# R1.7 PRIVACY POLICY & PROCEDURES

| Title | R1.7 Privacy Policy & Procedures |
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| Lead Partner | P6 - APIROPLUS SOLUTIONS LTD |
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# 1 EXECUTIVE SUMMARY

The REWIRE project will process personal data, during the implementation of the various project tasks. The protection of the related personal data and of the rights and freedoms of the data subject is of importance to the REWIRE project.

This document contains an accounting of the basic processes that have been designed and implemented by the REWIRE project on the subject of personal data processing and protection.

These processes have started with the beginning of the project and will continue until the very end.

A continuous process has been designed to collect and monitor the personal data processed by the REWIRE project and keep a relevant record.

A Data protection policy has been created, providing the basic principles and rules regarding personal data processing within the REWIRE project.

Each project partner will monitor its compliance to the applicable legal and regulatory framework and comply to the REWIRE data protection policy.

This document contains the results of the actions performed until month 6 of the project; relevant updates will be implemented throughout the project life.

The results of the activities and the updates will be included in the relevant official reporting of the project and will reside at the project repository.

# 2   INTRODUCTION

The Cybersecurity Skills Alliance – New Vision for Europe – **REWIRE** project develops a Blueprint for the Cybersecurity industry and a concrete European Cybersecurity Skills Strategy. It brings together 25 partners from academia and VET, cybersecurity industry, non-cyber industries, certification partners and umbrella organizations. Its work builds upon four pilot projects: CONCORDIA, SPARTA, ECHO, CyberSec4Europe implemented with the support of the European Union's Horizon 2020 research and innovation programme.

The work to be carried out during the REWIRE project life cycle has been split in 7 distinct Work Packages:

  WP1   Management and Coordination
  WP2   Cybersecurity Skills: Status quo and European Cybersecurity Skills Strategy
  WP3   Design of the European Cybersecurity Blueprint
  WP4   Blueprint Toolbox - Tools directly connected to education, training and certification
  WP5   Blueprint Toolbox - Tools connected to the promotion, connection and guidance
  WP6   Quality Assurance and Evaluation
  WP7   Dissemination and Exploitation of Results

Since within all these work packages, personal data will be processed, it is of great importance that the relevant requirements (internal and external) be analyzed and relevant procedures, policies and actions be derived and implemented.

# 3   METHODOLOGY

In order to design a systematic approach to the protection of personal data within the REWIRE project the following tasks have been selected for implementation.

The tasks cover all the steps of the PDCA management method used in business for the control and continuous improvement of processes and products.

The following table depicts the various actions being performed or planned to be performed, as part of the personal data protection management of the REWIRE project:

| | |
|---|---|
| **PLAN** | 1. Analyse existing regulatory and legal environment in relation to personal data protection within the context of the REWIRE project.<br>2. Collect an initial estimation of personal data that will be processed by the project partners as part of their activities within the REWIRE project.<br>3. Analyze the received information on processed personal data, analyze the relevant risks to the rights and freedoms of the data subjects.<br>4. Design a general policy to be adopted by all partners of the REWIRE project in relation to the processing of personal data and assign a Data Protection Officer for the REWIRE project.<br>5. Design relevant additional procedures. |
| **DO** | 1. Implement the privacy policy.<br>2. Implement relevant additional procedures.<br>3. Provide awareness training to the partners of the REWIRE project regarding the processing of personal data.<br>4. Respond to requests as needed.<br>5. Regularly update the information in collaboration with the project partners, in relation to processed personal data and plan actions if needed. |
| **CHECK** | 1. Review the correct operation, application and effectiveness of the implemented processes. |
| **ACT** | 1. Implement corrective actions where needed.<br>2. Update relevant documentation and practice. |

*Table 1. Personal Data Management actions*

The preparation for the above activities and methodology have started with at the beginning of the project and will continue to be carried out as described above, for the entire duration of the project.

Updates and feedback will be received throughout the duration of the project and relevant amendments, updates or other actions will be performed accordingly.

# 4 ANALYSIS

## TASK 1. ANALYSIS OF EXISTING REGULATORY AND LEGAL ENVIRONMENT IN RELATION TO PERSONAL DATA PROTECTION WITHIN THE CONTEXT OF THE REWIRE PROJECT.

This section contains the information collected by the project team in relation to applicable regulations and laws in relation to personal data protection.

In relation to the GDPR, the section contains basic definitions and introduces the basic principles for processing, to facilitate the understanding of the next sections and the rationale of the Privacy Policy of the REWIRE project.

### 4.1.1 Regulatory framework

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

The regulation is an essential step to strengthen individuals' fundamental rights in the digital age and facilitate business by clarifying rules for companies and public bodies in the digital single market. A single law will also do away with the current fragmentation in different national systems and unnecessary administrative burdens.[1]

The regulation entered into force on 24 May 2016, applies since 25 May 2018 and can be found HERE.

The official title of the regulation is REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) and hereafter will be referenced as GDPR.

#### 4.1.1.1 Basic Definitions

To facilitate the understanding of the rationale of the actions and documents implemented within the REWIRE project in relation to personal data protection, it is important to provide the following definitions (all definitions are transcribed from the GDPR[2]):

> *'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;*

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[1] Data protection in the EU | European Commission (europa.eu)
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32016R0679#d1e1374-1-1

*'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;*

*'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;*

*'processor' means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller;*

*'consent' of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;*

*'personal data breach' means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed;*

### 4.1.1.2 Principles relating to processing of personal data

The principles lie at the heart of the GDPR. They are set out right at the start of the legislation, and inform everything that follows. They don't give hard and fast rules, but rather embody the spirit of the general data protection regime - and as such there are very limited exceptions. Compliance with the spirit of these key principles is therefore a fundamental building block for good data protection practice. It is also key to your compliance with the detailed provisions of the GDPR.[3]

Failure to comply with the principles may lead to personal data breaches and / or fines imposed by the relevant supervisory authorities.

GDPR introduces the following principles (Article 5, GDPR):

**(A) LAWFULNESS, FAIRNESS AND TRANSPARENCY**

meaning that personal data should be processed lawfully, fairly and in a transparent manner in relation to the data subject.

GDPR in Articles 6 -14, describes actions that need to be implemented in order to achieve compliance to this principle. Amongst others these articles define (a) the conditions / methods under which processing of personal data is lawful and (b) the information that needs to be shared with the data subjects to ensure that the information and the modalities for the exercise of the rights of the data subject are transparently communicated.

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[3] The principles | ICO

**(B) PURPOSE LIMITATION**

Meaning that personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

**(C) DATA MINIMISATION**

Meaning that personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

**(D) ACCURACY**

Meaning that personal data shall be accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

**(E) STORAGE LIMITATION**

Meaning that personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;

**(F) INTEGRITY AND CONFIDENTIALITY**

Meaning that personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;

**(G) ACCOUNTABILITY**

Meaning that the controller shall be responsible for, and be able to demonstrate compliance with all the principles mentioned above.

## 4.1.2 Data protection Laws

The following table contains the DPA law and authority per project partner country.

| Country | Authority | DPA law |
|---------|-----------|---------|
| Austria | Austrian Data Protection Authority | Federal Act concerning the Protection of Personal Data (DSG) |
| Belgium | Data Protection Authority | JULY 30, 2018 - Law on the protection of natural persons with regard to the processing of personal data |

| Country | Authority | DPA law |
|---|---|---|
| Cyprus | Office of the Commissioner for Personal Data Protection | Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(I)/2018) |
| Czech | The Office for Personal Data Protection | Act No. 110/2019 Coll. Act of 12 March 2019 on personal data processing (Consolidated version of 24 April 2019) |
| Estonia | Data Protection Inspectorate | Personal Data Protection Act |
| France | CNIL | Décret n° 2019-536 du 29 mai 2019 pris pour l'application de la loi n° 78-17 du 6 janvier 1978 relative à l'informatique, aux fichiers et aux libertés |
| Greece | Hellenic Data Protection Authority (HDPA) | Law 4624/2019 |
| Hungary | National Authority for Data Protection and Freedom of Information | Act CXII of 2011 on Informational Self-Determination and Freedom of Information ("Privacy Act"), (upd. 20.06.2019) |
| Lithuania | State Data Protection Inspectorate | REPUBLIC OF LITHUANIA, LAW ON LEGAL PROTECTION OF PERSONAL Recast since 16/07/2018: No. XIII-1426, 2018-06-30, published in TAR 11/07/2018, i. k. 2018-11733 |
| Portugal | Portuguese data protection authority | Law No. 58/2019 of August 8, PERSONAL DATA PROTECTION ACT (UPDATED VERSION) |
| Serbia | COMMISSIONER FOR INFORMATION OF PUBLIC IMPORTANCE AND PERSONAL DATA PROTECTION | Law on Personal Data Protection ("Official Gazette of RS" No. 97/08, 104/09 - other law, 68/12 – decision of the CC and 107/12) - ceased to be in force on 22 August 2019, at the date of commencement of application of the Law on Personal Data Protection ("Official Gazette of RS" No. 87/2018). |
| Spain | Spanish Data Protection Agency | Organic Law 3/2018, of December 5, on the Protection of Personal Data and guarantee of digital rights. |
| Sweden | Swedish Authority for Privacy Protection (IMY) | Act containing supplementary provisions to the EU General Data Protection Regulation (SFS 2018:218) |

**Table 2.** *National Data Protection Laws and decrees per project partner country*

Each partner is obligated to uphold the national laws as well as the GDPR. Each partner has a specific method, procedures and policies regulating their compliance to these laws and regulations.

It stands to reason that any personal data collected for the purposes of the REWIRE project will be processed in accordance to the above mentioned GDPR principles, irrespective of the country or the partner performing the processing.

## TASK 2. COLLECT AN INITIAL ESTIMATION OF PERSONAL DATA THAT WILL BE PROCESSED BY THE PROJECT PARTNERS AS PART OF THEIR ACTIVITIES WITHIN THE REWIRE PROJECT.

As mentioned in the beginning of the document, the work to be carried out within the REWIRE project is expected to need the processing of personal data.

In order to identify exactly the areas, categories, types and purposes for the processing of personal data, a survey was conducted the contribution of all project partners.

Specifically, the survey consisted of two parts:
1. Provision of information on the main definitions of Personal and Non-personal data, on the categories of personal data, as well as a full example of different categories of data that could be processed by a partner within the Rewire Project. An example of this information is presented in Annex A.
2. Request for information regarding the estimated / envisioned processing of personal and non-personal data by the partners during their work within the REWIRE project.

The requested information per partner was:

- Contact point for Data.
- Communication email.
- Type of Data.
- Description of Data.
- Purpose of processing.
- Task under which the data will be processed / generated / processed.
- Source of the Data.
- Whether the information or the output is proprietary or not.

## TASK 3. ANALYSE THE RECEIVED INFORMATION ON PROCESSED PERSONAL DATA, ANALYSE THE RELEVANT RISKS TO THE RIGHTS AND FREEDOMS OF THE DATA SUBJECTS.

The information collected from Task 2, was subsequently analysed. The results of this analysis are displayed below.

| Categories of data | Purpose of processing |
|---|---|
| Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| Contact data, i.e., names, titles, organisations, e-mail address of subscribers to the newsletter / events etc | Dissemination of information about events and the project. |
| Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| Photos - Videos (from events, meetings and other activities) | Dissemination of information about events and the project. |
| User information and activity | To provide access to the shared space of the project files |
| Employment information of involved staff members of the project partners, timesheets (related to the REWIRE project), contacts | Management of the project by the Coordinator and the individual partners |
| Communications (emails) | Email communication between the partners for the implementation of the project and the coordination of the related work. |
| Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| Identification information i.e., name, username, IP, location, year of birth | Provision of access to the VOOC platform. |

| Categories of data | Purpose of processing |
|---|---|
| Training related information i.e. Participation in courses, duration, date, location etc. | Provision of training services. |
| Trainer's information (i.e. short bio information, name, affiliation, role, company etc) | Provision of training services. |
| Certification exam related information i.e. name, year of birth, country, exams taken, attempts, results, exam pre-requisites relating to education and experience etc. | Provision of skills certification services. |
| Social media accounts and interaction | Communication of project outcomes to the general public |
| Publication information (i.e. name of the author, affiliation etc) | Dissemination of the results of the project. |
| Cookies (VOOC platform) | Provision of access to the MOOC platform. |
| Cookies (Website) | Correct operation of the website |

*Table 3. Categories of personal data processed by the REWIRE project and related purposes*

The table above was elaborated on the basis of the questionnaire which was designed by P6 - APIROPLUS SOLUTIONS LTD and shared with all consortium partners. As referred above, all project partners were invited to provide feedback to this questionnaire. Its purpose is to provide a current snapshot of the status of data processing and personal data activities within the REWIRE project, as envisioned at this point of time by the project partners.

The information from the received questionnaires was consolidated in one file, which will serve as a simplified record of the processing activities of the REWIRE project. The file will reside in the project space managed by the Coordinator (Mykolo Romerio Universitetas Teams).

The file will be updated as part of the regular update implemented by P6 - APIROPLUS SOLUTIONS LTD or whenever necessary (e.g. due to changes, new activities etc). The new updated version will remain at the same location in the repository and the history of changes will be retained.

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| **1** | Task 1.1. Managing work plan activities M1-M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of | Stakeholder engagement, communication of project outcomes to the general public and stakeholders |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | | stakeholders, committees and groups | including recommendations to policymakers, dissemination, exploitation activities. |
| | | Communications (emails) | Email communication between the partners for the implementation of the project and the coordination of the related work. |
| | | Employment information of involved staff members of the project partners, timesheets (related to the REWIRE project), contacts | Management of the project by the Coordinator and the individual partners |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | Task 1.2. Coordination and Communication M1-M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Communications (emails) | Email communication between the partners for the implementation of the project and the coordination of the related work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | User information and activity | To provide access to the shared space of the project files |
| | Task 1.3. Open Data Management and Data Protection M1-M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Communications (emails) | Email communication between the partners for the implementation of the project and the coordination of the related work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| 2 | Task 2.1. PESTLE Analysis | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | M1-M3 | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 2.2. Cybersecurity Skills Needs Analysis M4-M8 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 2.3. Development of Cybersecurity Skills Strategy M9-M12 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| 3 | Task 3.1. Blueprint Governance model M1-M24 | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 3.2. Blueprint design M1 – M24 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| | Task 3.3. Development of the European Cybersecurity Skills Framework M13 – M19 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of | Stakeholder engagement, communication of project outcomes to the general public and stakeholders |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | | stakeholders, committees and groups | including recommendations to policymakers, dissemination, exploitation activities. |
| | Task 3.4. Mapping the framework to existing courses and schemes<br><br>M20 – M24 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| | Task 3.5. Cybersecurity career pathway analysis<br><br>M20– M24 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| | Task 3.6. Finalization of the European Cybersecurity Blueprint<br><br>M25 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| 4 | Task 4.1. Setting up a Cyberrange<br><br>M14 – M28 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 4.2 Design and development of the REWIRE | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | Curricula and Training Framework  M27 – M33 | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 4.3. Scenario Sharing Platform  M29 – M33 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 4.4. Development of the REWIRE Virtual Learning Environment (VLE)  M27 – M46 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 4.5. Cybersecurity VOOC's delivery  M37 – M44 | Identification information i.e., name, username, IP, location, year of birth | Provision of access to the VOOC platform. |
| | | Training related information i.e. Participation in courses, duration, date, location etc. | Provision of training services. |
| | | Cookies (VOOC platform) | Provision of access to the MOOC platform. |
| | | Trainer's information (i.e. short bio information, name, affiliation, role, company etc) | Provision of training services. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Certification exam related information i.e. name, year of birth, country, exams taken, attempts, results, exam pre-requisites relating to education and experience etc. | Provision of skills certification services. |
| | Task 4.6. Design of Certification Schemes for selected Cybersecurity Occupational Profiles | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | M27 – M33 | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Certification exam related information i.e. name, year of birth, country, exams taken, attempts, results, exam pre-requisites relating to education and experience etc. | Provision of skills certification services. |
| 5 | Task 5.1. Design and Development of the Digital European Cybersecurity Skills Observatory<br><br>M25 – M35 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 5.2. Annual Cybersecurity Skills Trends Reports<br><br>M18 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 5.3. REWIRE Fiches<br><br>M13 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 5.4. Policy Recommendation<br><br>M13 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of subscribers to the newsletter / events etc | Dissemination of information about events and the project. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 5.5. Cybersecurity SSA Network building / Campaign<br><br>M25 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of subscribers to the newsletter / events etc | Dissemination of information about events and the project. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 5.6. REWIRE National Endorsement Events M45 – M46 | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of subscribers to the newsletter / events etc | Dissemination of information about events and the project. |
| | | Photos - Videos (from events, meetings and other activities) | Dissemination of information about events and the project. |
| | Task 5.7. Action plan for the European Cybersecurity Blueprint sustainability M37 – M42 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| 6 | Task 6.1. Quality Assurance Committee and Quality Assurance Plan M1 – M3 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 6.2. Continuous quality control M4 – M36 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 6.3. Quality Assurance of training content – EQAVET application M4 – M36 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| 7 | Task 7.1. Stakeholders' Analysis | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | M1 – M48 | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Communications (emails) | Email communication between the partners for the implementation of the project and the coordination of the related work. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of stakeholders, committees and groups | Stakeholder engagement, communication of project outcomes to the general public and stakeholders including recommendations to policymakers, dissemination, exploitation activities. |
| | Task 7.2. Targeting policy-makers at all levels M1 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Social media accounts and interaction | Communication of project outcomes to the general public |
| | | Photos - Videos (from events, meetings and other activities) | Dissemination of information about events and the project. |
| | Task 7.3. Dissemination Plan M1 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Social media accounts and interaction | Communication of project outcomes to the general public |
| | | Photos - Videos(from events, meetings and other activities) | Dissemination of information about events and the project. |
| | | Publication information (i.e. name of the author, affiliation etc) | Dissemination of the results of the project. |

| WP | Task | Categories of data | Purpose of Processing |
|---|---|---|---|
| | Task 7.4. REWIRE/SSA Website M3 – M48 | Publication information (i.e. name of the author, affiliation etc) | Dissemination of the results of the project. |
| | | Contact data, i.e., names, titles, organisations, e-mail address of subscribers to the newsletter / events etc | Dissemination of information about events and the project. |
| | | Cookies (Website) | Correct operation of the website |
| | | Photos - Videos (from events, meetings and other activities) | Dissemination of information about events and the project. |
| | Task 7.5. Portfolio of dissemination material M5 – M48 | Contact data, i.e., names, titles, organisations, e-mail address of the partners | Communication between the partners, coordination of the project, implementation of project work. |
| | | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | Task 7.6. Final Conference M48 | Communications (emails) | Email communication with interested parties in order to provide information, clarify issues, satisfy requests etc. |
| | | Social media accounts and interaction | Communication of project outcomes to the general public |
| | | Photos - Videos (from events, meetings and other activities) | Dissemination of information about events and the project. |
| | Task 7.7. Exploitation Plan M30 – M48 | Participation information, opinions as reflected in the minutes of meetings | Coordination of the tasks, implementation of project work, management of the project work. |
| | | Publication information (i.e. name of the author, affiliation etc) | Dissemination of the results of the project. |

*Table 4.* *Categories of personal data processed by the REWIRE project and related purposes per task and work package.*

The analysis of the collected information as depicted in Tables 3, 4 provided that the type of processing envisioned to be implemented during the REWIRE project is not likely to result in a high risk to the rights and freedoms of natural persons. As such no assessment of the impact of the envisaged processing operations on the protection of personal data need to be conducted at this time.

The personal data processing identification and monitoring will be on-going throughout the lifetime of the REWIRE project. In case that changes mandate it, then a relevant assessment of the impact of the envisaged processing operations on the protection of personal data will be performed utilizing an acceptable methodology.

In that case, the file of the impact assessment, the methodology and the resulting actions will be created by P6 - APIROPLUS SOLUTIONS LTD and retained in the project space.

Risks associated to the processing of personal information are included in the Risk Assessment file retained by P18 – Research Innovation and Development Lab – Readlab as part of Task 6.1.

## TASK 4. DESIGN A GENERAL POLICY TO BE ADOPTED BY ALL PARTNERS OF THE REWIRE PROJECT IN RELATION TO THE PROCESSING OF PERSONAL DATA AND ASSIGN A DATA PROTECTION OFFICER FOR THE REWIRE PROJECT.

### 4.4.1 Introduction

The principles and activities implemented by the REWIRE project are consolidated and included in one document – the REWIRE project Data Protection Policy. The policy contains statements expressed by all partners, showing their commitment to the adherence to the principles of the GDPR and the protection of the personal data entrusted by the data subjects to the project partners.

### 4.4.2 The REWIRE project Data Protection Policy

***About the REWIRE project***

The Cybersecurity Skills Alliance – New Vision for Europe – REWIRE project develops a Blueprint for the Cybersecurity industry and a concrete European Cybersecurity Skills Strategy. It addresses the skill gaps and shortages in different occupational profiles and qualifications of the Cybersecurity Sector. REWIRE brings together 25 partners from academia and VET, cybersecurity industry, non-cyber industries, certification partners and umbrella organizations in 12 EU countries.
REWIRE is co-funded by the ERASMUS+ programme of the European Union (Agreement Number – 621701-EPP-1-2020-1-LT-EPPKA2-SSA-B) for a duration of four years (01.11.2020 to 31.10.2024).
The Coordinator of the project and organization authorized to communicate on behalf of the consortium in matters related to this website, is MYKOLO ROMERIO UNIVERSITETAS. The relevant Project Manager is Mr. Andrius Bambalas and can be reached at andrius@mruni.eu. The postal address of the MYKOLO ROMERIO UNIVERSITETAS is: MYKOLO ROMERIO UNIVERSITETAS, Ateities st. 20, LT-08303 Vilnius, att. Mr. Andrius Bambalas.

***The objectives of the REWIRE project***

REWIRE addresses the skill gaps and shortages in different occupational profiles and qualifications of the Cybersecurity Sector.
This will be achieved through the following specific objectives:

*Innovation*
- **design** and deliver the European Cybersecurity Blueprint,
- **develop** the European Cybersecurity Skills Framework, update existing and create 4 new occupational profiles,
- **deliver** training programmes on highly innovative fields,
- **develop** a digital on-line publicly accessible Skills Observatory for cybersecurity skills merging the market needs, the profiles, the competencies and the available training courses.

*Impact*
- **involve** all stakeholders for exploiting the VET potential in cutting-edge subjects for creating growth and jobs in the Cybersecurity sector,
- **enhance** the use of cyberranges,
- **promote** the application of EQAVET and EQF/ECVET frameworks that ensure both quality and better transferability of the project's results.

*Sustainability*
- **create** a lasting partnership of all types of stakeholders that will monitor and adjust to changes in the sector's needs,
- **facilitate** transnational mobility between the sectors' stakeholders,
- **provide** transversal skills as well as career guidance, career management skills and access to the labour market, thus improving their long-term employability.

### Personal data processed by the REWIRE project

The REWIRE project in order to effectively fulfil its objectives and comply to the requirements imposed by the legal, regulatory and contractual environment, processes personal data.
The following categories of personal data are processed within the REWIRE project:
- Contact information
- Participation information
- Photos - Videos (from events, meetings and other activities)
- User information and activity
- Employment information
- Communication information
- Identification information
- Training related information
- Trainer's information
- Certification related information
- Publication information
- Cookies

### The role of the REWIRE project in relation to personal data processing

The personal data belonging to the above-mentioned categories, are collected directly from the data subjects during their interaction with the various partners as part of the REWIRE project activities.
Depending on the task and on the purposes of processing, each partner (including the Coordinator) could act as a Controller. The identity of the controller in each case will be clearly depicted in the relevant notification provided to the data subject prior to the personal data collection.

### Personal data sharing

The information provided to the REWIRE project by the data subjects will be stored in the main information system and will be kept in a need-to-know basis.
Access to the data may be provided to authorized personnel of each partner of the REWIRE project, to the European Union (staff relevant to the European Projects ERASMUS+), to the

national authorities of each country (should need arise), to the platform support company and the platform and infrastructure host.

In case it is necessary to share the personal information with others, the data subjects will be duly notified and relevant consent will be requested.

### *Lawfulness, fairness and transparency*

Personal data processed as part of the REWIRE project, will be collected and processed lawfully, fairly and in a transparent manner in relation to the data subject. For each processing, the legal basic will be identified and the relevant actions will be implemented by the controller (project partner leading the relevant activity). Where consent is utilized as the legal basis, this will follow the relevant requirements stated in GDPR as well as the applicable national laws and guidelines.

Processing of personal data that has not been lawfully collected is prohibited.

Processing of personal data that does not fulfil the requirements of the GDPR, the relevant national laws and guidelines and the relevant contractual requirements, is prohibited.

Information about the processing of personal data is provided in the REWIRE website, in the websites of the project partners and in any communication requesting for personal data.

### *Purpose limitation*

Personal data collected by the REWIRE project, will correspond to specified, explicit and legitimate purposes. Processing of personal data in a manner that is incompatible with those purposes is prohibited.

### *Data minimisation*

The REWIRE project will only collect personal data that are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The project partners will examine every case of personal data processing under this specific principle and will minimize the data requested to the minimum possible.

Relevant information will be sent to P6-- APIROPLUS SOLUTIONS LTD, in order to update the relevant record of processing facilities and implement further actions if needed.

### *Accuracy*

At this point, the personal information processed by the REWIRE project, are collected directly from the data subjects.

Due to the limited life-time of the project, it would not be feasible to implement complex processes for keeping the relevant information up to date.

Every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

### *Storage limitation*

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Personal data shall be processed only for defined, specific and relevant to the REWIRE project purposes. The duration of the processing will depend on the specific purpose and in no case will it exceed six (6) years (the duration of the project + 2 years to facilitate the project review).

### *Integrity and confidentiality*

The personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Through the project lifecycle, the project partners will store the project-related personal data in a secured, password-protected repository. For this purpose, a repository has been selected, implemented and is administered by the project Coordinator.

Each project partner has access through selected staff members, to the extend needed by the project. Access to the repository is governed by access control mechanisms.

The Coordinator will manage the access to the repository and will administer or revoke the access to specific individuals and partners as needed. Moreover, the Coordinator will ensure that additional security measures are respected (e.g. regular back-ups).

For the information retained by the individual partners, repositories or other mechanisms shall be used affording an adequate level of security of the data retained (e.g. access control mechanisms, regular backups, etc). The main responsibility regarding security of data collected and processed during the project realization as well as after its completeness lies with the owners/managers/ project partners of the repositories where these data are stored.

Personal data are classified as confidential information. As mentioned in the Grant Agreement, (ARTICLE II.6 — CONFIDENTIALITY), "During implementation of the action and for five years after the payment of the balance, the parties must treat with confidentiality any confidential information and documents."

### *Accountability*

Each project partner shall retain supporting information needed to provide evidence of accountability in relation to the processing of personal data.

### *The rights of the data subjects*

The project partners of the REWIRE project shall accommodate the rights of the data subjects. Specifically, the data subjects have the following rights:

- Right of access by the data subject. The data subject has the right to find out if the partners of the REWIRE project are using or storing personal data related to her/him. The data subject can submit a data subject access request and receive relevant information and if desired a copy of the related data.
- Right to rectification. The data subject has the right to ask the partners of the REWIRE project to correct the related personal data used or stored, in order to reflect the reality at any time.
- Right to erasure ('right to be forgotten'). The data subject has the right to ask the partners of the REWIRE project to delete her/his personal data. The relevant partner is obligated to examine the request and delete the personal data if there is not relevant obligation prohibiting such an action (e.g. legal or contractual requirements). In any

case, the partner shall notify the data subject accordingly and proceed with the erasure when allowed.

- Right to restriction of processing. The data subject has the right to ask the partners of the REWIRE project to stop using her/his personal data. In contrast to the previous data right, the personal data does not need to be deleted but rather either temporarily or completely stop the processing.

- Right to data portability*. The data subject has the right to receive her/his personal data from the partners of the REWIRE project, in order to transfer it to another service provider or request to send the data directly to such other service provider in a way that is machine-readable. (*Only processing operations based on the individual's consent or on a contract to which the individual is party fall under the scope of the right to data portability).

- Right to object and automated individual decision-making**. The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her, including profiling. (**Where personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing). The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.

- Right to withdraw consent***. The data subject has the right to withdraw consent for the processing implemented on her/his personal data. The existence of the right to withdraw consent at any time, does not affect the lawfulness of processing based on consent before its withdrawal. (*** This right is only applicable when explicit consent is used as the legal basis for the processing).

### *Exercising the rights of the data subjects*

At any time, a data subject may submit a relevant request to the following:

a) The DPO of the REWIRE project
   Partner: P6 – APIROPLUS Solutions Ltd.
   Contact details: Ms. Chatzopoulou Argyro, ac@apiroplus.solutions
   Postal address: APIROPLUS Solutions Ltd., Costa Ourani 5, Petoussi Court Floor 5, CY – 3085, Limassol, Cyprus.

b) The Coordinator of the REWIRE project
   Partner: P1 – MYKOLO ROMERIO UNIVERSITETAS
   Contact details: Mr. Andrius Bambalas, andrius@mruni.eu
   Postal address: MYKOLO ROMERIO UNIVERSITETAS, Ateities st. 20, LT-08303 Vilnius, Lithuania

c) The DPO of each partner of the REWIRE project as appropriate to the task and purpose of the processing. The contact details of the various partners are provided by their respective websites.

*Personal data breaches*

All project partners shall implement adequate measures to protect the confidentiality of the processed personal data.

In the case of a personal data breach, the controller (the relevant project partner) shall without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with Article 55, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller shall communicate the personal data breach to the data subject without undue delay.

The controller shall document any personal data breaches, comprising the facts relating to the personal data breach, its effects and the remedial action taken. That documentation shall enable the supervisory authority to verify compliance with Article 33 of the GDPR.

The competent authorities have published forms for the reporting of personal data breaches. Each partner is encouraged to access the relevant location in order to identify the minimum information needed to be documented in the case of a personal data breach.

All project partners should implement appropriate continuity plan to ensure safe continuity of the project activities. In a case of personal data breach, the impact of the incident shall be assessed in order to mitigate adverse effects and prevent any further occurrence. When assessing the significance of the impact of a personal data breach, the parameters such as the number of affected subjects, the extent of impact on the rights and freedoms of the data subjects as well as on project activities, and the duration of the incident shall be taken into account.

A Privacy policy has been created also for REWIRE project website.
The document is provided as reference in Annex B.

## 4.4.3 The DPO

Article 37 introduces the role of the data protection officer.
Specifically, GDPR states that:
*"The controller and the processor shall designate a data protection officer in any case where:*
*(a) the processing is carried out by a public authority or body, except for courts acting in their judicial capacity;*
*(b) the core activities of the controller or the processor consist of processing operations which, by virtue of their nature, their scope and/or their purposes, require regular and systematic monitoring of data subjects on a large scale;*
*or*
*(c) the core activities of the controller or the processor consist of processing on a large scale of special categories of data pursuant to Article 9 and personal data relating to criminal convictions and offences referred to in Article 10."*

Based on the results of the analysis on personal data processing of the REWIRE project (as shown above), the REWIRE project does not fulfil any of the pre-requisites contained in Article 37.

None the less, it is the decision of the Project team, (as early as during the drafting of the proposal) to appoint a Data Protection Officer.

The role of the Data Protection Officer, within the REWIRE project, will consist of the following tasks:

- to cooperate with the Data Protection Officers of the project partners;
- to inform and advise the project partners of their obligations pursuant to this Regulation and to other Union or Member State data protection provisions, for specific shared activities within the REWIRE project;
- to maintain a simple record of the processing activities carried out within the REWIRE project;
- to monitor compliance with the GDPR, to the extent possible;
- to provide advice, along with the DPOs of the project partners, when requested as regards the data protection impact assessment and monitor its performance pursuant to Article 35;
- to cooperate, along with the DPOs of the project partners, with the supervisory authorities;
- to act, along with the DPOs of the project partners, as the contact point for the supervisory authorities on issues relating to processing, including the prior consultation referred to in Article 36, and to consult, where appropriate, with regard to any other matter;
- to publish, review and maintain the Privacy policies and procedures of the REWIRE project;
- to provide awareness training and relevant information to the project partners regarding personal data protection;

The project partner undertaking the DPO role for the REWIRE project, is Partner: P6 – APIROPLUS Solutions Ltd.
**Contact details:** Ms. Chatzopoulou Argyro, ac@apiroplus.solutions
Postal address: APIROPLUS Solutions Ltd., Costa Ourani 5, Petoussi Court Floor 5, CY - 3085-Limassol, Cyprus.

# 5   NEXT STEPS

At month 6 of the REWIRE project, the basic design of the policies and procedures relevant to personal data protection has been concluded.

Based on the methodology employed, (Section 3. METHODOLOGY), the next steps to be implemented are (Grey denotes the tasks already implemented):

| | |
|---|---|
| PLAN | 1. Analyse existing regulatory and legal environment in relation to personal data protection within the context of the REWIRE project. <br> 2. Collect an initial estimation of personal data that will be processed by the project partners as part of their activities within the REWIRE project. <br> 3. Analyze the received information on processed personal data, analyze the relevant risks to the rights and freedoms of the data subjects. <br> 4. Design a general policy to be adopted by all partners of the REWIRE project in relation to the processing of personal data and assign a Data Protection Officer for the REWIRE project. <br> 5. Design relevant additional procedures. |
| DO | 1. Implement the privacy policy. <br> 2. Implement relevant additional procedures. <br> 3. Provide awareness training to the partners of the REWIRE project regarding the processing of personal data. <br> 4. Respond to requests as needed. <br> 5. Regularly update the information in collaboration with the project partners, in relation to processed personal data and plan actions if needed. |
| CHECK | 1. Review the correct operation, application and effectiveness of the implemented processes. |
| ACT | 1. Implement corrective actions where needed. <br> 2. Update relevant documentation and practice. |

***Table 5.*** *Personal Data Management actions*

The relevant procedures, documents and files will be updated during the lifetime of the project. The files will be stored in the REWIRE project repository.

# 6   LIST OF TABLES

# 7 ANNEXES

## ANNEX A. An example of the Collection file

| Partner Name: | APIROPLUS Solutions Ltd. | | (Partner organization name) |
|---|---|---|---|
| Contact point for Data: | xxxxxxxx | | (Name & Surname) |
| Communication email: | xxxxxxxx | | (email) |

**Description of the Tasks where the partner will be involved in:**

APIROPLUS Solutions Ltd, is the Leader of T1.3 Open Data Management and Data Protection, T3.5. Cybersecurity carreer pathway analysis, T4.6. Design of Certification Schemes for selected Occupational Profiles.
APIROPLUS Solutions Ltd, will contributing to T1.1 Managing work plan activities, T1.2 Coordination and communication, T3.4 Mapping the framework to existing courses and schemes.
APIROPLUS Solutions Ltd, will also participate in all other Tasks of the project and assist all project partners where needed.

**Introduction**

**Personal Data** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. Put simply, personal data is anything that can provide information on the life, preferencies and details of a specific (identifiable) person. (e.g. Apostolos Karras lives at xxxxxxxxxxx address). There are several categories of personal data, as indicated by the definition. A list is presented in **Column H**.
**Non-personal Data** 'data' means data other than personal data. For example the data collected from a temperature sensor (date, time and temperature) are non personal data. On the other hand, if this information is the temperature of a specific identifiable person, then the same data set (with the addition of the Name / Surname or any other identifier) becomes a non personal data set. The identification of non personal data is needed for two reasons: a. The validation of the correctness of the type of data and b. as input for the Open data procedures and guidelines of the project.

| Type of Data | Description of Data (Please provide a description of the **categories** of the data that you expect to process) | Purpose of processing / Why do we need this data | Task under which the data will be processed / generated / processed | Source of the Data (from where have we collected the information) | Is the information or the output proprietary? |
|---|---|---|---|---|---|
| Personal | **Contact Data** of the different partners of the REWIRE project | To facilitate the communication and the operation of the project | All tasks | The project coordinator and the project platform | No |
| Not personal | Information on job profiles, their competencies, knowledge, abilities and skills. Information of the correlation between the different profiles. | To implement the Cybersecurity carreer pathway | T3.5 | Public resources and standards | No |
| Not personal | Certification schemes | To impelent the various certification schemes | T4.6. | Public resources, standards, input from other partners | No |
| Personal | Personal data regarding **performance** (from the certification exams), the **identification** information of the candidates, any information required as **prerequisite** within the certification schemes (e.g. education, experience etc), the data and time of the exam, the location of the exams | To impelent the various certification schemes | T4.6. | The data subject directly | No |
| Not personal | Information on existing courses and certification schemes. Information on the correlation between the existing courses and the schemes. | To provide input for the carrer path and the cyberability platfrom | T3.4 | Public resources and standards | No |
| Personal | **Contact** Data - Emails | To facilitate the communication and the operation of the project | All tasks | The different partners and other parties | No |
| Personal | **Identification** and **contact** information of various stakeholders | To share the outcomes of the project, to communicate the information of the project etc. | T7.1, T7.2, T7.3 | From existing contacts with the relevant parties | No |

**ANNEX B. The REWIRE website privacy policy**

The following information provides a simple overview of what happens to your personal data when you visit our website. Personal data are all data with which you can be personally identified. Information on data protection can be found in our detailed data protection declaration below this text.

Through this document, we would like to provide you with information regarding:

*About us and our role regarding your personal information*

The Cybersecurity Skills Alliance – New Vision for Europe – REWIRE project develops a Blueprint for the Cybersecurity industry and a concrete European Cybersecurity Skills Strategy. It addresses the skill gaps and shortages in different occupational profiles and qualifications of the Cybersecurity Sector. REWIRE brings together 25 partners from academia and VET, cybersecurity industry, non-cyber industries, certification partners and umbrella organizations in 12 EU countries.

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The Coordinator of the project and organization authorized to communicate on behalf of the consortium in matters related to this website, is MYKOLO ROMERIO UNIVERSITETAS. The relevant Project Manager is Mr. Andrius Bambalas and can be reached at andrius@mruni.eu.

The postal address of the MYKOLO ROMERIO UNIVERSITETAS is: MYKOLO ROMERIO UNIVERSITETAS, Ateities st. 20, LT-08303 Vilnius, att. Mr. Andrius Bambalas.

The REWIRE project, as the operator of this website, is acting as a controller regarding the personal information you are providing through this web site. We take the protection of your personal data very seriously. We always treat your personal data confidentially and in accordance with the data protection regulations and this data protection declaration.

When you use this website, various personal data are collected. Personal data is data with which you can be personally identified. This Privacy Policy explains what data we collect and what we use it for. It also explains how and for what purpose this is done.

Personal data collected through this website, is processed in accordance with the General Data Protection Regulation (EU) 2016/679), the Law on the Legal Protection of Personal Data of the Republic of Lithuania, and other national legal acts and internal procedures.

Personal data means any information relating to a natural person ('data subject') who can be identified, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This information could be a name and last name of a person, an email address etc.

*Which personal information we process*

A. If you only use our website for information purposes (i.e. access and viewing – not registering in any functions or events), certain information is automatically sent to the server by which the website is kept available by the internet browser used on your device. This information is technically necessary for us to display our website to you and to ensure the stability and security of the connection and the system. Under no circumstances do we use the aforementioned data for the purpose of drawing conclusions about you personally.

B. **Cookies** are stored on your device when you use our website, only if they are selected.

Cookies – are small files, that a browser receives on the user's device (computer, phone or tablet) from a website that the user visits and is stored on the user's device. Cookies are used to improve functionality, for advertising, statistics and analysis (used to distinguish between the visitor and the workplace, to provide more relevant content, to collection information by analyzing website traffic, collecting statistics). In other words, cookies allow a website to remember information about a user's browsing habits, actions and setting.

In this specific website only the following cookies are used:

| NECESSARY COOKIES: Necessary cookies are absolutely essential for the website to function properly. This category only includes cookies that ensures basic functionalities and security features of the website. These cookies do not store any personal information. | | |
|---|---|---|
| **Name** | **Description** | **Expiry** |
| cookielawinfo-checkbox-analytics | This cookie is set by GDPR Cookie Consent WordPress Plugin. The cookie is used to remember the user consent for the cookies under the category "Analytics". | 1 year |
| cookielawinfo-checkbox-necessary | This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Necessary". | 1 year |
| cookielawinfo-checkbox-non-necessary | This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Non-necessary". | 1 year |
| cookielawinfo-checkbox-performance | This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Performance". | 1 year |

**ANALYTICAL COOKIES:** Analytical cookies are used to understand how visitors interact with the website. These cookies help provide information on metrics the number of visitors, bounce rate, traffic source, etc.

| Name | Description | Expiry |
|------|-------------|--------|
| _ga | Registers a unique ID that is used to generate statistical data on how the visitor uses the website. | 2 years |
| _ga_# | Used by Google Analytics to collect data on the number of times a user has visited the web site as well as dates for the first and most recent visit. | 2 years |

C. Your **e-mail** if you submit it through the Sign-Up function displayed at the bottom of each page. This e-mail address is used only in order to send you updates on the REWIRE project, the REWIRE partners and relevant information regarding opportunities or actions deriving from the project and the project partners.

D. Our website provides access, through the links displayed at the bottom of each page to the online presence of the REWIRE project in social media (LinkedIn, Facebook, YouTube). We do not retain any information on this action.

*Why we process your personal information*

We process your personal information provided to us as mentioned above for the following reasons:

A. **Information regarding your visit to the website.** This information is technically necessary for us to display our website to you and to ensure the stability and security of the connection and the system.

B. **Cookies** are stored on your device when you use our website, based on your choices. More information can be found above. Depending on the choices you make during the relevant cookie function consent, the use of the cookies are: mandatory for the correct operation of the website and your visit and advertising, or analytics. You can find out more about the use of cookies on our website [www.rewireproject.eu](www.rewireproject.eu)

C. Your **e-mail** if you submit it through the Sign-Up function displayed at the bottom of each page in order to send you updates on the REWIRE project, the REWIRE partners and relevant information regarding opportunities or actions deriving from the project and the project partners.

D. We manage our social media ourselves. If you send us a private or direct message via social media, it will not be shared with any other organization. We review all this information and decide how to manage it. For example, if you send a message via social media that needs a response from us, we may process it as an enquiry or a complaint. When contacting us through a social media platform, we suggest you also familiarise yourself with the privacy information of that platform.

*How long we will store your personal information*

We will store the information provided under A, B, C and D, based on our quality procedures for no more than four (4) years (the duration of the project).

*Which are the possible recipients of your personal information*

The information provided to us by you will be stored in the main information system and will be kept in a need-to-know basis.

Access to the data may be provided to authorized personnel of each partner of the REWIRE project, to the European Union (staff relevant to the European Projects ERASMUS+), to the national authorities of each country (should need arise), to mailchimp (that manages the mail campaigns), to the website administrator, to the platform support company and the platform and infrastructure host.

In case it is necessary for your information to be shared with others, we will inform you accordingly.

*To which countries or international organizations we intent to transfer your information*

The countries that will receive your personal information are:
Austria, Belgium, Cyprus, the Czech Republic, Estonia, France, Greece, Hungary, Lithuania, Serbia, Spain, Sweden.

*How we will process your personal information*

We will collect, record, structure, store, consult, use, disseminate or otherwise make available, restrict, erase or destruct the personal data acquired by you through our website based on the above-mentioned principles while serving the specific processing purposes.
We will not use your information for profiling or for automated decision-making.

*Which are your rights regarding your personal information processed by us*

You have the right to request access to and rectification or erasure of the personal data retained or the restriction of processing concerning you or to object to processing as well as the right to data portability.
You have the right to withdraw consent at any time, simply by:
- clicking on the "Unsubscribe" link on the received newsletter and/or
- by sending an e-mail to info@rewireproject.eu with the title "WITHDRAW CONSENT".

The legality of the data processing carried out before the revocation remains unaffected by the revocation.
You have the right to lodge a complaint with a supervisory authority.
The responsible supervisory authority for data protection issues is the Lithuanian State Data Protection Inspectorate, which you can contact at the following link: https://vdai.lrv.lt/en/
More contact information:
Address: L. Sapiegos str. 17 (Left-hand entrance), LT-10312 Vilnius
Phones: +370 5 271 2804 / 279 1445, Fax +370 261 9494
E-mail ada@ada.lt
Consultations by phone: +370 5 212 7532
Monday–Thursday 9–11 AM and 1–3 PM (EET)

*How you can exercise your rights regarding your personal information processed by us*

You can contact us any time:
- through the post at the postal address of the project coordinator:

MYKOLO ROMERIO UNIVERSITETAS, Ateities st. 20, LT-08303 Vilnius, att. Mr. Andrius Bambalas
- through e-mail to the project manager, is Mr. Andrius Bambalas at andrius@mruni.eu.

*Other information*

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit.
We keep our privacy policy under regular review to make sure it is up to date and accurate.
March 2021