



*Updated 23 February 2024*

## **CBRA Data Protection and Privacy Policy**

This data protection and privacy policy ("policy") defines the main principles, responsibilities and procedures that will be followed when personal and other sensitive data are processed at **Cross-border Research Association (CBRA)** ("us", "we", "our"). It will help you understand how we use and protect the data that we collect within our projects, or you provide to us when you visit and use [www.cross-border.org](http://www.cross-border.org)

### **Why is this policy necessary?**

**CBRA** is a center for knowledge and research where information is constantly being processed. Some of this information is related to living people and is thus personal data. We may also process other sensitive data in our projects. The purpose of this policy is to define the main principles, responsibilities and procedures that will be followed when personal or other sensitive data are processed. In addition, to further ensure the protection of data, there are other instructions in place in each project. With this policy we want to ensure our compliance to the demands set by the EU General Data Protection Regulation (GDPR) and other relevant legislation.

### **Who are responsible for following the policy?**

The CBRA management carries the overall responsibility for data protection, privacy and security. The management is responsible for this policy and its implementation, and the organization and resourcing of the necessary activities. The policy also governs those activities managed and carried out by the CBRA community members in the projects in which CBRA has a formal role. If the processing of data is done on behalf of CBRA, this policy must be observed regardless of where the data are being stored and who owns the equipment used in the processing activities.

All members of the CBRA community – independent of their contractual relationship with CBRA - are required to observe this policy. Every CBRA member who processes personal data must ensure that, where any data processed by them is concerned, the personal and other sensitive data are stored securely and not given to third parties by accident or on purpose in an unlawful manner. Integrity, confidentiality and usability will be strived towards with both technological and procedural means.

### **What do we do within this policy?**

We ensure that all personal and sensitive data remain safe and secure. Data protection means assuring the privacy and trust of an individual (data subject) and protecting personal data against unauthorized processing. Processing means, for instance, collection, recording, organizing,

structuring, storage, adaptation, alteration, retrieval, combination, as well as transmission and destruction of data. The processing of personal data must always be done for a specified purpose and on a lawful (specified by GDPR Article 6) basis.

Information security means the technical and organizational measures taken to protect information, services, systems and communications. CBRA is committed to securing your data and keeping it confidential. We do all in our power to prevent data theft, unauthorized access, and disclosure by implementing the latest technologies and software, which help us safeguard all the information we collect either online or otherwise.

Personal data means any information concerning an identified or identifiable natural person. Personal data is, or can be, for instance, a person's name, address, social security number, location data, IP address, other network identification, photograph, dietary information, medical information or other information that, either by itself or when combined with other information, forms knowledge about a specific person. Such data may be collected in relation to our projects or other activities, such as using the CBRA website.

### **How do we work in our projects?**

For data processing related to our projects, the aims of the research will be taken into account whilst observing the principles set out in this policy. Data protection and information security requirements shall be taken into account in the project plan and in the data management plan. The data subjects are informed of the most central aspects of processing in a clear and understandable manner and personal data processing information required by legislation is given to the data subjects. Researchers are responsible for informing data subjects.

People who process personal data in a project will follow this policy. All project members must process personal data according to the best practices of the field in accordance to the European Code of Conduct for Research Integrity ([The European Code of Conduct for Research Integrity - ALLEA](#)). The processing of personal data will be limited to the minimal amount required to achieve the goals of the project. In addition, data must be pseudonymized or anonymized whenever necessary.

### **How do we work with our website?**

When you visit the CBRA website, we may collect the following data:

- Your IP address.
- Your contact information and email address.
- Other information such as interests and preferences.
- Data profile regarding your online behavior on our website.

We are collecting your data for several reasons:

- To better understand your needs.
- To improve our services and products.
- To send you promotional emails containing the information we think you will find interesting.

- To contact you to fill out surveys and participate in other types of market research.
- To customize our website according to your online behavior and personal preferences.

When you access our website, we will ask permission to use cookies. Once you agree to allow our website to use cookies, you also agree to use the data it collects regarding your online behavior (analyze web traffic, web pages you visit and spend the most time on). The data we collect by using cookies is used to customize our website to your needs. After we use the data for statistical analysis, the data is completely removed from our systems.

Please note that cookies don't allow us to gain control of your computer in any way. They are strictly used to monitor which pages you find useful and which you do not so that we can provide a better experience for you. If you want to disable cookies, you can do it by accessing the settings of your internet browser. You can visit <https://www.internetcookies.com>, which contains comprehensive information on how to do this on a wide variety of browsers and devices.

Our website contains links that lead to other websites. Visiting those websites is not governed by this policy, and CBRA is not held responsible for your data and privacy protection.

At some point, you might wish to restrict the use and collection of your personal data. You can achieve this by doing the following:

- When you are filling the forms on the website, make sure to check if there is a box which you can leave unchecked, if you don't want to disclose your personal information.
- If you have already agreed to share your information with us, feel free to contact us via email and we will be more than happy to change this for you.

CBRA will not lease, sell or distribute your personal information to any third parties, unless we have your permission. We might do so if the law forces us. Your personal information will be used when we need to send you promotional materials if you agree to this policy.

We reserve the right to change this policy at any given time as necessary. The up-to-date will always be available at our website.

### **Do you have any questions or comments?**

Please send an email to: [cbra@cross-border.org](mailto:cbra@cross-border.org)