This Privacy Policy applies to ITHACA project and governs personal data collection and use. ITHACA project is committed to being transparent and to ensuring your privacy is protected. By using our website, you consent to personal data practices described below. We reserve the right to update or change the policy at any time, therefore you may want to review it periodically

**1. Who we are:**

ITHACA is a project funded by the European Union’s Framework Programme for Research and Innovation Horizon Europe. The ITHACA project is a ground-breaking initiative aimed at improving our understanding of the complexities and controversies surrounding the integration of AI in the field of civic participation. The project aims to promote responsible practices of research and innovation that align AI technologies with human rights, values, and ethical principles. The ultimate goal of ITHACA is to maximize the positive impact of AI on democratic institutions and processes by developing and testing an online discussion platform that incorporates human and social perspectives into the design process.

The platform will be designed to be human-centric and transparent, and will pay special attention to the needs of vulnerable groups. Through pilot activities in two EU countries (Romania and Slovakia), ITHACA will assess the potential of AI to enhance citizens' participation in local governance while minimizing adverse effects and empowering citizens with knowledge about the AI models involved. The project will also provide scalable tools for identifying security risks and ensuring conformity with principles of fairness and privacy in AI-based systems.

Based on its implementation experiences, ITHACA will provide a data governance framework with ethical principles and practices for AI civic engagement platforms, as well as policy recommendations for embedding philosophical, legal, and ethical values in the development of such platforms. If you're looking to stay informed about the latest developments in AI and civic participation, be sure to follow the ITHACA project on social media.

**The partners of the ITHACA consortium, listed below, process certain types of personal data for the purposes of the project. Each partner is responsible for the personal data they collect and process during their activities under the framework of the project:**

* KONNEKT ABLE TECHNOLOGIES LIMITED
* ETHNIKO KENTRO EREVNAS KAI TECHNOLOGIKIS ANAPTYXIS
* PANEPISTIMIO PATRON
* RAISING THE FLOOR
* STAMADIANOS KAI SYNETAIROI DIKIGORIKI ETAIREIA
* UNIVERSITAET GRAZ
* MNLT INNOVATIONS IKE
* SOFTWARE IMAGINATION & VISION SRL
* PEDAL CONSULTING SRO
* AGENTIA METROPOLITANA PENTRU DEZVOLTARE DURABILA BRASOV ASOCIATIA
* MESTO MARTINFor further information, we can be contacted at: [info@ITHACA-project.eu](mailto:info@robin-project.eu)

**2. How we collect your personal data**

We collect personal data both directly and indirectly:

**Directly.** We obtain personal data directly from individuals in a variety of ways, including but not limited to the following cases:

* an individual subscribes to our newsletter/s;
* an individual registers to attend meetings and events we host and during attendance at such events;
* we establish cooperative relationships with an individual;
* we provide professional services pursuant to our contract with the European Commission;
* an individual participates in an interview or survey organized by us.

**Indirectly.** We obtain personal data indirectly about individuals from a variety of sources, including:

* our research partners;
* our networks and contacts;
* public and open data sources such as public registers, news articles and internet searches;
* social and professional networking sites (e.g., LinkedIn).

**3. What types of data we collect?**

We only collect the data that are necessary for the smooth implementation of our project. These data fall into the following categories:

* contact details (name/ surname, e-mail address, street address, mobile phone number, land line phone number);
* professional information (job title, organization, field of expertise);
* demographics (e.g., age, gender, nationality);
* information about what a person knows or believes.
* videos and photos (from people that attend our events).

**4. Bases of lawful processing**

We process personal data on the following legal bases:

Legal obligations – for processing activities required for compliance both with applicable national and European legislation as well as with the specific legal and regulatory framework of the Horizon Europe Framework Programme for Research and Innovation of the European Union.

Consent – for processing activities such as organization of surveys and interviews, completing of questionnaires and dissemination of project’s results.

Contractual obligations – for processing activities such as reporting to the European Commission and complying with project’s publicity obligations.

**5. What we do with your personal data**

We process your personal data with the purpose of:

* Conducting research (e.g., interviews, surveys);
* Dissemination our project’s results to different types of stakeholder;
* Sending invitations and providing access to guests attending our events and webinars;
* Administering, maintaining, and ensuring the security of our information systems, applications, and websites;
* Processing online requests or queries, including responding to communications from individuals;
* Complying with contractual, legal, and regulatory obligations.

**6. How we secure your personal data when we process it**

We continuously apply a personal data risk assessment process to identify, analyse, and evaluate the security risks that may threat your personal data. Based on the results of this risk assessment, we define and apply a set of both technical and organizational measures to mitigate the above security risks, including but not limited to:

* Data Protection Policies to guide our personnel when processing your data;
* Written contracts with organizations that process personal data on our behalf;
* Non-Disclosure Agreements with our personnel;
* Back up process, antimalware protection, access control mechanisms, etc.
* Some of our partners have appointed a Data Protection Officer.

**7. Do we share personal data with third parties?**

We may occasionally share personal data with trusted third parties to help us deliver efficient and quality services. When we do so, we ensure that recipients are contractually bound to safeguard the data we entrust to them before we share the data. We may engage with several or all the following categories of recipients:

* Parties that support us as we provide our services (e.g., cloud-based software services such as Dropbox, Microsoft SharePoint, Google);
* Our professional advisers, including lawyers, auditors, and insurers;
* Dissemination services providers (e.g., MailChimp);
* Law enforcement or other government and regulatory agencies or other third parties as required by, and in accordance with applicable law or regulation;
* The European Commission according to our relevant contractual obligations.

**8. Do we transfer your personal data outside the European Economic Area?**

We do not own file servers located outside the European Economic Area (EEA). However, some partners may use cloud and / or marketing services from reputable providers such as SharePoint, DropBox, MailChimp, Google, etc., situated both inside and outside the EEA. We always check that such providers comply with the relevant GDPR requirements before start using their services.

**9. Do we use cookies?**

Our websites use cookies. Where cookies are used, a statement will be sent to your browser explaining the use of cookies.

Cookies are small text files which are saved on your computer, mobile phone or tablet. They allow the website to remember your actions and preferences (such as login, language, font size and other display preferences) so you don’t have to keep re-entering them whenever you come back to the site. You can control and/ or delete cookies as you wish. If you do this, however, you may need to manually adjust your preferences every time you visit a site. For more information on how to manage cookies, please visit: [*http://www.aboutcookies.org/*](http://www.aboutcookies.org/)

We use tools like Google Analytics to better understand how visitors interact with our website. This provides us with important information to enable the site to work better. The information collected is not linked to your personal data. For more information on the cookies set by Google Analytics, please visit: [*http://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html*](https://code.google.com/apis/analytics/docs/concepts/gaConceptsCookies.html)

The following cookies are necessary and are always enabled:

|  |  |  |
| --- | --- | --- |
| **Name** | **Typical content** | **Cookie expires after** |
| \_\_cf\_bm | The cookie is set by cloudflare. This cookie is used to distinguish between humans and bots. This is beneficial for the website, in order to make valid reports on the use of their website. | 30 minutes |
| cookielawinfo-checkbox-analytics | This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category “Analytics”. | 11 months |
| cookielawinfo-checkbox-functional | The cookie is set by GDPR cookie consent to record the user consent for the cookies in the category “Functional”. | 11 months |
| cookielawinfo-checkbox-necessary | This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category “Necessary”. | 11 months |
| CookieLawInfoConsent | This cookie is set by GDPR Cookie Consent plugin. The cookie records the default button state of the corresponding category along with the status of CCPA. | 11 months |
| viewed\_cookie\_policy | The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data. | 11 months |

The following cookies are functional and are always enabled:

|  |  |  |
| --- | --- | --- |
| **Name** | **Typical content** | **Cookie expires after** |
| wordpress\_sec\_COOKIEHASH | This cookie is set by wordpress. The cookie is set to provide protection against hackers, store account details. | session |

The following cookies are for analytics and are optional:

|  |  |  |
| --- | --- | --- |
| **Name** | **Typical content** | **Cookie expires after** |
| \_ga\_\* | This cookie is set by Google Analytics. This cookie is used to store and count pageviews. | 2 years |
| \_gat | Used to throttle request rate | 1 minute |
| \_ga | This cookie is set by Google Analytics. This cookie is used to distinguish users. | 2 years |

**10. Your rights**

You have the following rights regarding our processing of your personal data:

* **Right to withdraw consent** – You can withdraw consent that you have previously given to one or more specified purposes to process your personal data. This will not affect the lawfulness of any processing carried out before you withdraw your consent.
* **Right of access** – You can ask us to verify whether we are processing personal data about you and, if so, to have access to a copy of such data.
* **Right to rectification and erasure** – You can ask us to correct our records if you believe they contain incorrect or incomplete information about you or ask us to erase your personal data after you withdraw your consent to processing or when we no longer need it for the purpose it was originally collected.
* **Right to restriction of processing** – You can ask us to temporarily restrict our processing of your personal data if you contest the accuracy of your personal data, prefer to restrict its use rather than having us erase it, or need us to preserve it for you to establish, exercise or defend a legal claim. A temporary restriction may apply while verifying whether we have overriding legitimate grounds to process it. You can ask us to inform you before we lift that temporary processing restriction.
* **Right to data portability** – In some circumstances, where you have provided personal data to us, you can ask us to transmit that personal data (in a structured, commonly used, and machine-readable format) directly to another entity.
* **Right to object –** You can object to our use of your personal data for direct marketing purposes, including profiling or where processing has taken the form of automated decision-making. However, we may need to keep some minimal information (e.g., e-mail address) to comply with your request to cease marketing to you.
* **Right to make a complaint to your local Data Protection Authority** (DPA) (see [*https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\_en.htm*](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)) regarding any concerns you may have about our data handling practices.

To ask us to do anything of the above, you can contact us by email: [*info@ITHACA-project.eu*](mailto:info@robin-project.eu). We will promptly examine your request against the relevant requirements of the laws and regulations governing privacy and personal data protection and we will answer the latest within 30 days after receiving your request. We will ask from you some kind of identification (e.g., photocopy of your identity card or passport) to avoid non-authorized reveal of your personal data. If, for reasons of complexity of the request or a multitude of requests, we are unable to respond promptly, we will notify you within 30 days of any delay, which in no case may exceed two months from the expiration of the 30-day deadline.

**11. How long do we retain personal data?**

We retain personal data to provide our services, stay in contact with you and to comply with applicable laws, regulations, and contractual obligations to which we are subject. Please note that we have an obligation to retain data concerning projects funded by the Horizon Europe Framework Programme for Research and Innovation of the European Union for up to five years after the end of the project (unless further retention is requested by auditors). After the expiry of the retention period, and unless further legitimate grounds for retention arise, we will dispose of personal data in a secure manner.

**12. Disclaimer of liability for third party websites**

Although our site may contain links to third-party sites, including the sites of the consortium partners, we are not responsible for the privacy practices or content of these sites and we expressly disclaim any liability for any loss or damage that may be caused by the use of these links. We do not monitor the privacy practices or the content of these sites. If you have any questions about the privacy practices of another site, you should contact the site’s responsible personnel. We suggest you read the privacy policy of each website you interact with, before allowing the collection and use of your personal data.

We may also provide social media features that allow you to share information on your social networks and interact with our project on various social media sites. The use of these social media features may result in the collection or sharing of information about you. We recommend that you check the privacy policies and regulations of the social networking sites you interact with, so that you can be sure that you understand what information may be collected, used and disclosed by these site.

**13. Children**

We do not knowingly collect, use, or disclose information from children under the age of 16. If we learn that we have collected the personal information of a child under 16, we will take steps to delete the information as soon as possible. Please immediately contact us if you become aware that a child under 16 has provided us with personal information.

**14. Revisions of this Privacy Policy**

This Privacy Policy is valid from 19/12/22 and replaces any other previous notifications that we had issued in the past regarding our personal data management practices. We reserve the right to revise this Policy at any time. The current version will be always uploaded to our website indicating the date of entry into force, so you know when the most recent revision took place. If there are critical changes in this policy or our personal data practices change significantly in the future, we will notify you by posting the changes on our website.