

Privacy Statement regarding the protection of personal data in the context of the “Pharos CY AI Factory Project” events

“PHAROS CY: The Cyprus AI Factory Antenna” is the national hub for AI research, development, and application. PHAROS CY is positioned as a strategic pillar in Cyprus' and EU's journey towards AI democratisation, sustainability and innovation. Pharos aims to create a trusted, sustainable AI ecosystem in Cyprus that bridges the gap between academia, industry and the public sector, by promoting ethical AI innovation, focusing on critical sectors, such as Health, Culture & Language and Sustainability.

Partners/Joint Controllers (hereinafter referred to as “the Consortium”):

- * Cyprus Research and Academic Network (CYNET)
- * The Cyprus Institute (CYI)
- * The Cyprus Institute of Neurology and Genetics (CING)
- * KIOS Research and Innovation Center of Excellence (KIOS)
- * Centre of Excellence in Interactive Media (CYENS)

*Center of Excellence in Biobanking and Biomedical Research (Biobank)

*Cyprus Marine and Maritime Institute (CMMI)

*Cyprus University of Technology (CUT)

*Eratosthenes Centre of Excellence (ERATOSTHENES CoE)

*Phaethon Centre of Excellence (PHAETHON CoE)

*University of Cyprus (UCY)

Data Controller details:

Cyprus Research and Academic Network (CYNET) on behalf of “the Consortium”

Data Controller’s Contact Details:

CYNET’s Data Privacy Email Contact – liaison@cynet.ac.cy

Data Processor:

« CYNET »

More detailed information for each application from the other, the Terms of Use and Protection of the required applications in its application: <https://cynet.ac.cy/privacy-policy/>

Scope of this Privacy Statement:

Cyprus Research and Academic Network (hereinafter referred to as “CYNET”) acting on behalf of “the Consortium” is bound by the European Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation – hereinafter referred to as “the GDPR”) and Law 4624/2019 (Government Gazette 137/A/2019) on “Data Protection Authority, measures for the implementation of Regulation(EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and for the incorporation into national law of Directive(EU) 2016/680 of the European Parliament and of the Council of 27 April 2016 and other provisions”, as in force at any time (hereinafter referred to as “the Law”). This Privacy Statement details all information necessary for the processing of personal data for “Pharos CY AI Factory Project” events. This Privacy Statement sets out the criteria as well as the terms and conditions under which CYNET acting on behalf of “the Consortium” collects, processes, uses, stores and transmits the personal data of those who subscribe to “Pharos CY AI Factory Project” events, how it ensures the confidentiality of such information, including any law and/or regulation implemented or enacted in accordance with Union and national laws on personal data protection and electronic privacy, as well as any law and/or regulation amending, replacing, issuing or consolidating any of the latter, including any other applicable Union and national laws on the processing of personal data and privacy, which may exist in accordance with applicable law.

For the purposes of this Privacy Statement, the terms “data processor”, “data controller”, “third party”, “supervising authority”, “personal data”, “processing”, “data subject” shall have the meaning ascribed to them by applicable legislation on the protection of personal data.

In addition, for the purposes of the present, the following definitions shall also apply:

“Website” – the website accessible via domain names <https://pharos-cy.eu/>, including the entirety of the web pages thereof.

“Participant” – the “Pharos AI Factory Project” events participant, whom the data refer to, whose identity is known or may be verified, namely it may be directly or indirectly determined.

A. Purpose/s for processing the data collected:

CYNET acting on behalf of “the Consortium” within the framework of organizing the “Pharos CY AI Factory Project” events collects and processes the personal data of those who give their consent for participating in the “Pharos CY AI Factory Project” events, for the following purpose / purposes:

- To register for the “Pharos CY AI Factory Project” events.
- B. For communication purposes in the context of the events.
CYNET will contact via email the participants for

evaluation/feedback purposes and/or for future events suggestions.

- C. For technical support.
- D. For promoting the “Pharos CY AI Factory Project” events, personal data of the participants (Photos, videos, livestreaming) will be used and be published on the following social media:
 - “Pharos CY AI Factory Project”/Consortium Partners channels:
 - LinkedIn
(<https://www.linkedin.com/company/pharosaiactory/>)
 - CYNET channels:
 - LinkedIn
(<https://www.linkedin.com/company/cynet1/>),
- E. For the implementation of sending the invitations of registering for the events and the technical support of the project by the data processor “Cyprus Research and Academic Network”.

B. Categories of personal data processed:

In the context of registering for the “Pharos CY AI Factory Project” events, the personal data that are being processed are:

- For the purpose A: to register for the “Pharos CY AI Factory Project” events:
 - Full Name
 - Email address
 - Company/Organization/Institution
 - Country of Organisation

- Timestamp of the consent
- For the purposes B and C: For communication purposes in the context of the events and the technical support, the personal data being processed are:
 - Full Name
 - Email address
 - Company/Organization/Institution
- For the purpose D: For promoting the “Pharos CY AI Factory Project” events:
 - Photos
 - Videos
 - Livestreaming
 - Recording
- For the purpose E: For the implementation of sending the invitations of registering for the events and the technical support of the project by the data processor “Cyprus Research and Academic Network”:
 - Email
 - Full Name

CYNET acting on behalf of “the Consortium” collects and processes the aforementioned data solely for the purposes mentioned above and only to the extent strictly necessary to effectively serve such purposes. These data shall be relevant, appropriate and not more than those required in view of the aforementioned purposes. They shall also be accurate and, if necessary, updated.

Furthermore, the aforementioned data shall be retained only during the period required as mentioned hereinabove, in order to

accomplish the purposes of their collection and processing and shall be deleted after the end thereof (see below “Retention period of personal data”).

C. Legal bases for processing

The processing of participants personal data is based on their consent, as required by Article 6 par. 1 para a’ GDPR.

It should be mentioned that when registering for “Pharos CY AI Factory Project”, data subjects may give their consent for each processing purpose separately.

In particular, with regard to the processing of personal data for archiving purposes, the legal basis of the overriding legitimate interest of CYNET/”the Consortium”/“Pharos CY Legal Entity” applies (Art. 6 para f’ GDPR). This aims to creating and maintaining the company's/consortium’s/entity’s historical archive and historical identity.

D. Access to personal data:

For the implementation of sending invitations for the “Pharos CY AI Factory Project” events access to the personal data of the participants is provided to the following:

- To the “Pharos CY AI Factory Project” management team of CYNET, which consists of staff that maintains a contractual relationship of project leasing and provision of services with CYNET. “Associates of CYNET”, who are bound by a private confidentiality agreement with CYNET
- To CYNET company for technical support purposes.

E. Recipients of collected personal data:

CYNET acting on behalf of “the Consortium” shall in no way transmit or in any way disclose the collected personal data to any third-party entities, private businesses, natural persons or legal entities, public authorities, agencies or other organizations, other than as expressly set out herein.

The collected personal data may be disclosed or transmitted to governmental authorities and/or law enforcement officials, only if necessary for the abovementioned purposes, in the context of enforcement of a court decision or a provision of law or if necessary to secure the legitimate interests of CYNET in compliance with the terms and conditions of applicable law.

The collected data will be also disclosed to and used (according to the current Privacy Statement) by the “Pharos CY Legal Entity” when officially formed.

F. Rights of data subject:

As regards the data processed in the context of registering for the “Pharos CY AI Factory Project” events, CYNET acting on behalf of “the Consortium” takes all necessary action, pursuant to the terms of this Privacy Statement, both during the collection as well as in every subsequent stage of processing those data, so that every participant may exercise his/her rights, as laid out in applicable legislation on the protection of personal data, as detailed hereinbelow and in accordance with the terms and conditions of applicable law:

- **Right of Access:** The data subject is entitled to request and obtain from CYNET acting on behalf of “the Consortium”, a confirmation on whether or not his/her personal data are processed and, if so, to exercise the right to access such personal data pursuant to applicable legislation. The data subject may also request a copy of the personal data undergoing processing, as described in this Privacy Statement. Finally, it should be noted that the right to obtain a copy of the personal data undergoing processing shall not adversely affect the rights and freedoms of others in accordance with applicable law.
- **Right of Rectification:** The data subject shall have the right to request from CYNET acting on behalf of “the Consortium” to rectify any inaccurate personal data concerning him/her. Considering the purposes of the processing, the data subject shall have the right to request that any incomplete personal data be completed, including by means of providing a supplementary statement, in accordance with applicable legislation.
- **Right of Erasure:** The data subject has the right to delete all his / her personal data that have been collected and processed in accordance with the terms of the current legislation and the terms of this.
- **Right to restriction of processing:** The data subject is entitled to ensure that CYNET acting on behalf of “the Consortium” restricts the processing of his/her data, if any of the conditions laid down by applicable legislation on the protection of personal data, is met.
- **Right to data portability:** The data subject has the right to obtain any personal data concerning him/her, which he/she

has provided in a structured, commonly used and machine-readable format, as well as the right to transmit such data to another entity without any objection from the processor to which the personal data have been provided, in accordance with the provisions of the applicable legislation on personal data.

- **Withdrawal of consent:** In addition, data subjects have the right, at any time, to withdraw their consent, without this withdrawal affecting the lawfulness of the processing that took place prior to its withdrawal.

For example, in the event that a subject has given their consent for the collection and (re)publication of photographic/video material and this material is published/posted on the social media as described on this document, in case withdraw their consent, then CYNET acting on behalf of “the Consortium” will not (re)publish any new posts of the photographic/video material in question;

However, it should be noted that in this case, regardless of the intentions of CYNET/”the Consortium”/”Pharos CY Legal Entity”, CYNET will not be able to control any republications of the material in question by third parties or the retention of the material in question on social media.

It is also clarified that any withdrawal of consent by the data subject does not affect the right of CYNET/”the Consortium”/”Pharos CY Legal Entity” -as mentioned above- on the legal basis of its legitimate interest, to retain the relevant photographic/video material for archival purposes and to preserve their historical identity.

To exercise any of the above rights, the participant may contact the “Pharos CY AI Factory Project” at the following email address: info@pharos-cy.eu

The aforementioned rights of the data subjects are subject to restrictions in accordance with the applicable legislation.

G. Personal data retention periods

The personal data collected and processed in the context of registering for the “Pharos CY AI Factory Project” events, based on the consent of the data subjects, will be retained until the withdrawal of their consent or until the request for deletion is exercised. At any time, the withdrawal of consent will be possible here by completing the forms [here](#) and [here](#).

It is mentioned that in this case, the legitimacy of the processing of personal data that took place in the context of the given previous consent is not affected.

In any case, the retention period, shall not exceed the period of two (2) after the completion of the “Pharos CY AI Factory Project”.

Photographic/video material that may be kept by CYNET/”the Consortium”/ “Pharos CY Legal Entity” for archival purposes and to preserve their historical identity is kept without time limitation, without further processing.

Finally, photographic/video material posted social media is kept online, in accordance with the data retention rules of those social media.

H. Security measures:

The processing of personal data is carried out in such a way as to ensure its confidentiality and security. Specifically, it is carried out exclusively by authorized associates, while all appropriate organizational and technical measures are taken for data security and protection against accidental or unlawful destruction, accidental loss, alteration, prohibited dissemination or access and any other form of unfair treatment.

For more information visit the website:

<https://cynet.ac.cy/privacy-policy/>

J. Contact:

For any questions or clarifications regarding the present Privacy Statement and as well as in the event of any violation related to personal data issues, participants may contact the Data Privacy Department of CYNET at the e-mail address liaison@cynet.ac.cy

K. Recourse/Complaint

In case a request is not satisfied by “the Consortium” the participant may at any time address to/ file recourse with the Competent Supervisory Authority, namely the Digital Security Authority at <https://dsa.cy/>