

## **PRIVACY POLICY**

INESC Microssistemas e Nanotecnologias – Instituto de Engenharia de Sistemas e Computadores para os Microssistemas e Nanotecnologias (INESC MN) is a private non-profit association, declared a public utility, active in the areas of scientific research, development and technology transfer and training of students, post-docs and scientists.

INESC MN is committed to protecting the privacy of data subjects in full compliance with the current data protection legislation, in particular Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April of 2016 ("RGPD"). Therefore, considering the importance of transparency in processing the data of its Employees, Partners and other interested parties, INESC MN has outlined a Personal Data Privacy Policy that covers how information of a personal nature is collected, used, disclosed, transferred and stored, it is imperative to make known the general rules of data processing strictly respecting and complying with the provisions in the current legislation.

## **PERSONAL DATA AND ITS TREATMENT**

"Personal data" means information relating to an identified or identifiable natural person ("data subject"); an identifiable person is considered to be identifiable, directly or indirectly, in particular by reference to an identifier, such as a name, an identification number, location data, electronic identifiers or to one or more specific elements of their physical, physiological, genetic, mental, economic, cultural or social identity (Article 4 of the RGPD).

As part of its activity, INESC MN processes personal data resulting from its relationship with the following groups of persons: employees (contractors, fellows, researchers, trainees and service providers); students, trainees and trainers; contact persons and legal representatives of customers and suppliers; beneficial owners of suppliers; partners in research projects; visitors of the institutional site; and other interested parties.

The collection and processing of personal data is done through the execution of contractual Documents (e.g. processing of personal data in the context of Human Resources management activities such as recruitment and/or admissions, or personal data of customers' and suppliers' contact persons), in order to comply with legal obligations arising from the activity of INESC MN (e.g. processing of personal data in the context of Human Resources management activities such as processing of wages; tax and financial management; management of public procurement processes; beneficial owner data processing in the context of co-funded projects), the pursuit of their legitimate interests (e.g. employees' attendance management; financial and administrative management of national and European projects; processing of user logs in order to monitor the use of INESC

MN internet website) or, also, with the free and express consent of the holders of the data, where applicable.

Depending on the different purposes, the following categories of data are treated by INESC MN: general identification data (name, telephone contact, e-mail address, address, tax identification number, social security identification number, citizen's card number or identity card and validity), bank identification data (bank identification number / IBAN) and professional qualification data (curricular data provided in the curricula vitae available).

In addition, INESC MN - as a training entity or as a partner entity of public and private institutions - will receive personal data from trainees and trainers in the execution of training programs.

Additionally, in the context of research projects, personal data of project participants can be processed to the extent necessary for fulfilling the purposes of this research. In this case, the data subjects are always previously informed about the processing intended. Whenever feasible, the personal data generated by the activity of scientific research and technological development will be subject to anonymous treatment.

In the scope of visits to the institutional site of INESC MN and for the purpose of promotional information or the sending of newsletters, general contact data are processed. Also, cookies are used to improve user experience, website's security and gather data that allow to understand how users interact with it.

The processing of personal data is done through automatic and manual processes, with the appropriate technological and organizational measures and controls, adequate to their protection and preservation. These measures include the management of authentication and access to systems and installations, the management of user profiles of systems, controlled access to restricted information in any medium, the celebration of confidentiality commitments and professional secrecy with the employees and third parties and the use of more robust techniques such as encryption, when necessary.

In general, personal data are stored for as long as the link with INESC MN lasts for the period necessary to comply with legal obligations or in the pursuit of legitimate interests.

In the context of processing of data included in the form available on the website as well as processing of data gathered by cookies, personal data may be transferred to third parties outside the European Economic Area.

In certain situations, in respect of funded projects, personal data can be shared with third parties, namely with entities entrusted by law with specific tasks. In this context, personal data can be shared with European Commission as well as other union, national or other institutions with the purpose of assessment of satisfactory compliance with milestones and targets, as well as of control over the legality and regularity of payments and identification of risks of fraud, conflicts of interest or other irregularities, as required by applicable legislation in force (especially by the Regulation (EU) 2024/2509 and the Regulation (EU) 2021/241).

INESC MN undertakes to comply with the provisions of the RGPD as applicable to the transfer of data in question. Response to requests for access, obtaining, consulting, updating, alteration or delivery of personal data will be ensured, and the removal, restriction and opposition to the processing and termination of automatic processing of personal data for profile management may be requested, where requested, in accordance with the current legislation.

In cases where consent has been given, it can be withdrawn at any time using the contacts below.

The owners of the personal data can complain about the respective treatment, with the National Control Authority.

#### **DATA PROTECTION OFFICER**

The Data Protection Officer plays an important role in the protection of personal data, ensuring, among other aspects, the compliance of the processes with the current legislation, as well as verifying compliance with the current Personal Data Privacy Policy and defining clear rules of personal data processing, ensuring that all interested parties are aware of how INESC MN treats such data and what rights they have in this regard.

The Data Protection Officer is also responsible for contact between INESC MN and the National Control Authority, as well as between INESC and third parties in matters relating to the processing of personal data.

For this purpose, if the holder of the personal data needs to contact the data controller of INESC MN, he may do so through written communication addressed to the Data Processing Officer (INESC MN) at: Rua Alves Redol, no. 9, 1000-029 Lisboa or by e-mail to [rgpd@inesc-mn.pt](mailto:rgpd@inesc-mn.pt)