



# LIV\_IN Website Privacy Policy

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# 1. Privacy Policy

## **LIV\_IN Website Privacy Policy**

This Policy explains which personal data are collected during visits to the LIV\_IN website or when content provided under the "living-innovation.net" domain is accessed and how the Vienna University of Economics and Business, the representing legal entity of the LIV\_IN project deals with these data. In the following the Vienna University of Economics and Business will be abbreviated with "WU". The Policy also provides information on the rights of data subjects pursuant to data protection law.

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### 1.1 Object and Purpose

The WU seeks to ensure the privacy of its website users.

This Policy explains which personal data are collected during visits to the LIV\_IN website or when content provided under the "living-innovation.net" domain is accessed and how the WU project deals with these data. The Policy also provides information on the rights of data subjects pursuant to data protection law.

This Policy refers to both the private and public sections of the LIV\_IN virtual community platform. For competitions (such as our video competition), available on our website, additional terms and conditions and privacy policies apply.

The LIV\_IN project consortium partners may run individual websites. The respective consortium partners are responsible for the content provided there. The data collected on these websites may include additional types of personal data that are not listed in this Policy.

### 1.2 Collection and Use of Personal Data

#### **1.2.1 Data collected when visiting the website**

In line with common practice, WU collects those data that are transmitted automatically during visits of its publicly accessible website. These data are recorded in server log files. This applies to the following types of data:

- The IP address from which the website is accessed
- Access date and time
- Access method (e.g. GET)
- URL visited

- Access protocol (e.g. HTTP/1.1)
- HTTP response code
- File size
- Previously visited URL (referrer URL)
- Operating system and browser type (user agent)

Log files are saved for a period of 10 years.

The WU uses this information to generate anonymized usage statistics, to ensure correct operation, and to monitor website performance. The WU's legitimate interests are the legal basis for processing this data.

### **1.2.2 Use of Data Based on a Declaration of Consent**

Whenever the WU processes data based on a declaration of consent, the WU will inform the data subjects concerned separately and in advance and ask them for their consent. In any case, the data subjects have the right to withdraw their consent at any time. A withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

The WU is processing personal data based on the data subjects' consent concerning the following purposes:

- a) Newsletter  
*see paragraph 1.2.4 below*
- b) Registration for accessing all features of the LIV\_IN platform:

The data that is retrieved via the online form (in particular first name, last name, email-address, telephone number, gender, user-name, country, age, picture, expertise, interests and motivation) is processed for the purpose of administering the participation in the LIV\_IN platform.

The data is transmitted to WU's data processors (e.g. Siveco) for the purpose of technical administration.

The data is stored until 2 years after the termination of the project duration (April 2021) and will then be deleted.

### **1.2.3 Online Contact**

If a person contacts WU via e-mail or via the contact form on the LIV\_IN website, the disclosed personal data of this person will be saved and processed for the purpose of answering his/her query(ies) and of contacting the person concerned. Legal basis for the data processing is the legitimate interest of the WU in accordance with Art 6 para 1 lit f GDPR.

#### **1.2.4 Newsletter**

On the LIV\_IN website, users are given the opportunity to subscribe to our newsletter. The input mask used for this purpose determines what personal data are transmitted, as well as when the newsletter is ordered from the controller.

The LIV\_IN project regularly informs interested parties by means of a newsletter about project events, opportunities for participating in the Virtual Community, news and best practices in the fields of Smart Homes and Smart Health and other relevant information relating to Responsible Innovation. The LIV\_IN newsletter may only be received by the data subject if (1) the data subject has a valid e-mail address and (2) the data subject registers for the newsletter. Upon registration for the newsletter a confirmation e-mail will be sent to the e-mail address registered by the data subject (double-opt-in procedure). The newsletter is sent on the basis of the user's consent pursuant to Art 6 para 1 lit a, Art 7 DSGVO in conjunction with § 107 para 2 TKG 2003 (Austrian Telecommunications Act). The consent may be revoked at any time. For the purpose of revocation of consent, the corresponding link in each newsletter may be used.

During the registration for the newsletter, we also store the IP address of the computer system assigned by the Internet service provider (ISP) and used by the data subject at the time of the registration, as well as the date and time of the registration. The collection of this data is necessary in order to understand the (possible) misuse of the e-mail address of a data subject at a later date, and it therefore serves the aim of the legal protection of the controller. The registration procedure is recorded on the basis of our legitimate interests pursuant to Art 6 para 1 lit f GDPR. Our interest is directed towards the use of a user-friendly and secure newsletter system.

The personal data collected as part of a registration for the newsletter will only be used to send our newsletter. In addition, subscribers to the newsletter may be informed by e-mail, as long as this is necessary for the operation of the newsletter service or a registration in question, as this could be the case in the event of modifications to the newsletter offer, or in the event of a change in technical circumstances. There will be no transfer of personal data collected by the newsletter service to third parties.

The newsletters are sent by the mail service "MailChimp", a newsletter platform of the US provider Rocket Science Group, LLC, 675 Ponce De Leon Ave NE #5000, Atlanta, GA 30308, USA (privacy policy of MailChimp: <https://mailchimp.com/legal/privacy/>). The Rocket Science Group LLC d/b/a MailChimp is certified under the Privacy Shield Agreement and thus offers a guarantee to comply with the European data protection level (<https://www.privacyshield.gov/participant?id=a2zt0000000TO6hAAG&status=Active> ).

When receiving the newsletter, data is collected on the time of electronic delivery and opening of the e-mails, click behaviour, IP addresses and e-mail programs used. We use this data to make our newsletter as user-friendly and intuitive as possible and to find out the most interesting topics for the recipients of our

newsletter. The processing of these personal data is based on our legitimate interests (Art 6 para 1 lit f GDPR).

### **1.2.5 Cookies**

The LIV\_IN website uses cookies. These are small pieces of data stored on the visitor's device when the LIV\_IN website is accessed. Cookies allow the LIV\_IN website to remember certain actions and settings (e.g. login / registration, language selection, font size and other display preferences) for a certain period, as long as the cookie remains stored on the user's device.

In particular, the WU website uses cookies to adjust the display settings of the website to the device used and to optimize the usability of the website for the visitor. Cookies are also used for analytical purposes (more information in paragraph 1.2.6), to optimize WU's systems and improve the quality of its web pages.

Cookies can be disabled altogether in the browser settings. In some cases, however, this may affect the usability of the LIV\_IN website. Stored cookies can be deleted at any time in the web browser settings.

When browsing on our Website, without disabling cookies, you agree to the usage of cookies. The processing is based on the legal provision of § 96 para 3 TKG 2003. Furthermore the data is processed based on WU's legitimate interests (Art 6 para 1 lit f GDPR).

### **1.2.6 Google Analytics**

For statistical purposes, website access is evaluated based on our legitimate interest (Art 6 para 1 lit f GDPR).

On this website, the component of Google Analytics (with the anonymizer function) has been integrated. Google Analytics is a web analytics service. Web analytics is the collection, gathering, and analysis of data about the behavior of visitors to websites. A web analysis service collects, inter alia, data about the website from which a person has come (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed.

The operator of the Google Analytics component is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland („Google“). Google is certified under the EU-US Privacy Shield (<https://www.privacyshield.gov>). For the transfer of data to Google servers in the USA, an adequate level of data protection is therefore guaranteed.

For the web analytics through Google Analytics we use the application "\_gat.\_anonymizeIp". By means of this application the IP address of the Internet connection of the data subject is abridged by Google and anonymised when accessing our websites from a Member State of the European Union or another Contracting State to the Agreement on the European Economic Area.

Google Analytics places a cookie on the device of the data subject. The definition of cookies is explained above. With the setting of the cookie, Google is enabled to analyze the use of our website. With each call-up to one of the individual pages of this Internet site, which is operated by us and into which a Google Analytics component was integrated, the Internet browser on the device of the data subject will automatically submit data through the Google Analytics component

The information collected about your use of this website will be transmitted to and stored by Google on servers in the United States. Google uses the collected data and information, inter alia, to evaluate the use of our website and to provide online reports, which show the activities on our websites, and to provide other services concerning the use of our Internet site for us. Google may also transfer this information to third parties to the extent required by law, or insofar as such third parties process the information on Google's behalf.

The personal data of the users will be deleted or anonymized after 14 months.

The data subject may, as stated above, prevent the setting of cookies through our website at any time by means of a corresponding adjustment of the web browser used and thus deny the setting of cookies. Such an adjustment to the Internet browser used would also prevent Google Analytics from setting a cookie on the device of the data subject. In addition, cookies already in use by Google Analytics may be deleted at any time via a web browser or other software programs.

In addition, the data subject has the possibility of objecting to a collection of data that are generated by Google Analytics, which is related to the use of this website, as well as the processing of this data by Google and the chance to preclude any such. For this purpose, the data subject must download a browser add-on under the link [tools.google.com](http://tools.google.com) and install it. As long as this add-on is installed, no data and information about visits to internet pages will be transmitted to Google.

Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.de/intl/de/policies/privacy/> and under <http://www.google.com/analytics/terms/de.html> . Google Analytics is further explained under the following Link [https://www.google.com/intl/de\\_de/analytics/](https://www.google.com/intl/de_de/analytics/) .

### **1.2.7 Transmission of Collected Data**

The WU does not transmit the personal data collected on the publicly accessible LIV\_IN website to third parties, unless otherwise specified in statutory provisions and in this Privacy Policy.

### **1.2.8 Data subject rights**

Pursuant to the applicable data protection laws, in particular Articles 15 through 21 of the General Data Protection Regulation (GDPR), data subjects at all times have the following rights:

- The right to obtain information about any of their personal data that are being processed
- The right to rectification of inaccurate information and the completion of incomplete data
- The right to erasure of personal data, which may however be limited in certain cases specified by law, especially due to statutory data retention periods the WU is subject to, the right of freedom of expression, archiving purposes in the public interest, or scientific research purposes
- The right to restriction of processing
- The right to receive the personal data they have provided in a structured, commonly used, and machine-readable format (right to data portability)
- The right to object, on grounds relating to the data subject's particular situation, to the processing of personal data. This applies if the data are processed for the performance of a task carried out in the public interest, in the exercise of official authority vested in the LIV\_IN project WU, or based on a comparative assessment of interests. If a data subject lodges such an objection, the WU will no longer process his or her personal data, unless the WU demonstrates compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject or unless the data processing is required for the establishment, exercise, or defense of legal claims (GDPR Art. 21 (1)).
- The right to object to the processing of personal data concerning the data subject for purposes of direct marketing. If a data subject lodges such an objection, WU will no longer process his or her personal data for these purposes.
- Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1), the data subject, on grounds relating to his or her particular situation, shall have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Requests to exercise any of these rights can be directed to the office indicated in the "Contact" section below.

Some of the services offered on the WU website that require a login allow the user to change or amend their personal data themselves.

In addition, data subjects have the right to file a complaint with the supervisory authority if they feel that their rights may have been violated or that WU may have violated its obligations under data protection law. In Austria, the appropriate supervisory authority is the Austrian Data Protection Authority, Wickenburggasse 8, 1080 Vienna.



### **1.2.9 Liability for External Links**

The LIV\_IN website may contain links to external, i.e. third-party websites that are not under the control of the WU. The WU has no influence over the contents and data protection standards of linked pages. WU shall therefore not be held liable for any external links.

### **1.2.10 Data Security**

The WU takes appropriate technical and organizational measures to protect the data subjects' personal data against accidental or unlawful destruction, loss, and unauthorized access.

### **1.2.11 Contact**

For questions or requests related to data protection, data subjects can contact WU's Data Protection Officer. Further information is available online at <https://www.wu.ac.at/en/datenschutz/>.

Vienna, February 18<sup>th</sup> 2019