

# diFUME Privacy Policy

diFUME is a research project funded by the European Union's Horizon 2020 research and innovation programme under the Marie Skłodowska-Curie Individual Fellowships grant (H2020-MSCA-IF-2018, grant agreement No 836443). This privacy policy describes how the diFUME project uses and protects any information that is collected or provided when you use diFUME website.

## Data Controller

The personal data controller for the purpose of the operation of this website is as follows:

University of Basel  
Administration  
Petersgraben 35, Postfach  
4001 Basel  
Switzerland

The following terms provide important information relating to the type, the purpose of use of your personal data, their protection, as well as your rights as subjects of these data. For any further explanation, you may contact the Data Protection Officer (DPO) of University of Basel by sending an e-mail at [danielle.kaufmann@unibas.ch](mailto:danielle.kaufmann@unibas.ch)

## Types of Data Collected by the diFUME website

During your visit to diFUME website, you are not obliged to provide any personal information. We only ask you to provide limited personal details when you want to contact us (Name, e-mail address), by filling out the online contact form available on our website. diFUME website offers also a subscription option for receiving the periodic diFUME e-newsletter (see the relevant section below). The personal details that are collected are used exclusively for communication purposes and shall be strictly confidential.

The IP address of your computer (anonymized) and your approximate location (region, city) may also be automatically collected when visiting the website and using the contact form. For more information, please check the relevant cookies policy below or the Terms of Use.

diFUME has pages on social media (i.e. Twitter, LinkedIn, ResearchGate) but no data processing is carried out on such web pages by diFUME. diFUME does not exercise and cannot exercise influence and control over the nature and extent of the personal data collected and kept by the social media as a condition or result of their use and may not be held liable for any collection and processing of personal data by them. For more information about the purpose of collection and the further processing and use of personal data by social media platforms, as well as about the rights and available arrangements for protecting your privacy and personal data, please check the personal data protection policy of the relevant social media.

## Purpose and Principles of Personal Data Collection

diFUME project pays special attention to the protection of the visitors' and users' privacy and personal data in accordance to the relevant legislation. Personal data collection is limited to what is strictly necessary in accordance with the principle of data minimisation. The handling of such personal data is in accordance with Art. 9 of the Canton of Basel-Stadt's Information and Data Privacy Act (IDPA), the Swiss Federal Data Protection Act (DPA) (where applicable) and the corresponding regulations of the University of Basel. To the extent that the European Union's General Data Protection Regulation (GDPR, 2016/679/EU) applies, the personal data are processed on the basis of legal obligations (Art. 6(1)(c) GDPR) and of the subscriber's consent (Art. 6(1)(a) GDPR).

## Use of the Personal Data Collected by diFUME

The personal data we collect from the contact and subscription forms available on our website, as well as any other data that may be sent to us through our profiles on the various social networks, shall be used only for the needs of our communication with you and for your better service. While navigating on our website, cookies are used only for the purpose of statistical analysis of the visits to our website. No further processing, transmission or exchange of these data shall take place. In any event, you are a priori requested to consent to the above use of your personal data. For more information, please check the relevant cookies policy below.

## diFUME Newsletter Subscription

diFUME website uses Mailchimp<sup>1</sup> to collect the e-newsletter subscriptions and send the e-newsletters. diFUME website directs you to a Mailchimp landing page, therefore, the personal data provided are also handled under Mailchimp's privacy practices<sup>2</sup>. The following details are asked when subscribing:

- Full name
- E-mail address
- Organization
- Country

The double opt-in process is used, which includes an extra confirmation step in the form of confirmation email that verifies each email address<sup>3</sup>. A reCAPTCHA box is used for safety reasons and to prevent spam registrations<sup>4</sup>. diFUME does not exercise and cannot exercise influence and control over the nature and extent of the personal data collected and kept by the Mailchimp as a condition or result of its use and may not be held liable for any collection and processing of personal data by it. The visitors can be informed before subscribing about the privacy policy of Mailchimp<sup>2</sup> by visiting the respective link in the subscription form. It is highlighted in the subscription form that the subscribers acknowledge that their information are transferred to Mailchimp for processing. The mailing list subscriber have the right to unsubscribe from it via a link in the e-newsletter email at any time.

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<sup>1</sup> <https://mailchimp.com/>

<sup>2</sup> <https://mailchimp.com/legal/privacy/>

<sup>3</sup> <https://mailchimp.com/help/about-double-opt-in/>

<sup>4</sup> <https://mailchimp.com/help/about-recaptcha-for-signup-forms/>

## Cookies Policy

During users' navigation on diFUME website, identification data of users may be collected. Cookies are small text segments that are sent to the browser by a website visited by the user. Cookies are collected for security reasons, while they also help the website to remember information about the user's visit, to make secure searches and to calculate the number of visitors. The following access data may be collected:

- IP address (anonymised)
- Location: country, region, city, approximate latitude and longitude (Geolocation)
- Date and time of the request (visit to the site)
- Title of the page being viewed (Page Title)
- URL of the page being viewed (Page URL)
- URL of the page that was viewed prior to the current page (Referrer URL)
- Screen resolution of user's device
- Monitor what type of links are tracked (downloads, outgoing and mail-to)
- Pages generation time (the time it takes for webpages to be generated by the webserver and then downloaded by the visitor: Page speed)
- Main language of the browser being used (Accept-Language header)
- Browser version, browser plugins (PDF, Flash, Java, ...) operating system version, device identifier (User-Agent header)
- Language of the visited page
- Site Search
- Events

The web analysis tool "Matomo" (formerly called "Piwik") is integrated in the diFUME website for monitoring dissemination performance indicators. Matomo is compliant with EU data protection laws and is also used for monitoring and evaluating the effectiveness and efficiency of the <https://europa.eu/> website<sup>5</sup>. It ensures end-user data protection thanks to features such as source data anonymization and opt-out mechanisms for users. diFUME website has enabled the Matomo "Do Not Track" support and when users have set their web browser to "I do not want to be tracked" (DoNotTrack is enabled) then Matomo will not track these visits. Moreover, diFUME website has enabled the anonymization of the visitors IP, meaning that when users visit the website, Matomo will not use the full IP address (such as 213.34.51.91) but instead Matomo will anonymize it first (to 213.34.0.0). The Matomo web analytics platform is used to store cookies that expire after 13 months. The collected data contain no personal information and cannot be used to identify specific visitors. They will not be shared with any other organisation for marketing or commercial purposes.

**Your right to opt-out:** You may deactivate tracking if you wish, by following "Deactivate tracking" link located at the footer of the diFUME webpage and then unchecking the opt-out box. If you choose to opt-out, a cookie 'piwik\_ignore' will be set. All visitors with a piwik\_ignore cookie will not be tracked.

**How to control cookies:** You may control and/or delete cookies as you wish. You may find more details at [www.aboutcookies.org](http://www.aboutcookies.org). You may delete all cookies from your computer and, in most browsers, select settings that do not allow installation of cookies. However, in that case, you may have to adjust certain preferences every time you visit a website. Users may use diFUME website without problems even without the use of cookies, but preventing the owner from learning from your actions and creating a better experience for you and other users.

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<sup>5</sup> <https://matomo.org/gdpr/>

## Your Rights Relating to the Processing of Your Data

In accordance with the provisions of the Canton of Basel-Stadt's Information and Data Privacy Act (IDPA) and the EU General Data Protection Regulation (679/2016/EU), you have the right, both during the collection and afterwards, to be informed at no charge about any processing of your personal data, its purpose, as well as the storage and disclosure/transmission to third parties and their identity (right of information and access). You have also the right to request that your personal data kept by diFUME be corrected, updated or deleted and the right to have the processing restricted and the right to object. You have also the right to the revocation of any consent that has been granted and to object to the processing of your personal data.

In order to receive information and exercise your rights, you may contact the Data Protection Officer (DPO) of University of Basel by sending an e-mail at [danielle.kaufmann@unibas.ch](mailto:danielle.kaufmann@unibas.ch)

We point out that, in accordance with the Regulation, you have the right to file a complaint to the Data Protection Authority.

## Confidentiality and Security

The personal data we collect within the context of the operation of the website are those strictly necessary for the purpose of our communication with you. They are strictly confidential and are kept only for the needs of such communication. Access to these data is provided to very few members of diFUME project team, who have been bound to keeping confidentiality. Moreover, we have adequate security systems and take all necessary and appropriate organisational and technical measures in order to prevent any breach of personal data security (leak, disclosure, unauthorised access) in our systems.

## Modification to this Personal Data Protection Policy

This personal data protection policy may change whenever necessary, always in compliance with national and Union law. For that reason, you are kindly requested to visit this page regularly in order to be informed. By navigating on and using the diFUME website, visitors/users acknowledge that they have read, understood and unconditionally accepted the Personal Data Protection Policy.

## Contact

If you have any questions relating to this personal data protection policy or if you believe that there is any vagueness or incompatibility in our personal data protection policy, you may communicate such instance to the diFUME project formal email: [difume2020@gmail.com](mailto:difume2020@gmail.com) or personally to the following contacts:

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