to improve their experience on the website;
- Establish and manage online community of registered data subjects within the framework of EUDIS Business Accelerator;
- Register data subjects on the EUDIS Business Accelerator platform, hosted on SwapCard and assess their eligibility for accessing the platform and participating in related activities (bootcamps, online events, etc.);
- Enable data subjects to create and maintain personal and/or professional profiles to be hosted on the EUDIS Business Accelerator platform;
- Enable data subjects to participate as company, coach, trainer/guest speaker or field expert as part of EUDIS Business Accelerator activities; and
- Establish and manage a database of participants to the EUDIS Business Accelerator and check the participant's eligibility to participate into programme's activities.

The public IT website [<https://www.eudis-business-accelerator.eu/>] may contain personal data in the form of contact details and photos of events. This website may collect personal data via cookies based on consent. The (for the users) restricted EUDIS Business Accelerator IT Collaborative Platform hosted on SwapCard contains invitations to meetings, related minutes and follow-ups, common actions etc. Users access to the restricted collaborative platform via login identification, subject to the approval by the administrators (the data processors of the EUDIS Business Accelerator).

Your data will not be used for an automated decision-making, including profiling.

3. On what legal ground(s) do we process your personal data?

We process your personal data, because the processing operations on personal data, linked the management of the IT tool are necessary:

- For the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (Article 5(1)(a) of Regulation (EU) 2018/1725);
- Because you have given consent to the processing of your personal data for publication of contact details and photos, via a clear affirmative act by ticking relevant boxes on the online registration form. Your consent can be withdrawn at any time by writing to contact@eudis-business-accelerator.eu

Those provisions are in particular, Article 11 of the Treaty on European Union and Article 15 of the Treaty on the Functioning of the European Union. Consequently, those processing operations are lawful under Article 5(1)(a) of Regulation (EU) 2018/1725 (processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body).

In addition, we process your personal data based on your consent, which you have provided through a clear affirmative act by ticking the consent box on the online registration form in the restricted IT Collaborative Platform (Swapcard), or by acknowledging the consent while filling the application form to take part in the EUDIS Business Accelerator programme:

- For the public IT website [<https://www.eudis-business-accelerator.eu/>] you have consented to the processing of your personal data by agreeing to participate in the EUDIS Business Accelerator Programme.
- For the restricted IT Collaborative Platform (Swapcard), you have given consent by registering for EUDIS Business Accelerator and using the platform to access meeting invitations, minutes, follow-up actions, shared documents, industry news, insights, and contact details of entities from EU Member States and Norway.

Your consent can be withdrawn at any time by cancelling your registration in the IT Tool or by contacting the Data Controller. European Commission, DG DEFIS Unit A.3 at DEFIS-A3@ec.europa.eu

4. Which personal data do we collect and further process?

In order to carry out this processing operation, the Data Controller processes the following categories of personal data:

Personal data obtained from the data subject through the use of the EUDIS Business Accelerator website:

- IP address and/or Device ID of the device used to access the website;

Personal data obtained from the data subject through the use of the application form to apply as a Business Accelerator programme participant (as Company, Coach, Trainer/Guest Speaker or Field Expert):

- First name
- Last name
- Email Address
- Nationality
- Current affiliation (organisation, role/title)
Links to social media (LinkedIn profile) (optional)
- Any other personal data provided voluntarily and included in the application documents submitted by the data subject, such as CV.

Personal data obtained from the data subject through the use of the embedded website form for you to contact us:

- First name
- Last name
- Email address Phone number (optional)

We have obtained your personal data from you.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the abovementioned purposes. For each of the categories of personal data that is processed, please find below the retention details:

- Authentication data will be kept in the IT system for the duration of your participation in the group;
- Audio-visual recordings obtained from the data subject during recorded online activities will be kept for 8 months after the event before being deleted. More information is available in the Record of Processing DPR-EC-01937 (Audiovisual recording of meetings);

- The optional data mentioned above can be deleted at any moment upon your request, as it is not necessary for getting access to the platform itself.
- In case the group or the IT tool are permanently discontinued, all data will be pseudonymised and kept for a maximum of 5 years; and
- Selected service providers for organisational purposes (such as caterers, travel agents, or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process, and protect it from unauthorised access, use, and retention.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission or of its contractor (Starburst). All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' [Regulation \(EU\) 2016/679](#)).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

When necessary, we may also share your information with the following contractors part of the consortium or Programme you have applied to for the purposes of evaluation and processing of your application, sending you deadline reminders and other important information, inviting you to the programme or rejecting your application, if invited sending you onboarding information, information during the programme and information.

Data processors:

- Starburst Accelerator SAS (France) as the prime contractor of the consortium for EUDIS Business Accelerator and Matchmaking and collector of the personal data;

Sub-processors:

Civitta Eesti AS (Estonia) as a consortium member;

- WSL (Belgium) as a consortium member;
- Teknologian Tutkimuskeskus VTT OY (Finland) as a consortium member;

The above data processors may engage the following sub processors of your personal data:

- Swapcard Corporation SAS (France), as a sub-contractor, which provides the Matchmaking/Business Accelerator platform used as a central hub for news, insights, online activities; and
- Tally B.V. (Netherlands), as sub-contractor, which provides the online questionnaire platform for the application process
- Formagrid Inc. (USA – data storage in Frankfurt, Germany), as sub-contractor for storing the data during the application phase
- LOBAbx (Portugal), as a sub-contractor, who is the communication partner of the consortium.

The mandatory contact details and photos of events are published on the website. The photos, videos, and other audio-visual recordings of the events during the EUDIS Business Accelerator will be used for the promotion of the EUDIS Business Accelerator on the EUDIS Business Accelerator website (<https://www.eudis-business-accelerator.eu/>), DG DEFIS's and contractors' social media channels (Facebook, Instagram, LinkedIn, X and YouTube) and other websites of DG DEFIS, subject to the explicit consent of every participant (see Privacy statement for events).

In addition, your other personal data (email address, phone number, job title) will be published on the platform hosted by Swapcard to enable other members of the platform to contact you. Access to this site is limited to members of groups and observers primarily in EU Member States and Norway. Access is subject to approval of European Commission Services and is meant to cover EU defence stakeholders (start-ups and SMEs, investors, corporates and defence end-users).

Cookies

Cookies are short text files stored on a user's device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

Applying for the Business Accelerator platform takes place via Tally [www.tally.so], which employs cookies as described here: tally.so/help/cookie-policy.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Data Controller control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so by contacting us at contact@eudis-business-accelerator.eu

Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the EUDIS Business Accelerator through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

You can watch our videos, which we also upload to our social media page and follow links from our website to other relevant social media.

In order to protect your privacy, our use of third-party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users read the relevant privacy policies of X, LinkedIn, carefully before using them. These explain each company’s policy of personal data collection and further processing, their use of data, users’ rights and the ways in which users can protect their privacy when using those services.

The use of a third-party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

8. What are your rights and how can you exercise them?

You have specific rights as a ‘data subject’ under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation. You have consented to provide your personal data to the data controller European Commission, Directorate General for Defence Industry and Space – Unit A.3 for European Defence Fund Implementation – Defence Technologies and Innovation [“DG DEFIS Unit A.3” or the “Data Controller”], DEFIS-A3@ec.europa.eu. The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

9. Contact information

- The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, European Commission, Directorate General for Defence Industry and Space – Unit A.3 for European Defence Fund Implementation – Defence Technologies and Innovation [“DG DEFIS Unit A.3” or the “Data Controller”], DEFIS-A3@ec.europa.eu

- The Data Protection Officer (DPO) of the Commission

In case of disagreement with the Data Controller, you may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

- The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu or https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission DPO publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO’s public register with the following record reference: DPR-EC-32730.1