Privacy Notice on the Protection of Personal Data in the Context of the User Consultation Process under the 5G-HUB Project

Introduction

This Privacy Notice explains how personal data are collected, processed and protected in the context of the user consultation activities carried out under the **5G-HUB Project**.

All personal data are processed in accordance with **Regulation (EU) 2018/1725** and, where applicable, **Regulation (EU) 2016/679 (GDPR)**, ensuring a high level of protection of the rights and freedoms of individuals.

Purpose of the Processing

The personal data collected through the consultation process are processed solely for the following purposes:

- Managing and administering participation in the user consultation activities conducted within the 5G-HUB Project;
- Collecting and analysing stakeholders' views, needs and feedback;
- Preparing reports, statistics and aggregated analyses supporting project activities and outcomes;
- Responding to requests for information related to the consultation process;
- Supporting communication and dissemination activities related to the project;
- Ensuring the proper implementation, monitoring and evaluation of the project.

Personal data will not be used for automated decision-making or profiling.

Categories of Personal Data Processed

Depending on the consultation activities, the following categories of personal data may be processed:

- Identification data (e.g. name and surname);
- Contact details (e.g. email address, organisation);
- Professional information (e.g. job title, sector of activity);
- Responses provided through questionnaires, surveys, interviews or consultation forms;
- Any additional information voluntarily provided by the participant.
- Technical and usage data automatically generated by the online survey platform (e.g. the date and time of submission and, where applicable, connection metadata).

Legal Basis for Processing

The processing of personal data is based on:

- The data subject's consent pursuant to Article 5(1)(d) of Regulation (EU) 2018/1725 and/or Article 6(1)(a) GDPR;
- The necessity to perform tasks carried out in the public interest and related to the implementation of the 5G-HUB Project;
- Compliance with legal and contractual obligations connected with the management of EU-funded projects.

Recipients of the Data

Personal data may be accessed only by authorised personnel involved in the implementation, management, monitoring and evaluation of the 5G-HUB Project.

Where necessary, personal data may be shared with:

- Project partners participating in the 5G-HUB consortium;
- The European Commission and/or the relevant funding authority;
- Auditors, monitoring bodies and control authorities entitled to verify project activities.
- The provider of the online survey platform used to collect the responses — Google Ireland Limited ("Google Forms") — acting as data processor on behalf of the Data Controller under a data processing agreement concluded pursuant to Article 28 GDPR.

Personal data will not be disclosed to unauthorised third parties.

This questionnaire is addressed to entities operating within European Union Member States. Responses are collected through Google Forms, a service provided by Google Ireland Limited

(with Google LLC, United States, acting as sub-processor). As a consequence, personal data may be processed both within the European Economic Area and, to the extent strictly necessary for the provision, support and maintenance of the service, in third countries — in particular the United States — subject to the safeguards described in the "International Data Transfers" section below.

Survey Platform and Data Processor

The user-consultation responses are collected through Google Forms, an online survey tool provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). In this context, Google acts as a data processor and processes personal data solely on documented instructions from the Data Controller, on the basis of the Google Workspace / Cloud Data Processing Addendum concluded pursuant to Article 28 GDPR.

In addition to the answers provided by respondents, the platform may automatically process limited technical and usage data necessary to operate and secure the service. The form is configured so that respondents are not required to sign in with a Google account, and no data is collected beyond what is necessary for the consultation.

Further information on how Google processes personal data is available in the Google Privacy Policy (https://policies.google.com/privacy) and in the applicable Google Workspace / Cloud data processing terms (https://cloud.google.com/terms/data-processing-addendum).

International Data Transfers

Because the survey platform is operated by a provider belonging to a group with infrastructure located outside the European Economic Area (EEA), personal data collected through the questionnaire may be transferred to, or accessed from, third countries, in particular the United States.

Any such transfer takes place only where an adequate level of protection is ensured. In particular, transfers to the United States are covered by the European Commission's adequacy decision of 10 July 2023 on the EU–U.S. Data Privacy Framework, to the extent the provider is certified under that Framework, and/or by the Standard Contractual Clauses adopted by the European Commission pursuant to Article 46 GDPR, complemented by appropriate supplementary measures. A copy of, or information on, the relevant safeguards may be obtained by contacting the Data Controller at the address indicated in the "Contact Information" section.

Data Retention

The personal data will be retained for the entire duration of the 5G-HUB Project and for five years following its official completion, solely for audit and reporting purposes as required by the European Commission.

At the end of the retention period, the data will be securely deleted or anonymised.

Data Security

Appropriate technical and organisational measures are implemented to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

Only authorised persons with a legitimate need-to-know may access personal data.

Where personal data are collected through the online survey platform, the platform provider also applies its own technical and organisational security measures, including encryption of data in transit and at rest and internationally recognised security certifications (for example ISO/IEC 27001 and ISO/IEC 27701).

Rights of Data Subjects

Data subjects have the right:

- To obtain confirmation as to whether their personal data are being processed and, where that is the case, to access the data and receive detailed information on the processing;
- To request the rectification of inaccurate or incomplete personal data;
- To request the erasure of personal data where the applicable legal conditions are met;
- To request the restriction of processing where the applicable legal conditions are met;
- To exercise their right to data portability, enabling them to receive and reuse their personal data across different services;
- To withdraw their consent at any time, without affecting the lawfulness of processing carried out prior to the withdrawal of consent;
- To object to the processing of their personal data, where provided for by applicable legislation;
- To lodge a complaint with the competent supervisory authority if they consider that the processing of their personal data infringes the applicable data protection

legislation. In particular, with regard to personal data processed by the University of Siena (UNISI), data subjects have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la protezione dei dati personali), pursuant to Article 77 of Regulation (EU) 2016/679. Complaints may be submitted in accordance with the procedures and through the contact channels indicated on the Authority's official website (www.garanteprivacy.it).

Contact Information

For any questions regarding this Privacy Notice or the processing of personal data within the 5G-HUB Project, data subjects may contact:

Data Controller:
University of Siena – Department of Information engineering and mathematics
Via Roma, 56 - Siena
Email: rpd@unisi.it

Data Protection Officer (RPD/DPO):
University of Siena – Data Protection Officer
Email: rpd@unisi.it — PEC: rpd@pec.unisipec.it

Project data protection contact (5G-HUB consortium):
Email: cordeiro@onesource.pt

Consent Statement

By participating in the consultation process and submitting personal data, participants acknowledge that they have read and understood this Privacy Notice and, where required, consent to the processing of their personal data for the purposes described herein.