# Privacy Policy

**eduTEAMS Privacy Policy, Version 1.0,**

October 8, 2018

<table>
<thead>
<tr>
<th>Name of the service</th>
<th>eduTEAMS</th>
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<tbody>
<tr>
<td>Description of the service</td>
<td>The eduTEAMS service is a technical solution assisting virtual organisations in Research and Education to register and manage virtual organizations, users, groups, roles and rights. This information can be used also to allow user access to additional external services provided by or for the virtual organization. Creating and/or joining a virtual organisation is voluntary. The eduTEAMS service is enabling the data subjects (researchers, scientists - users) to participate in virtual organizations as well as accessing to the above-mentioned external services based on the membership with the virtual organization. This privacy notice describes how we process the personal data of you – user – when you use eduTEAMS.</td>
</tr>
<tr>
<td>Data controller and a contact person</td>
<td>GÉANT VERENIGING (Association) – registered with the Chamber of Commerce in Amsterdam with registration number 40535155 with its registered address at Hoekenrode 3, 1102 BR, Amsterdam, The Netherlands (hereinafter referred to as: “we” or “GÉANT”) is the data controller. GÉANT has appointed Data Protection Officer, who can be contacted at: <a href="mailto:gdpr@geant.org">gdpr@geant.org</a> Additionally, the eduTEAMS service support can be contacted at: <a href="mailto:support@eduteams.org">support@eduteams.org</a></td>
</tr>
<tr>
<td>Jurisdiction</td>
<td>NL, The Netherlands</td>
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</tbody>
</table>
As part of your registration into a virtual organisation, the eduTEAMS service may register the following data:

### A) Profile information
- Honorific
- Given Name
- Middle Name
- Family Name
- Suffix
- Email
- Telephone number
- Postal addresses
- Language Preference
- Affiliation
- Username
- SSH public key(s)

### B) Information for your virtual organisation
- The virtual organisation that you have created or joined
- Group and memberships you may have in the context of your virtual organisation
- Roles and rights you may have in the context of your virtual organisation

### C) External Identity Provider Institution information
For authentication to the eduTEAMS platform we may request from your home institution or another identity provider of your choice:
- Given Name
- Middle Name
- Family Name
- Email
- Affiliation

### D) Identifiers
- Identifiers, as provided by identity providers like e.g. a Home Institution or
- Identifiers from third parties, for example an ORCID

All of the above information is provided by you on a voluntary basis, or in case of the information from your institution upon your choice. You may choose not to provide certain information, but this may mean you cannot participate in the virtual organisation. The actual data collected by your virtual organisation may differ. You can consult this at any time by visiting the [User profile Page].

Additionally, during your activity on eduTEAMS we keep technical log consisting of the following data:
- Your actions on the platform along with timestamps
- External services that you accessed through eduTEAMS
- Your IP address
- The Identity Provider you used

### Purpose of the processing of personal data
The eduTEAMS service processes your personal data to identify, authenticate and authorize you as a member of one or more virtual organisations who have chosen to use the eduTEAMS service to register and manage their members. Based on the information provided you may gain access to external services that are available in the context of your virtual organisation.

Technical log files produced by the eduTEAMS service components will be used only for administrative, operational, accounting, monitoring and security purposes.

### Legal basis of processing
The legal basis for processing your personal data is the GÉANT legitimate interest consisting of providing to the users – members of research and education community – technical solution enabling them to participate in virtual teams (based on voluntary decision of each user) as well as access by the user to external services based on their membership with the virtual team as well as administrative and security maintenance of the eduTEAMS service, what is not overridden by the interests or fundamental rights and freedoms of the user (data subject).

### Recipients
The eduTEAMS service may reveal your personal data to other members of the virtual organization you have chosen to join. By joining a virtual organisation that is using eduTEAMS, you agree that the recorded information may be disclosed to other authorized participants of the virtual organisation via secured mechanisms, but only for the same purposes and only as far as necessary to provide the services.

The eduTEAMS service will release your personal data to services available to the virtual organisation you choose to become a member of. Data release will be done via secured mechanisms and according to the sections 2.f and 2.l of the Data Protection Code of Conduct [Code of Conduct].

The current listing of associated services for your virtual organisation which are enabled to receive personal data is available at the [User profile Page]. Statistical data is gathered based on the technical logs. This data is anonymized and does not contain any personal data. Statistical data may be made publicly available by eduTEAMS.
### Data storage

All data processed by the eduTEAMS service is stored within the EU/EEA.

The services are operated under the jurisdiction of the Data Controller

External services that you choose to join may receive your personal data – those maybe based in the EU/EEA, or in countries with less adequate data protection provisions.

### Data retention

Your personal data associated with your account is kept as long as you are active in the eduTEAMS service and can be deactivated earlier on request - in case that you have not logged in to eduTEAMS for 12 consecutive months your account will be deactivated.

The technical logs and related information are kept independently in order to guarantee the security of the infrastructure and its optimization and we be retained no longer than 18 months.

### Security

GÉANT takes the confidentiality, integrity and availability of your personal data very seriously. We take appropriate security precautions to protect your personal data from loss, misuse and unauthorised access, disclosure, alteration and destruction. In particular: access to technical log data is restricted and can only be accessed in a secure way by the eduTEAMS service staff.

When accessing a service provided we will have adequate security controls in place to keep your personal data safe in accordance with the classification of the personal data we have collected from you.

Although we endeavour to ensure your personal data remains secure, there is no absolute guarantee of security when using services online. While we strive to protect your personal data, you acknowledge that:

- There are security and privacy limitations on the internet which are beyond our control and what can have negative impact on the confidentiality, integrity and availability of the information.
- We cannot be held accountable for activity that results from your own neglect to safeguard the security of your log on credentials and equipment which results in a loss of your personal data. If you feel this not enough, then please do not provide any personal data.

### Your Rights

- To access your data, go to the [User profile Page]. You may access and rectify your personal data or deactivate your account by visiting the [User profile Page]. If you have any additional questions connected with your data protection rights contact support@eduteams.org.

To access, rectify the data released by your Home Organisation (e.g. your university or research institute), contact your Home Organisation's IT helpdesk. You may object to processing of your personal data by deactivating your account in the eduTEAMS service at any time by sending email to support@eduteams.org.

Moreover, you have the right to file a complaint to the Dutch Data Protection Authority [Autoriteit Persoonsgegevens]

Your personal data will be protected according to the Code of Conduct for Service Providers [Code of Conduct], a common standard for the research and higher education sector to protect your privacy.

### References

  https://mms.demo.eduteams.org/fed-sb/profile/ (For users using the demonstration platform)
- [Autoriteit Persoonsgegevens] - https://autoriteitpersoonsgegevens.nl

### Contact

Please contact our support desk at support@eduteams.org for any further information.