

Terms of Use, Personal Data Protection and Privacy Policy

The following Terms of Use, Personal Data Protection and Privacy Policy (hereinafter 'Statement') is an essential part of the VANGUARD website and its content. VANGUARD's website and its content and tools (<https://vanguard-horizon.eu/>), are hereinafter collectively referred to as the 'Website'.

a. Terms of Use

VANGUARD is a research project (hereinafter 'Project'), funded by the European Commission (hereinafter 'Granting Authority'), through Horizon Europe, with Grant Agreement number 101121282.

The Website is hosted by the Centre for Research and Technology Hellas ('CERTH') established in Greece, partner, and the coordinator of the VANGUARD consortium, and is managed by the Centre for Security Studies ('KEMEA'), also partner in the aforementioned consortium. This Statement is addressed to the visitor(s) and/or user(s) of the Website (hereinafter 'Users').

The content of this Website is produced and owned by the VANGUARD consortium and aims at providing Users with access to information about the Project activities and at disseminating the Project's results. The content of the Website, including (indicatively and not exhaustively) texts, graphics, images, videos, sounds, services, etc. (hereafter referred to as 'Content') is lawfully protected under Intellectual Property Rights Law and Copyright legislation. The VANGUARD consortium reserves all rights of use and ownership of the Content, all copies created based on it, as well as all intellectual property rights and all other property rights pertaining to it. Any use, reproduction and/or adaptation of any of the elements of the Website, regardless of the means used, is prohibited, except with the prior written consent of the Website's operators.

The material involved in this Website, along with the opinions expressed herein, reflect only the authors' views, and do not necessarily reflect those of the European Union or the European Research Executive Agency (REA). Neither the European Union nor the Granting Authority can be held responsible for them. By accessing, browsing, or using the Website (including any services, whether from the VANGUARD Website or third parties), Users declare that they have read, understood, and therefore agreed to be bound by this Statement and all applicable laws and/or regulations. Moreover, Users agree that any direct or indirect damage caused to their equipment while using the Website remains their sole responsibility and neither the Website operators nor

the Project's partners can be held responsible for it. In case Users fail to agree with this Statement or the compliance obligations, Users are asked not to use the Website.

The Terms of Use of this Website, as well as any modification or alteration thereof, shall be governed by applicable national (Greek) legislation, properly aligned with the European legal framework. If any provision of the above terms is found not to be aligned with the above legal framework, it ceases to apply automatically and shall be removed from the Website, without in any way affecting the validity of the remaining terms. These Terms of Use involve the agreement between the administrator and the visitor/Users of the website. Any amendment of this agreement must be formulated in writing to be considered.

b. Cookie Policy

To ensure the proper and effective functioning of this Website and to improve Users' navigation on it, the Website collects Users' identification data by using cookies. Cookies are also used to receive performance statistical aggregated data that can be used in VANGUARD's reports to the European Commission.

What are Cookies?

Cookies in general are "small text files that websites place on your device as you are browsing. They are processed and stored by your web browser. In and of themselves, Cookies are harmless and serve crucial functions for websites. Cookies can also generally be easily viewed and deleted"¹.

When is the use of Cookies lawful?

The storage of information or acquisition of access to stored information in Users' terminal equipment is only permitted if the Users have freely given specific consent upon clear and extensive information. An exception to the obligation to obtain consent shall be the case where Cookies are technically necessary to make the connection to the Website or to provide the Internet service.

What is the legal ground for using Cookies?

The use of optional Cookies relies only on Users' explicit consent. They have **the right to withdraw their consent** at any time. Please note that if they withdraw their consent, they will be unable to access certain areas or features of the VANGUARD website. Users' consent is not required for Cookies that are technically necessary.

¹ [Cookies, the GDPR, and the ePrivacy Directive - GDPR.eu](https://gdpr.eu/cookies-the-gdpr-and-the-eprivacy-directive)

Which categories of Cookies are collected and for what purpose?

The VANGUARD website uses temporary session Cookies stemming from the Matomo for WordPress plugin. Matomo is an open-source web analytics platform, used to measure, collect, analyse, and report visitor's data for dissemination and reporting of the project purposes. For more information, please visit: <https://matomo.org/>. Matomo settings are customized, so that the visitor's IP address is anonymized. User ID tracking and content tracking are disabled. Also, all first-party analytics Cookies and all third-party Cookies have been disabled. Essential non-analytics Cookies may be created, for which the user will be asked to consent. The user may choose to prevent this website from aggregating and analysing the actions taken here. For that reason, they will be asked whether they opt-in or opt-out of tracking. Further information on data protection at Matomo Analytics can be found [here](#).

The VANGUARD consortium makes every effort to respect Users' choices; however, there is the possibility that not all Cookies will be captured. In case such a possibility constitutes a concern, it is recommended that the Users change their cookie settings via their browser; the help function in their browser will provide them with information on how to do this.

How can Cookies be disabled?

Users can delete all Cookies that are already on their device by clearing the browsing history of their browser. This will remove all Cookies from all websites they have visited, but they may also lose some saved information (e.g., saved login details, site preferences, etc.). If they prefer to avoid the use of this site-specific Cookies, first they must disable the use of Cookies in their browser and then delete the Cookies saved in their browser associated with this website. They may use this option for preventing the use of Cookies at any time. If they would like to delete Cookies or instruct their web browser to delete or refuse Cookies, they can visit the help pages of their web browser.

- For the Chrome web browser: <https://support.google.com/accounts/answer/32050>
- For the Internet Explorer web browser: <https://support.microsoft.com/en-us/topic/how-to-delete-cookie-files-in-internet-explorer-bca9446f-d873-78de-77ba-d42645fa52fc>
- For the Firefox web browser: <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox?redirectslug=delete-cookies-remove-info-websites-stored&redirectlocale=en-US>
- For the Safari web browser: <https://support.apple.com/guide/safari/manage-cookies-and-website-data-sfri11471/mac>

For any other web browser, please visit your web browser's official web pages.

c. Privacy Policy

This policy provides detailed information about the processing of personal data when using the Website and its Content, including how Users can exercise their rights regarding their Personal Data. Personal Data are processed in accordance with all relevant laws and regulations, such as the REGULATION (EU) 2016/679 relating to the protection of the physical persons regarding personal data processing and the free circulation of these data ('GDPR').

Data Controller

The data collected on this Website are processed and controlled by the **CENTRE FOR RESEARCH AND TECHNOLOGY HELLAS (CERTH)**, headquartered in Thessaloniki, Greece, at 6th km Charilaou-Thermi Rd, 57001, Thessaloniki, that can be contacted in this email m4d_ethics@iti.gr for the relevant inquiries.

Data Collection and Processing

While using the Website, the Users may be asked to provide certain personally identifiable information that can be used to contact or identify them. Namely:

- When the Users fill in the newsletter form, the Website collects and processes Data that are deemed as personal according to the General Data Protection Regulation, which are: their first name, surname, and e-mail address. For the function of the Website's newsletter Mailchimp is used and operated by a partner of the VANGUARD Consortium. By subscribing to the Newsletter, the Users agree that their relevant data will be processed through Mailchimp.
- When the Users send an email to the contacts provided on the Website, they optionally provide the following information: first name, surname, and e-mail address. In this case, any other personal information that the Users voluntarily provided through the free text of the email may be collected and/or processed.
- During the Users' visit at the Website, certain information may be automatically collected, such as the Internet Protocol address (IP address) of their computer, browser type, and browser version, the details of the Users' visit to the Website, unique device identifiers and other diagnostic data along with Cookies information. For more details, please see the relevant Cookie Policy.

It is highlighted that this Website is not intended for minors. In case a minor gets in contact with us, through an email, their personal data will be deleted immediately.

Data Collection Purposes

Personal Data are used by VANGUARD for the purpose of the functioning of the Website and the dissemination of the material to the Users (i.e., newsletter feed, etc.), unless the information involves personal details going beyond master data or usage data, in which case, these redundant data are immediately dismissed. VANGUARD may retain communications provided by Users when an email is sent to the addresses provided therein, to process the inquiries, respond to requests and improve the Website or to give to the Users some assistance regarding the services. The information provided by the Users will be solely used to contact them, among others, for updates regarding the services, or to share newsletter information, and/or support activities in relation to the services of the project, unless the Users informs VANGUARD through an email that they do not wish to receive further communication from VANGUARD. VANGUARD will refrain from collecting special Personal Data, such as information regarding political opinions, sexual orientation, race, religious beliefs, health, criminal-law data, or other sensitive matters through this Website. Specifically, within the abovementioned framework, personal data may be collected for the following purposes:

- To provide and maintain the service provided by the Website, including monitoring the use of the Website.
- To manage the Users' subscription and respond to the Users' inquiries.
- To contact the Users by email, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, and activities, including the security updates, when necessary or reasonable for their implementation.
- To provide the Users with the newsletter, following the Users' subscription.
- To analyse data, identify usage trends and determine the effectiveness of the Website's newsletter functionality.

Legal Basis of Processing

The data processing is justified under Art. 6 (1) (a) and (f) GDPR. More specifically, regarding the personal data collected by the VANGUARD Website when the Users send an email, the processing is necessary for the purposes of the legitimate interests pursued by the Consortium (Article 6 (1f) GDPR), and in particular for communication with the Users/visitors of its Website, and the information of the scientific community and the general public about the VANGUARD consortium's work and scientific results. Regarding the personal data that the Users provide by subscribing to the Newsletter recipient list, the processing is based on the Users' previous explicit consent for this specific processing purpose (Article 6 (1a') GDPR). The consent can be withdrawn at any point by the Users, through their written inquiry to the aforementioned email address.

Third-party tools and links

The Website contains –or may contain in the future- links to or from other internet sites, such as links to the Consortium partners' individual websites, Matomo web analytics platform, used to measure, collect, analyse, and report visitor's data for dissemination and reporting of the project purposes and Mailchimp, used for the functioning of the Website's newsletter, as mentioned above. By reading this Statement, the Users acknowledge that those websites are provided by independent third parties over whom VANGUARD has no control and is not responsible for their accessibility, functionality and/or content. VANGUARD does not control these third parties' Cookies, nor can it block them.

Data Recipients and Data Transfers

The collected Personal Data may be disclosed to third parties, solely in the case that this is required in the framework of the fulfilment of legal obligations or of the aforementioned data processing purposes, in compliance with the applicable legal framework. Such disclosure could be made to official government and supervising bodies, public authorities, courts, and partners, who might have undertaken the execution of certain services and functions of the Website on behalf of VANGUARD Consortium (data processors). The processing of the personal data by the data processors is done under the explicit instructions of the VANGUARD consortium and after it is guaranteed that all the necessary technical and organizational measures have been implemented.

The VANGUARD Consortium will never transfer, sell, rent, or exchange the Users' personal data to third parties for marketing purposes. It is also highlighted that VANGUARD Consortium will not transfer the Users' personal data outside the European Union (EU) or the European Economic Area (EEA).

Specifically, the Users' information might be shared in the following situations:

- **with other Users:** when the Users share personal information or interact in any public sections within the Website with other Users, information might be viewed also by the latter,
- **in good faith, if such an action is necessary to:** a) comply with a legal obligation and/or protect against legal liability and/or in response to valid requests by competent public authorities, b) to protect and defend the rights of one or more of the partners of the Consortium, and c) to prevent or investigate potential wrongdoings in terms of the service,
- **for other purposes:** with the Users' declared consent.

Data Subjects Rights (GDPR: articles 13-21), Data Retention and Data Security

VANGUARD would like to make sure that the Users are fully aware of all their data protection rights. Every User is entitled to all the personal data rights as enshrined in the General Data Protection Regulation, including, inter alia, the following:

- **The right to access** (Art. 15)– The Users have the right to access their personal data and be informed if VANGUARD processes their personal data, about the purpose and way of their processing, their security, as well as about their rights. They can also request a free-of-charge copy of their personal data undergoing processing.
- **The right to rectification** (Art. 16)– The Users have the right to request that VANGUARD corrects any information that the Users believe is inaccurate. The Users also have the right to request VANGUARD to complete information if they believe that it is incomplete.
- **The right to erasure (“right to be forgotten”)** (Art. 17)– The Users have the right to request VANGUARD to erase their personal data, unless the processing is necessary for a specific legal purpose.
- **The right to restrict processing** (Art. 18)– The Users have the right to request VANGUARD to restrict the processing of their personal data if data is inaccurate, or the processing is unlawful, or VANGUARD no longer needs their data, or they have objections to automated processing.
- **The right to object to processing** (Art. 21)– The Users have the right to object at any time to VANGUARD’s processing of their personal data, on grounds relating to their particular situation, unless there are compelling legitimate grounds for the processing which override their interests, rights, and freedoms or for the establishment, exercise, or defence of legal claims.
- **The right to data portability** (Art. 20) – The Users have the right to request that VANGUARD transmits their personal data that has been collected to another controller, or directly to them, under certain conditions.
- **Revocation of the Users’ consent to the processing of their data** (Art. 7)- Many data processing operations are only possible with the Users’ expressed consent. The Users may revoke their consent at any time with future effect. The data processed before VANUARD receives their request may still be legally processed.

If the Users would like to exercise any of these rights, they should contact the following email: m4d_ethics@iti.gr. A response will be provided within (1) one month after receiving the request and without any cost for the Users. The above period might be extended for two (2) more months, due to the complexity or the number of the requests. In such a case, the Users will be informed of the time extension and the reasons for it, as soon as possible. In case the Users’ request is considered obviously unfounded or excessive, the VANGUARD consortium may refuse to respond to it. Finally, if the Users believe that their request has not been sufficiently satisfied or the protection of their personal data has been violated by the Website’s processing, the Users have the right to lodge a complaint with the competent Data Protection Authority. The Users’ data will be retained only for the purposes described above and only for as long as the Project exists, plus

five years, to be available for demonstration in case of an inspection or an audit, as long as required to achieve the above purposes of processing, unless a longer retention period is required by law or for the establishment, exercise or defence of legal claims, and will be erased right after that. The personal data will be used to the extent necessary to be aligned with the applicable legal obligations. The Users' consent to the Statement is construed by their submission of such information on the Website. The Website's operators declare to take all measures reasonably necessary to ensure that the Users' data is treated securely and in accordance with this Statement which was created following the provisions of the European Union's relevant legislation.

Applicable Law

Any dispute in connection with the use of the Website shall be resolved amicably, through proper negotiations between the involved parties and in good faith. In the event of any dispute arising regarding these Terms of Use or, in general, of the Website's use of the visitor/Users that cannot be resolved amicably by parties, shall be finally settled under the competent Courts of Thessaloniki, Greece.

Change of this Policy

VANGUARD may modify this Statement at any time without notice, by announcing any such modification through its Website. For that reason, it is recommended that the Users regularly reviews it to explore whether it has been revised about any major changes that would negatively impact their interests.

Contact Us

If the Users have any questions or inquiries in terms of the Statement, the Users may contact us by email in: m4d_ethics@iti.gr

This Statement was last updated on April 25th , 2024.