

PRIVACY POLICY

The protection of your personal data on the occasion of your visit to our website is an important concern for us.

Definitions

For the purposes of this Privacy Policy:

- **“Project”** (referred to as either "the Project", "We", "Us" or "Our" in this Agreement) refers to COMPLEMENTS - Cross-sectoral Skills Strategy for Security and Defence, the project 101259993 – ERASMUS-EDU-2025-PI-FORWARD (FORWARD-LOOKING PROJECTS) funded by European Education and Culture Executive Agency (EACEA)
- **“Cookies”** are small files that are placed on your computer, mobile device or any other device by a website, containing the details of your browsing history on that website among its many uses.
- **“Personal Data”** is any information that relates to an identified or identifiable individual.
- **“Service Provider”** means any natural or legal person who processes the data on behalf of the Project. It refers to third-party companies or individuals employed by the Project to facilitate the Service, to provide the Service on behalf of the Project, to perform services related to the Service or to assist the Project in analysing how the Service is used.
- **“Website”** refers to the COMPLEMENTS website, accessible from <https://complements-project.eu>
- **“You”** means the individual accessing or using the website, or the company, or other legal entity on behalf of which such individual is accessing or using the website, as applicable.

This Privacy Policy describes how COMPLEMENTS collects and uses your personal data. Furthermore, it provides information about your privacy rights and how the law protects you.

This information notice addresses the following points:

1. Cookies

2. Personal data processed
3. Purposes and legal bases of our processing of personal data
4. Disclosure of your personal data to third parties
5. Protection of your personal data
6. Duration of retention of your personal data
7. Your rights
8. Changes to this Privacy Policy
9. Data Controller
10. Contact us

1. Cookies

This website uses primary temporary cookies that are essential to its performance.

2. Personal data processed

2.1. We collect your data as a result of your sharing of your data with us. This may, for instance, be information that you enter into our contact form or in our newsletter subscription form.

2.2. Google Analytics

We use Google Analytics as a service provider to understand how visitors engage with the website. Google Analytics allows us to count visitors and their origin, so that we can analyse and improve the site's performance. They help identify the most and least visited pages and how visitors move around the site. All information collected is aggregated and therefore anonymized. If you don't want Google Analytics to be used in your browser, you can install the '[Google Analytics Opt-Out Browser Add-On](#)' provided by Google.

3. Purposes and legal bases of our processing of personal data

3.1. We may totally or partially store and process your personal data in the following ways and for the following purposes:

- newsletters
- report website traffic and corresponding analysis to the European Commission, namely the European Education and Culture Executive Agency (EACEA)

3.2. When we use personal data for the above purposes, we ensure that this use is in accordance with a recognised legal basis. We can thus justify the aforementioned processing operations by one of the following legal bases:

- We must honour our contractual commitments and/or implement our contractual rights;
- We have obtained your consent;
- We must fulfil legal and regulatory obligations;
- This may be necessary to establish, exercise or defend our legal rights, or to bring legal action;

- The use of your personal data, as described above, is necessary for our legitimate interests, which include:
 - Allow us to manage and administer the operation of our organisation effectively and efficiently;
 - Carry out scientific studies or analyses;
 - Maintain compliance with internal policies and procedures.

4. Disclosure of your personal data to third parties

4.1. We may totally or partially share your personal data within the Project for the purposes described above. We will take steps to ensure that access to personal data is restricted to employees of the COMPLEMENTS partners who have an interest for the purposes described in this agreement.

4.2. We may also totally or partially share your personal data outside the Project for the following purposes:

- To the European Commission, namely the European Education and Culture Executive Agency (EACEA), in reports about the Project.
- To the extent required by law, for example if we are under a duty to disclose your personal data in order to comply with any legal obligation (including, without limitation, compliance with tax requirements, notifications to regulatory authorities and transparency obligations), or to establish, exercise or defend our legal rights.

5. Protection of your personal data

5.1. COMPLEMENTS takes appropriate technical and organisational measures to protect your personal data. We have extensive controls in place to ensure the security of our information and information systems. The information we process is protected by safeguards appropriate to the sensitivity of the information in question. Adequate controls (such as restricted access) are integrated into our IT systems. Physical access to areas where personal data is collected, processed or collected is limited to authorised employees.

5.2. As part of their conditions of employment, the Project Partners' employees are required to comply with all applicable laws and regulations, including those relating to the right to the protection of personal data. Access to sensitive personal data is limited to employees who

need it to perform their duties. Unauthorised use and disclosure of confidential information by the above-mentioned employees is prohibited and may result in disciplinary action.

6. Duration of retention of your personal data

The retention period of your personal data will vary and will be determined by the following criteria:

- The purposes for which we use your personal data. COMPLEMENTS will not retain your personal data for longer than is necessary for these purposes;
- Our legal obligations. It is possible that a law or regulation sets a minimum period for which we must retain your personal data.

7. Your rights

You have the right to receive information about the source, recipients, and purposes of your archived personal data at any time. You also have the right to demand that your data are rectified or eradicated. If you have consented to data processing, you have the option to revoke this consent at any time, which shall affect all future data processing. Moreover, you have the right to demand that the processing of your data be restricted under certain circumstances. Furthermore, you have the right to log a complaint with the competent supervising agency.

You can exercise your rights by contacting us using the contact information provided in section 10 below. Please do not hesitate to contact us at any time if you have questions about this or any other data protection related issues.

8. Changes to this Privacy Policy

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our website, prior to the change becoming effective and update the "Last updated" date at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

9. Data controller

Eupportunity - European Affairs Consultancy is the COMPLEMENTS partner co-responsible for Work Package Dissemination, Exploitation and Impact collecting certain data to personal nature concerning you. As data controller, *Eupportunity - European Affairs Consultancy* is responsible for the use of this personal data in accordance with data protection laws, including, but not limited to, the General Data Protection Regulation (GDPR).

10. Contact

For any questions or uncertainties regarding the processing of your personal data by COMPLEMENTS, or about this agreement, or in order to exercise the rights mentioned above, please contact the project's coordinators' Data Protection Supervisor eupportunity@eupportunity.eu.