

SOILL HUB PRIVACY POLICY

Date: 16/01/2025

1 DEFINITIONS

Capitalized terms throughout this Privacy policy shall have the following meaning:

- **"Controller"** means the person who, alone or jointly with others, determines the purposes and means of Processing.
- **"Data"** means any information about an identified or identifiable natural person (the **"data subject"**) directly or indirectly, in particular by reference to an identifier (name, identification number, location data, online identifier, etc.) or one or more elements specific to his or her identity.
- **"Processor"** is the person who processes Data on behalf of the Controller. Data may be shared with them in order to provide, support and maintain the Platform and Service.
- **"the Company"** or **"we"**, or **"LGI"**, refers to LGI SUSTAINABLE INNOVATION, SASU with a share capital of €50,000.00, whose registered office is located at 6 CITE DE L'AMEUBLEMENT, 75011 PARIS, registered in the Paris Trade and Companies Register under number: 485 241 368, and represented by Mr Vincent Chauvet.
- **"Platform"** means the online SOILL Hub, allowing Users to interact and share Content on issues related to soils.
- **"Policy"** means this Privacy policy.
- **"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, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- **"Project"**, means the SOILL Framework Partnership Agreement and the related implementation Specific Grant Agreements, including the SOILL-Startup project, funded by the Horizon Europe Missions Work Programme Europe to support Mission Soil Living Labs and Lighthouses.
- **"Recipient"** means a natural or legal person, public authority, agency or other body to which personal Data is disclosed, whether or not it is a third party.
- **"Regulation"** means 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 on the free movement of such data ("GDPR").
- **"Service"** refers to the service provided by LGI, consisting in making the Platform and its functionalities available to Users.
- **"Account"** means the personal account allowing the User to access the Platform after logging in using an email address and single-use code.

- **"Content"** refers to content of any kind posted on the Platform by its Users, and subject to the intellectual property rules corresponding to the license detailed in the corresponding paragraph of the Platform's [Legal Notice](#) and [Terms and Conditions of Use](#).
- **"User"** or **"you"** means the natural person who has created an Account on the Platform and uses the Service, regardless of its role.

2 CONTROLLER

SOILL Joint Controllers, constituted by LGI SUSTAINABLE INNOVATION established in 6 CITE DE L'AMEUBLEMENT, PARIS, France, EUROPEAN NETWORK OF LIVING LABS IVZW (ENoLL) established in PLEINLAAN 9 1050 BRUSSEL, Belgium, are committed to protecting the online privacy of the users of the Platform.

In general, any information and data which you provide to SOILL Joint Controllers over the platform, or which is otherwise gathered via the platform by SOILL Joint Controllers in the context of the use of platform and service, will be processed by SOILL Joint Controllers in a lawful, fair and transparent manner. To this end, and as further described below, SOILL Joint Controllers take into consideration internationally recognized principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimization, data quality and confidentiality.

The platform is controlled by the SOILL Joint Controllers. At LGI, the platform is controlled exclusively by LGI's Tech Business Unit. As a result, the 3 other Business Units (BU strategy, BU management, BU communication) will never have administrator access to the platform or any private access to the back-end.

3 DATA INVOLVED

As part of your access to the Platform and use of the Service, we collect the following Data:

- Login information: email, password.
- Identity: name, first name
- Data related to your professional activity: organization, and position; if you are a SOILL (SOILL-Startup or following SGAs) Consortium project member or not
- Your acceptance or refusal to receive news and updates
- When you browse the Platform, we also collect browsing Data, the details of which are set out in our Cookie Policy.

The above data is mandatory and necessary to create your account on the Platform. If you do not provide this data, you will not be able to create an account.

- Account access and usage data: IP address, operating system, logs, browser identifiers, connection time and duration, content viewed and downloaded, use of Platform features, settings selected.
- Your interests: tags related to your main interests

- The presentation details that you have filled in on your profile
- The notifications you have chosen to receive
- The groups you have created or joined on the Platform as well as the content you publish in these groups
- Information about the events you organize or participate in
- The content you interact with on the platform (including comments you write)
- The messages you write to other Users using the chat
- The articles you publish in the knowledge repository and the data related to your requests to submit articles to the knowledge repository

The above data are optional, their provision is intended to allow you to benefit from the various features of the Platform. If you do not provide this data, you will not be able to benefit from the associated features.

4 PURPOSES AND LEGAL BASIS FOR DATA PROCESSING

We process the Data identified in point 3 above for the purposes and in accordance with the legal bases set out below:

- Providing the Platform and its functionalities to Users, including the customization of the Platform according to your interests: the legal basis for the Processing is the performance of the contract entered into between you and LGI.
- Carrying out audience analyses and compiling statistics for the purpose of improving the Platform: the legal basis for the Processing is LGI's legitimate interest in using the User's Data for the purpose of improving its Service.
- Sending news and updates by email to Users: the legal basis of the Processing is the User's consent to receive commercial solicitations.

You always have the right to object to receiving commercial communications from us.

- The handling of requests relating to Personal Data (right of access, rectification, right to object, and more generally the rights described in the Policy): the legal basis for the Processing is LGI's legal obligation to allow Users to exercise their rights with regard to Data protection.

5 DATA MANAGEMENT

For the SOILL project, data hosting is conducted on a **dedicated server**, ensuring the highest standards of security and data integrity. This server is exclusively allocated to the SOILL project and is entirely independent from the servers used for other LGI platforms, significantly minimizing the risk of data breaches and unauthorized access. All data stored

on the server is encrypted using advanced encryption standards, ensuring that even in the unlikely event of unauthorized access, the data remains unintelligible and protected.

Access to the data on the server is strictly controlled and monitored, with only authorized personnel granted access through a role-based access control system. This means individuals can only access data necessary for their specific roles, further reducing the risk of data exposure. The dedicated server is protected by robust firewall systems that monitor and control incoming and outgoing network traffic based on predetermined security rules, acting as a barrier against potential threats.

An Intrusion Detection System (IDS) is in place to continuously monitor network traffic for any signs of malicious activity or security policy violations, alerting the security team to potential intrusions and allowing for prompt action to mitigate any threats.

Additionally, regular data backups are performed to ensure data integrity and availability. In the event of a system failure or data loss, these backups enable the restoration of data to its previous state, ensuring continuity and reliability. The dedicated server hosting the SOILL project data complies with all relevant legal and regulatory standards, including GDPR, HIPAA, and other applicable data protection laws, ensuring that data handling practices meet stringent legal requirements.

The Data Curator for the SOILL project is ENOLL (European Network of Living Labs). ENOLL is responsible for the management and oversight of data related to users and Living Labs. This data will be strictly restricted and controlled to ensure both privacy and security. Access to the database is highly regulated. Only ENOLL staff members are authorized to access the Living labs data, ensuring that it is managed by experienced professionals dedicated to maintaining its security. Additionally, access is granted to two **appointed persons at LGI: Fabien Fruleux and Nicola Manisi**. These individuals have been specifically chosen for their roles due to their expertise and trusted positions within the organization.

To further ensure data protection, rigorous access control measures are in place. These include robust authentication protocols and monitoring systems that track access and usage. This ensures that any access to sensitive data is both justified and logged, preventing unauthorized use. These measures ensure that user and Living Lab data is handled responsibly, maintaining compliance with relevant data protection regulations and fostering trust among all stakeholders.

6 DATA STORAGE PERIOD

The Personal Data we process is stored for the periods of time set out in the table below.

More generally, we may archive information demonstrating the performance of our contractual obligations until the expiration of the period of limitation applicable to legal actions, for the proper defense of our interests before the courts.

Data	Storage period
Data necessary for the provision of the Service and for the management of contractual and commercial relations	3 years from the last active behavior of the User or, failing that, from the end of the contractual relationship.
Data processed for the purpose of sending news and updates	3 years from the end of the last Specific Grant Agreement within the SOILL Framework initiative, as specified by the corresponding GA.
Data collected by cookies during your navigation on the Platform	Cookies' lifetime: Up to 13 months from the initial deposit of the cookie (this duration is not extended for each visit of the Platform). The information collected through these cookies is kept for a maximum of 25 months.
Personal data included in articles you publish in the knowledge repository	Until you ask for its removal
Data relating to identity documents in the event of exercising the right of access or rectification	1 year from the date of receipt (in case of exercising the right of opposition, this data can be archived for 3 years)

7 COOKIE POLICY

We use several types of cookies on the Platform for the sole purpose of carrying out the transmission of a communication over an electronic communications network, or as strictly necessary in order to provide the Service.

Cookie	Supplier	Functionality
PHPSESSID	LGI	Keeps the configuration of user settings through page requests.

8 DATA RECIPIENTS

In the course of providing the Service, we may transfer your personal data to the recipients listed below. Transfers of Data are carried out in compliance with the applicable Regulation, within the limits of the Data strictly necessary and while ensuring their security.

- **LGI's assigned employees**, who signed a NDA.
- **Third parties** who place cookies on the Platform will have access to the Data generated during your browsing session, if you have agreed to such cookies.
- **Certain users of the Platform with extended access rights** will be able to access the information you have entered on the Platform.
- Our **hosting service provider** (see [Legal Notice](#)) will have access to all information on the Platform.
- SOILL-Startup partners, on a need-only basis, engaged in providing or supporting the Service and following the necessary Conflict of Interest clearance:

- CLIMATE-KIC HOLDING BV (CKIC) established in PLANTAGE MIDDENLAAN 45, AMSTERDAM 1018 DC, Netherlands
- AARHUS UNIVERSITET (AU) established in NORDRE RINGGADE 1, AARHUS C 8000, Denmark
- EUROPEAN FOOD INFORMATION COUNCIL (EUFIC) established in RUE BELLIARD 2A, BRUXELLES 1040, Belgium
- CENTRO INTERNAZIONALE DI ALTISTUDI AGRONOMICI MEDITERRANEI (CIHEAM Bari) established in VIA CEGLIE 9, VALENZANO 70010, Italy
- OKOLOGIAI MEZOGAZDASAGI KUTATOINTEZET KOZHASZNU NONPROFIT KFT (OMKI) established in MELCZER UTCA 47, BUDAPEST 1174, Hungary
- "ASOCIACION DE INDUSTRIAS DE CONOCIMIENTO Y TECNOLOGIA - GAIA
- EUSKALHERRIKO EZAGUTZA ETA TEKNOLOGIA INDUSTRIEN ELKARTEA (GAIA) established in PORTUETXE BIDEA, N14, EDIFICIO IBAETA, PLANTA 1ª, SAN SEBASTIAN 20018, Spain"
- EIGEN VERMOGEN VAN HET INSTITUUT VOOR LANDBOUW- EN VISSERIJONDERZOEK (EVILVO) established in BURG. VAN GANSBERGHELAAN 92 BUS 1, MERELBEKE 9820, Belgium
- EUROPEAN LANDOWNERS ORGANIZATION (ELO) established in RUE DE TREVES 67, BRUXELLES 1040, Belgium
- INTERNATIONAL FEDERATION OF ORGANIC AGRICULTURE MOVEMENTS EUROPEAN UNION REGIONAL GROUP (IFOAM) established in SUNNERSBERG HOG 1, LIDKOPING 531 98, Sweden
- EUROPEAN ENVIRONMENTAL BUREAU (EEB) established in RUE DES DEUX EGLISES 14-16, BRUXELLES 1000, Belgium
- EUROPEAN FOREST INSTITUTE (EFI) established in YLIOPISTOKATU 6 B, JOENSUU 80100, Finland
- WATER EUROPE (WE) established in BOULEVARD A. REYERS 80, BRUXELLES 1030, Belgium
- ASSOCIATION OF CITIES AND REGIONS FOR SUSTAINABLE RESOURCE MANAGEMENT (ACR+) established in AVENUE DES ARTS 3-4-5, BRUXELLES 1210, Belgium
- FIBL EUROPE - FORSCHUNGSINSTITUT FÜR BIOLOGISCHEN LANDBAU IN EUROPA (FIBL EUROPE) established in RUE DE LA PRESSE 4, BRUSSELS 1000, Belgium
- BIOSENSE INSTITUTE - RESEARCH AND DEVELOPMENT INSTITUTE FOR INFORMATION TECHNOLOGIES IN BIOSYSTEMS (BIOSENSE) established in DR ZORANA DINDICA STREET 1, NOVI SAD 21000, Serbia
- KRAKOWSKI PARK TECHNOLOGICZNY SP ZOO (KTP) established in UL. PODOLE 60, KRAKOW 30 394, Poland
- ARISTOTELIO PANEPISTIMIO THESSALONIKIS (AUTH) established in KEDEA BUILDING, TRITIS SEPTEMVRIOU, ARISTOTLE UNIVERSITY CAMPUS, THESSALONIKI 546 36, Greece

- GEMEENTE EINDHOVEN (EINDH) established in STADHUISPLEIN 10, EINDHOVEN 5600 RB, Netherlands
- STICHTING DELTARES (DELTARES) established in BOUSSINESQWEG 1, DELFT 2629 HV, Netherlands
- CONSIGLIO PER LA RICERCA IN AGRICOLTURA E L'ANALISI DELL'ECONOMIA AGRARIA (CREA) established in via della navicella 2-4, ROMA 00184, Italy
- FUNDACION INSTITUTO INTERNACIONAL DE INVESTIGACION EN INTELIGENCIA ARTIFICIAL Y CIENCIAS DE LA COMPUTACION (AIR), PIC 904614338, established in PAZA DEL AYUNTAMIENTO 1, CARBAJOSA DE LA SAGRADA 37188, Spain

Our **customer relationship management (CRM)** Service provider will have access to the following data in accordance with its own privacy policy: <https://www.brevo.com/legal/privacypolicy/>: email address, first and last name, User type, Living labs, Company, Position / Occupation; Location; is SOILL consortium member or not; Is member of a Regional Institution or not; Regional Institution Name; consent or refusal to receive news and updates.

Our video conferencing service provider: will receive the data generated in the course of organizing and conducting video calls, in accordance with its own privacy policy: <https://jitsi.org/meet-jit-si-privacy/>.

The video conferencing service provider of your choice (if you decide to use another service provider than the one offered on the Platform): will receive the data generated in the course of organizing and conducting video calls, according to its own privacy policy.

Upon request, the police, administrative or judicial authorities whose right to access Personal Data is recognized by law will receive your Data in case of request from them or in order to enforce our rights.

9 TRANSFER TO THIRD COUNTRIES

In this case, and before any transfer, LGI makes sure to respect the appropriate measures to ensure the security of such transfer through the European Commission's Standard Contractual Clauses.

You can obtain more detailed information about this transfer by contacting us at: privacy@SOILL.eu

10 EXERCISING YOUR RIGHTS

In accordance with the Regulation, you have the following rights with respect to your Personal Data:

- **Right of access** to your Data being Processed (including the right to request a copy) and to the information provided in this privacy policy (Article 15 GDPR). When the legal basis for the Processing of Data is our legitimate interest, you have the opportunity to request information from us about the balancing we have carried out between the interests of Users and those of LGI prior to such Processing.
- **Right to rectification** (Article 16 GDPR) of inaccurate personal data concerning you and to have incomplete personal data completed.
- **Right to withdraw your consent at any time** (Article 13-2c GDPR) for all Data Processing based on the legal basis of your consent.

In addition, as regards commercial prospecting, you have the possibility to unsubscribe at any time from our mailing list by clicking on the unsubscribe link in our communications or by contacting us to stop receiving these messages.

- **Right to object** (Article 21 GDPR) to the Processing of your Data where such Processing is based on our legitimate interest.
- **Right to erasure of** your Personal Data (Article 17 of the GDPR) in the following cases:
 - When the Data is no longer needed by us.
 - When you have withdrawn your consent to their Processing (if the Processing was based on consent).
 - If you object to Processing that is legally based on LGI's legitimate interests or Processing for the purpose of profiling.
- **Right to restriction of Processing** of your Personal Data, which, unless there are compelling reasons, can only be carried out with your consent (Article 18 GDPR) when:
 - you contest the accuracy of the personal Data we process, for a period enabling us to verify their accuracy;
 - If the Processing is unlawful but you oppose the erasure of the Data and request the restriction of their use instead;
 - When we no longer need the Data for the purpose of the processing but they are still necessary for the establishment, exercise or defence of legal claims;
 - Where you have objected to Processing based on our legitimate interest, for the time necessary to balance our respective interests.
- **Right to the portability** of Personal Data you have provided when they are subject to automated Processing based on your consent or on a contract (Article 20 GDPR). This right means that you have the possibility to request the communication of this Data in a structured, commonly used and machine-readable format so that they can be transmitted to another Controller.

For any request to exercise the aforementioned rights or for more information, you can contact us at: privacy@SOILL.eu or by post at the address of the Company's headquarters indicated at the top of the page.

We reserve the right to ask you to specify your request and to provide us with proof of identity (which will be kept for one year in the event of exercising the right of access or rectification and three years in the event of exercising the right of opposition).

If you are not fully satisfied with our response, you always have the **right to lodge a complaint with the relevant authority responsible for the control** and protection of personal data (the list of which can be found here: https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).

11 SECURITY

Commitments. We undertake to implement all appropriate technical and organizational measures through physical and logistical security measures to ensure a level of security appropriate to the risks of accidental, unauthorized or illegal access, disclosure, alteration, loss or destruction of your Personal Data.

We recommend you to be careful about what information you choose to make public on the Internet, especially regarding the disclosure of Personal Information, including personal or sensitive information made public by you or inferred from your contributions, comments and statements of any kind on the Platform and/or conversations with other users of the Platform.

Https protocol. The URL address of the Site begins with "https" and is accompanied by a closed padlock or a key that appears at the bottom right of your browser. This allows you to verify that you are in a secure browsing area, especially when your credit card number is requested. The security standards of the Https protocol are high and applied to the storage of Data.

Data Breach. In the event of a data breach resulting in the modification, disappearance or unauthorized access to your personal Data, we will:

- Examine the causes of the breach;
- Take the necessary measures to limit the negative effects and prejudices that may result from the breach;
- Notify the supervisory authority and/or the persons concerned of the incident as soon as possible when required by applicable Regulation.

In no case shall the commitments defined in the above point be considered as an admission of fault or responsibility in the case of a data breach.