

## Privacy Policy of the EU CyberNet Expert Pool

1. By joining the EU CyberNet Expert Pool and providing us with your personal data (hereinafter *data*), you as an expert, are giving your consent to EU CyberNet to process the data. EU CyberNet project is implemented by Estonian Information System Authority (RIA) who acts as a data controller. This Privacy Policy is meant to help you understand what data we collect, why we do it and how your data is protected, as well as, how to update, manage and delete your data.

### INTRODUCTION

2. EU CyberNet is set to achieve four major deliverables over a period of four years: building a network of cybersecurity experts and stakeholders, developing a technical platform, providing training and assistance and becoming a knowledge hub of EU's external cyber engagements.
3. EU CyberNet Expert Pool is a core element of the project that establishes a virtual database of cybersecurity experts and constitutes the primary source for identifying experts who can contribute to EU's cyber capacity building activities.
4. Experts' inclusion in the Expert Pool is on a voluntary basis and becomes effective by completing the online Expert Profile Form and after confirmation by EU CyberNet project team. Stakeholder Community Points of Contact as well as EU CyberNet project team are entitled to send invitations to experts for inclusion in the database. Experts can also show interest to join the Expert Pool on the EU CyberNet's website.
5. EU CyberNet will not conduct automated decisions based solely on automated processing, including profiling, which produces legal effects concerning you or affects you.

### PERSONAL DATA THAT THE EU CYBERNET COLLECTS

6. We collect data for the sole purpose of meeting the objectives of EU CyberNet project and achieving a functioning Expert Pool.
7. When filling out the Expert Profile Form, you provide us with data that includes your name, gender, email address, phone number, nationality, and country of residence, date of birth, availability, but also your education and professional certifications. In addition, the Profile Form requires input for your professional experience(s), skillsets using relevant keywords, highlight general skills like computer literacy, public speaking, analysing, managing, training, writing and reporting, language proficiency and international professional experience. Finally yet importantly, we ask the applicant to provide a name and e-mail of at least one person who can commend you. That data will be deleted after we confirm you as an expert in the pool.
8. If the application will not be accepted, all the data will be deleted.
9. As you use our database, we shall log the activities in the Project database for the following purposes:
  - 9.1. To avoid and/or log any potential misuse of the project database, including for the detection and investigation of identity theft and its attempts, as well as cyber incidents;
  - 9.2. To detect and eliminate technical errors (a technical error can be both a hardware and software error, a network connection error, etc.);

- 9.3 To identify the causes of technical problems reported by members;
- 9.4 To handle requests from experts (notifications of possible security issues or technical failures, etc.).
10. Project web interface usage statistics log is also produced for the purpose of project management and its further development. The statistics log collects data on the use of the Project database and also on the number of visits to the database without personally identifiable data.
11. EU Cybernet plans to collect feedback on the performance of experts to evaluate the success of implementing the call for action that the expert was deployed for.

## **DATA SHARING**

12. We do not share your data with companies, organisations or individuals outside of the EU CyberNet project team except in the following cases:
13. We will share your data outside of the EU CyberNet project team when you have given your consent by showing interest for a Call For Action<sup>1</sup> made by a registered Stakeholder. When applying for a call for action, your full profile will be shared with the Point of Contact of the said call for action, who thereafter will have the opportunity to make a direct contact for further details and communication via off-platform communication channels. Your data will not be transferred to any third country outside the EU unless you have given us your explicit consent.
14. In addition, the EU CyberNet team has the right to do targeted searches in the Expert Pool at the request of the European Commission services or the European External Action Service (EEAS). Targeted searches cannot be done by anyone else than dedicated EU CyberNet project team. Results of targeted searches will be shared with no other than European Commission or EEAS for the purpose of specific external cyber capacity building projects/initiatives or other related actions.
15. If you are selected as an expert for a call for action, your relevant data will be shared with the organiser of the relevant event, travel organiser, hotel or other party involved, keeping in mind the minimum need for knowledge.
16. Access to any kind of data is strictly needs based. Stakeholder Community members can only access the data of Experts who have shown interest to their call for action and system logs can only be accessed by system and service administrators directly involved in the operation of the database, and if necessary, by cyber incident handlers.

## **SECURITY OF YOUR DATA AND DATA RETENTION**

17. We work hard to protect the EU CyberNet database and your data therein from unauthorised access, alteration, disclosure, or destruction of data we hold, including:
  - 17.1 We use encryption to keep your data private while in transit;

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<sup>1</sup> A Call for action is the announcement by a EU CyberNet Stakeholder to the EU CyberNet experts and institutions of an upcoming cyber capacity building activity and looking for a particular cyber security skillset or expert to become a contributor to it

- 17.2 We offer a range of security features, like 2 Factor Verification, avoiding Man-in-the-Middle-Attacks to help you protect your account;
- 17.3 We review our data collection, storage, and processing practices, including physical security measures, to prevent unauthorized access to our systems;
- 17.4 We restrict access to personal data to EU CyberNet project team and EU Commission and Stakeholder Community Points of Contact on terms stated in this Policy. Anyone with this access is subject to contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.
18. All logs are stored for one year from the entering of data. Personal data collected in the course of the project will be stored in the territory of the Republic of Estonia.
19. Your data shall be stored for the duration of the operation of the Project or until you have chosen to delete it.

#### **RECTIFICATION AND DELETION OF YOUR DATA**

20. Experts can rectify and change their data themselves in the Expert Pool and database.
21. If you wish to terminate your participation in the Network, you have the right to submit an application for the deletion of the account to the EU CyberNet, after which your Profile and related data is deleted from the Expert Pool and the database.
22. When you have decided to delete your data we follow a deletion process to make sure that your data is safely and completely removed from our servers. Therefore, deletion of your data might take up to 30 calendar days.

#### **CONTACT AND SUPERVISION**

23. In matters related to the processing of data by the EU CyberNet project team under RIA, please contact us by e-mailing [eucybernet@ria.ee](mailto:eucybernet@ria.ee) or directly RIA-s data protection officer Martin Parv ([andmekaitse@ria.ee](mailto:andmekaitse@ria.ee)).
24. Anyone whose rights are breached in the processing of personal data has the right to file a claim with the Data Protection Inspectorate of Estonia ([info@aki.ee](mailto:info@aki.ee)) or to Estonian Harju County Court.

#### **CHANGES TO THIS POLICY**

25. We might occasionally update and clarify this Privacy Policy if the situation so requires. Your rights under this Privacy Policy will not be changed without your explicit consent. We always indicate the date when the last changes were published and we offer access to archived versions for your review. If changes are significant, we will provide a more prominent notice.