

1. Data protection policy ETELM

Data protection policy for ELECTRONIQUE TELEMATIQUE ETELM in project INTREPID

1. Introduction

1.1. This document represents the policy of ELECTRONIQUE TELEMATIQUE ETELM (hereinafter – ‘we’/‘us’/‘Organization’) with regards to the processing of personal data within the INTREPID project.

1.2. INTREPID project (Intelligent Toolkit for Reconnaissance and assessmEnt in Perilous Incidents) is a research project currently run under the Horizon 2020 Framework Programme under the grant agreement no. 883345.

1.3. The overall aim of the INTREPID project is to create an unique platform to improve and accelerate the exploration and assessment of disaster zones. This done by seamlessly integrating Intelligence Amplification and eXtended Reality concepts, with unprecedented Smart Cybernetic Assistants and innovative deep indoor Networking and Positioning capabilities. The project will validate its effectiveness, in iterative and complementary pilots, to support the rescue operations done by first responders in areas that are complex or dangerous to explore.

2. Scope of the policy

2.1. This policy only considers the processing of personal data by the Organization concerning its participation in the INTREPID project. Other processing activities carried out by the Organization are outside the scope of this policy.

2.2. The participation of the Organization in the INTREPID project will include providing a Tactical Communication system to improve both indoor and outdoor Exploration capabilities of First Responders. This Tactical system is a private secure network with a dedicated radio coverage (also called “Tactical bubble”) that enables resilient mission-critical communications and tactical information exchanges, including rich media (e.g., images, video), in the field.



2.3. The Organization's activities in INTREPID may include the following processing of personal data:

- Identity and personal information such as name, age, gender and number of years of service of the first responders participating in the pilots of the Project.
- Identity and personal information such as name, age and gender of any voluntary or actor participating in the pilots of the Project.

2.4. The legal basis for processing personal data is explicit and informed consent of data subject. We use the template developed for INTREPID's partners and specified in the D10.1.

3. Data protection principles

We support the principles set out by the GDPR by the following measures:

3.1. lawfulness, fairness, and transparency of processing: we process personal data on the basis of informed and explicit consents of data subjects; provide them information sheets describing the processing activities, explain the relevant information about the project and processing process through communication with a data subject;

3.2. purpose limitation: we only process personal data that is necessary to reach the goals of the project;

3.3. data minimization: we only collect and process personal data that is strictly necessary to conduct our activities in INTREPID;

3.4. accuracy of data: we update/modify/erase the data upon request of the data subject or upon other discovery of its incorrectness;

3.5. storage limitation: we store the data during the term of the project; we irrevocably delete the data or anonymize it after the end of its processing;

3.6. integrity and confidentiality: we limit the scope of people having access to personal data to those who work in our Organization and participate in the project; we store the personal data separately and use authentication procedures to control the access to it.

3.7. accountability: we use this policy to set and demonstrate compliance with the GDPR.

4. Rights of data subjects

We respect the rights of data subjects specified in the GDPR, including:

- 4.1. the right to ask us what data are being collected about the data subject and how those data will be used in connection with the INTREPID project (“right to access”);
- 4.2. the right to lodge a complaint with a supervisory authority (“right to complain”);
- 4.3. the right to request us to correct any of data subject’s personal data that are inaccurate (“right to rectification”);
- 4.4. the right to request us to erase data subject’s personal data (“right to erasure” also “right to be forgotten”), unless such a request would render impossible or seriously impair the achievement of the objective of that processing – including the impairment or invalidation of the research;
- 4.5. the right to request us to restrict the processing of data subject’s personal data (“right to restriction of processing”);
- 4.6. the right to receive the personal data related to the data subject which he/she has provided to us and to transmit those data to another controller (“right to portability”); and
- 4.7. the right to object, at any time, to us regarding the processing of data subject’s personal data (“right to object”).

5. Other provisions

- 5.1. This policy is effective as of 1st October 2020 till the end of the processing activities or the end of the Project in 30th September 2023.
- 5.2. This policy will be reviewed annually and updated if needed until the end of its effect.
- 5.3. We have chosen not to appoint the Data Protection Officer while it is not required for our processing activities.
- 5.4. All our employees having access to personal data specified herein, will be informed on this policy and other measures expected from them to be compliant with the GDPR.

5.5. The person controlling the implementation of this policy and other measures to comply with the GDPR from the side of the Organisation is Alyona Karavaeva (Email alyona.karavaeva@etelm.fr).

5.6. In case of questions regarding data protection rules and implementation of this policy the Organization will consult with INTREPID's Societal, Ethical and Legal Manager (István Böröcz (VUB), Istvan.Mate.Borocz@vub.be).