

# Privacy Policy GENE-SWitCH Website

The GENE-SWitCH project website strives to provide transparent Services and takes your privacy very seriously. Any personal data that is collected through the website is processed in accordance with the privacy regulations stated below. If you choose to use this Service, then you agree to the collection and use of information in relation with this Policy. We will not use or share your information with anyone except as described in this Privacy Policy.

For purposes of this agreement, “Service” refers to all resources and services offered on the GENE-SWitCH’s website which can be accessed at <https://www.gene-switch.eu/>. The terms “we,” “us,” and “our” refer to the GENE-SWitCH project. “You” refers to you, as a user of Service.

*Latest update: 30-09-2019*

## Contact details:

Personal data is processed by members of the GENE-SWitCH consortium who take appropriate measures to prevent misuse, loss, unauthorized access, unwanted disclosure and unauthorized modification. The main contact person on behalf of the GENE-SWitCH consortium is Cagla Kaya (EFFAB – European Forum of Farm Animal Breeders) who can be contacted using the following information:

Visitor address:           Dreijenlaan 2  
Postal address:            NL-6703 HA Wageningen  
Telephone:                 +31 (0) 317 41 20 06  
E-mail:                     cagla.kaya@effab.info  
Website:                    [www.effab.info](http://www.effab.info)

## 1. Consent

By accessing our Service, you accept our Privacy Policy and you consent to our collection, storage, use and disclosure of your Personal Information as described in this Privacy Policy. Each time you visit our website, or use the Service, and any time you voluntarily provide us with information, you agree that you are consenting to our collection, use and disclosure of the information that you provide, and you are consenting to receive emails or otherwise be contacted, as described in this Privacy Policy. Whether or not you register or create any kind of account with us, this Privacy Policy applies to all users of the website and the Service.

Our Service is hosted by Weebly, Inc. (“Weebly”). Weebly provides us with the online e-commerce platform that allows us to provide the Service to you. Your information, including Personal Information, may be stored through Weebly’s servers. By using the Service, you consent to Weebly’s collection, disclosure, storage, and use of your Personal Information in accordance with Weebly’s privacy policy available at <https://www.weebly.com/privacy>.

## 2. Information we collect

We may collect both “Non-Personal Information” and “Personal Information” about you. “Non-Personal Information” includes information that cannot be used to personally identify you, such as anonymous usage data, general demographic information, referring/exit pages and URLs, platform types, preferences you submit and preferences that are generated based on the data you submit and number of clicks. “Personal Information” includes information that can be used to personally identify you, such as your name, address and email address (see 2.1. Personal Data).

In addition, we may also track information provided to us by your browser when you view or use the Service, such as the website you came from (known as the “referring URL”), the type of browser you

use, the device from which you connected to the Service, the time and date of access, and other information that does not personally identify you. We use this information for, among other things, the operation of the Service, to maintain the quality of the Service, to provide general statistics regarding use of the Service and for other business purposes. We track this information using cookies, or small text files which include an anonymous unique identifier. Cookies are sent to a user's browser from our servers and are stored on the user's computer hard drive. Sending a cookie to a user's browser enables us to collect Non-Personal Information about that user and keep a record of the user's preferences when utilizing our services, both on an individual and aggregate basis (see 6. Cookies or comparable techniques).

## **2.1. Personal Data**

GENE-SWitCH processes Personal Information because of services used and/or because Personal Information was provided to GENE-SWitCH or any of the partners of the GENE-SWitCH consortium. All Personal Information will be retained for the minimum amount of time possible to ensure legal compliance and to facilitate internal and external audits if they arise. Individuals may be contacted with the request to retain Personal Information in order to be contacted for future relevant projects.

A distinction between two categories of personal data is made for the GENE-SWitCH website:

1. A contact list of people that are interested in GENE-SWitCH (excluding partners and stakeholders) is maintained in regard to communication and dissemination purposes and is therefore managed by the work package leader of WP6 Outreach, Dissemination and Training. The European Forum for Farm Animal Breeders (EFFAB) has this responsibility within the GENE-SWitCH project. It should be noted that this contact list is solely accessible to this work package leader and the Project Executive Board (PEB) and not shared with any other partner. The Project Executive Board (PEB) is granted access to this contact list by default. Should you wish to deny the PEB access to your Personal Information, a letter stating the foregoing can be sent to the main contact person (Cagla Kaya) in order to withdraw consent.
2. Project partners; for the purpose of fulfilling WP6: Dissemination, exploitation and communication, the work package leader (EFFAB) processes Personal Data of project partners for GENE-SWITCH newsletters, website, social media channels and mailings. Personal Data will be actively provided by project partners for the purpose of distribution on these channels. Only WP6 work package leader, EFFAB, will process these Personal Data.

GENE-SWITCH processes the following Personal Information; first and last name; company name; office phone number; mobile phone number; e-mail address; financial information through declarations and invoices; personal information gained through proposals and grant agreements (concerns project partners); signatures; other personal data that you actively provide, e.g. by creating a profile on the website, in correspondence through e-mail and mail, by telephone or in person.

## **2.2. Special category and sensitive data**

GENE-SWITCH processes the following special category and sensitive personal data:

- Audio-visuals (racial data); consent will be asked through consent forms for each specific event where audio-visual materials will be collected. Consents for audio-visuals can be withdrawn at any moment. In case of objections against the use of audio-visuals, we will assess whether we can meet your request. In this case, it is up to GENE-SWITCH to prove that we, in spite of your complaint, have a legitimate interest to continue processing your audio-visuals. GENE-SWITCH is obliged to delete audio-visuals from our website within two weeks in case we find legitimate reasons to honour your request.

### **3. Purpose and legal basis of data processing**

#### **3.1. Purpose of non-personal data processing**

GENE-SWITCH processes Non-Personal Information to improve the Service and customize the user experience. We also aggregate Non-Personal Information in order to track trends and analyse use patterns of the Service. This Privacy Policy does not limit in any way our use or disclosure of Non-Personal Information and we reserve the right to use and disclose such Non-Personal Information to our partners and other third parties at our sole discretion.

#### **3.2. Purpose of personal data processing**

GENE-SWITCH processes your personal data for the following purposes:

- a. Sending newsletters, advertising brochures, and other correspondence with relevant information from the project through MailChimp (an online marketing platform operated by The Rocket Science Group LLC, a company headquartered in the State of Georgia in the United States, red); your first name, last name, company name, and e-mail address are registered for this purpose. This personal data will be deleted on your request or when this service of the project ends. Read MailChimps Privacy Policy for contacts here: <https://mailchimp.com/legal/privacy/#contacts->
- b. To phone or e-mail you, if necessary, to carry out our services; your first name, last name, company name, e-mail address and phone number are processed for this purpose. This personal data will be deleted on your request or when this service of the project ends.
- c. To inform you about changes in our modus operandi; your first name, last name, company name, and e-mail address are registered for this purpose. This personal data will be deleted on your request or when this service of the project ends.
- d. To give you the opportunity to subscribe to our services; your first name, last name, company name, and e-mail address are registered for this purpose. This personal data will be deleted on your request or when this service of the project ends.
- e. To process personal data if we are legally obliged to do so, e.g. information in the grant agreement, storing invoices/declarations and other legal documents.
- f. Signatures are collected to confirm consent.
- g. Audio-visuals are collected during meetings, events, conferences, interviews and other relevant activities with the purpose of disseminating and sharing valuable content. This personal data, in case considered relevant, may be distributed on our social channels, website, e-mail, in newsletters or other relevant communication channels.

#### **3.3. Legal basis of personal data processing**

Legal basis for processing personal data:

- a. the data subject has given consent to the processing of his or her personal data for one or more specific purposes; (article 6.1.a GDPR).
- b. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract; (article 6.1.b GDPR).
- c. processing is necessary for compliance with a legal obligation to which the controller is subject; (article 6.1.c GDPR).

- d. Processing is necessary for the purposes of the legitimate interest pursued by GENE-SWitCH for allowing the day-to-day management, operation and functioning of the GENE-SWitCH project; (article 6.1f GDPR).

#### **4. Automated decision making**

GENE-SWitCH does not make decisions based on automated processing operations on matters that can have consequences for people. This statement concerns decisions taken by computer programs of systems, without involving persons.

#### **5. Retention period**

GENE-SWitCH does not store your personal data longer than strictly necessary to achieve the purposes for which your data is collected.

- Name/address/company name/e-mail/phone numbers and other personal data that has been actively provided by individuals will be retained for the minimum amount of time possible to ensure legal compliance and to facilitate internal and external audits if they arise.
- Invoices through declarations should be kept for seven years for fiscal reasons, therefore the retention period for all financial information also states seven years.
- Audio-visuals will be kept for as long as consent is given, or the project is alive, or until deemed irrelevant or outdated.

#### **6. Cookies or comparable techniques**

##### **6.1. The use of Cookies by Weebly**

Weebly and their affiliates, partners, and service providers (such as marketing, analytics, and customer support partners) may use cookies, pixels, and similar technologies for analysing trends, site administration, tracking mobile application installations, understanding how users interface with the GENE-SWitCH website, and to gather demographic information about the user base as a whole. Weebly may receive reports based on the use of these technologies by GENE-SWitCH on an individual, device specific and/or in an aggregated basis. Unless you are an EU resident, visiting Weebly with your browser set to accept cookies or other software tells us you want to use Weebly's service and you consent to Weebly's use of cookies and other technologies to provide you their service. Weebly uses cookies for a number of purposes, some of which are strictly necessary, to remember user settings such as language preferences, and for authentication as follows:

- First party cookies; used to provide basic functionality of Weebly's Service, including for authentication and security purposes, configuration, and support.
- Third party cookies; used to enable certain analytics and tracking tools, as well as interest-based advertising and chat functionality.
- Session cookies; used to enable certain analytics and tracking tools, interest-based advertising, as well as for app configuration, monitoring tools, to pin user session to a specific server, and to prevent cross site request forgery.
- Persistent cookies; provides functionality of first party cookies and third party cookies across sessions.

The use of certain cookies can be controlled at the individual browser level or in your operating system preferences. If you opt-out of such cookies, you may still use the Service, but your ability to use some

features or areas of the Service may be limited. You can find out more about your rights in relation to cookies and how to control them here: <http://www.allaboutcookies.org/>.

Weebly partners with third parties to either display advertising on our Service or to manage our advertising on other sites, such as Facebook.com. Our third party partners may use technologies such as cookies to gather information about your activities on our Service and other sites in order to provide you advertising based upon your browsing activities and interests. The use of cookies by our partners, affiliates, and service providers is not covered by this Privacy Policy.

## **6.2. The use of Cookies and comparable techniques by MailChimp**

MailChimp and their partners may use various technologies to collect and store information when you interact with GENE-SWitCH's email campaign, and this may include using cookies and similar tracking technologies, such as pixels and web beacons. For example, they use web beacons in the emails sent on behalf of GENE-SWitCH. When you receive and engage with a campaign from GENE-SWitCH, web beacons track certain behaviour such as whether the email sent through the MailChimp platform was delivered and opened and whether links within the email were clicked. They also allow MailChimp to collect information such as your IP address, browser, email client type, and other similar details. MailChimp uses this information to measure the performance of GENE-SWitCH's email campaigns, and to provide analytics information and enhance the effectiveness of their services.

## **7. Links to other websites**

As part of the Service, we may provide links to or compatibility with other websites or applications. However, we are not responsible for the privacy practices employed by those websites or the information or content they contain. This Privacy Policy applies solely to information collected by us through the Service. Therefore, this Privacy Policy does not apply to your use of a third-party website accessed by selecting a link via our Service. To the extent that you access or use the Service through or on another website or application, then the privacy policy of that other website or application will apply to your access or use of that site or application. We encourage our users to read the privacy statements of other websites before proceeding to use them.

## **8. Age of consent**

By using the Service, you represent that you are at least 18 years of age.

## **9. View, modify or erase personal data**

You are entitled to view, correct or erase your personal data at any time. Likewise, you have the right to object to the processing of your personal data by GENE-SWitCH. You are also entitled to data portability. This means that you can submit a request to us to send the personal information we have available to you or another organization. Moreover, you have the right to withdraw your consent to data processing. The processing of your personal data will then be stopped immediately. However, it should be noted that withdrawal of your consent does not have a retroactive effect. This means that all processing operations that have already taken place remain legitimate

You have the right at any time to prevent us from sending you newsletters, advertising brochures, and other correspondence with relevant information from the project through MailChimp. When we send correspondence to a user via MailChimp, the user can opt out of any further communications by following the unsubscribe instructions provided in each e-mail send via MailChimp.

You can send a request to view, correct, delete or transfer your personal data or request to cancel your consent or object to the processing of your personal data to the main contact person Cagla Kaya ([cagla.kaya@effab.info](mailto:cagla.kaya@effab.info)). We will try to respond as quickly as possible, but within four weeks. In case we need more time to assess your request due to unexpected reasons, we will inform you about this

within the four weeks mentioned. To ensure that the access request has been made by you, we ask you to send a copy of your ID along with the request. Please make the Machine Readable Zone (MRZ), passport number, and citizen number black to protect your privacy. We will respond as quickly as possible, but within four weeks, followed by deletion of your passport copy.

NOTE: we would like to inform you that the above mentioned rights are no absolute rights. Under certain circumstances we might not be able to honour a specific request. We will assess any objection to the use of personal data individually. In case that we are not able to meet a specific request, you will be informed with the corresponding arguments. In any case you have the subsequent right to consult a lawyer and go to court.

## **10. Methods**

GENE-SWitCH processes personal data using computers and IT enabled tools. External parties such as providers, mail carriers, hosting providers, IT companies, and communication agencies may be appointed to process the data as well. GENE-SWitCH has prepared and shared guidelines regarding the processing of personal data, which include the following minimal measurements:

1. Security software, such as a virus scanner and firewall are obliged to be installed on all computers that are used for accessing personal data.
2. In case personal data is send to a third party, there needs to be a processing contract in place.

## **11. Protection of Personal Information**

We implement reasonable precautions and follow industry best practices in order to protect your Personal Information and ensure that such Personal Information is not accessed, disclosed, altered or destroyed. However, these measures do not guarantee that your information will not be accessed, disclosed, altered or destroyed by breach of such precautions. By using our Service, you acknowledge that you understand and agree to assume these risks.

## **12. Reporting Personal Data Breaches**

In case of Personal Data Breaches or a reasonable suspicion of a Personal Data Breach, the partner in stake must inform their company or organisations DPO/contact person. The DPO/contact person should inform GENE-SWitCH's main contact person Cagla Kaya (cagla.kaya@effab.info) without undue delay and not later than 24 hours after having become aware of it.

## **13. Changes to our Privacy Policy**

GENE-SWitCH reserves the right to update this Privacy Policy at any time. If we decide to change this Privacy Policy, we will post these changes on this page so that you are always aware of what information we collect, how we use it, and under what circumstances we disclose it. Any such modifications become effective upon your continued access to and/or use of the Service five (5) days after we first post the changes on the website or otherwise provide you with notice of such modifications. It is your sole responsibility to check this website from time to time to view any such changes to the terms of this Privacy Policy. If you do not agree to any changes, if and when such changes may be made to this Privacy Policy, you must cease access to this website. If you have provided your email address to us, you give us permission to email you for the purpose of notification as described in this Privacy Policy.