MEMO: INPRO website privacy and cookie statements

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| To: | Gert Douma, Lennart Koster |
| CC | Nghitti Saro, Fokke Witteveen en Maarten Cornelissen |
| From: | Andrea Werkman |
| Date: | 1-4-2021 |
| Version: | 1.0 voor vertaling NL naar Engels en plaatsing op de website |
| Subject: | Privacy and cookiestatements |
| Goal/ decision/ question: | Deze teksten voor INPRO website geschikt maken.  Dd. 1-4-2021 toestemming van Gert om de aangepaste versie aan te bieden voor vertaling en zowel de cookie als privacy statement op te nemen op de website. Daarna met Fokke Witteveen website doorlopen en dan launch. |

# Privacy statement

INPRO, an EU co-funded project, with its place of business at Petrus Driessenstraat 3, 9714 CA Groningen, the Netherlands, is responsible for the processing of personal data, as set out in this privacy statement. INPRO is a partnership between Hanze University of Applied Sciences Groningen (the Netherlands), Fachhochschule Sankt Pölten GmbH (Austria), Artesis Plantijn Hogeschool Antwerp (Belgium), Jyväskylä University of Applied Sciences (Finland), Stichting Revalidatie Friesland Beetsterzwaag (the Netherlands), Moorheilbad Harbach Hotelbetrieb GmbH & CoKG (Austria) and Coronaria Kuntoutuspalvelut Oy (Finland).

Contact details:

[https:\\inproproject.eu](http://woo-groningen.nl/)

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The privacy policy of INPRO is in accordance with the privacy policy of Hanze University of Applied Sciences Groningen. If you have any questions or complaints, please contact [ict-security@org.hanze.nl](mailto:ict-security@org.hanze.nl).

## The personal data we process

INPRO processes your personal data because you use our services or because you have provided your personal data to us. Please find below an overview of the personal data we process:

* first and last name;
* contact details;
* telephone number;
* email address;
* other personal data that you actively provide, for instance, by creating a profile on this website, in correspondence and by telephone;
* data relating to your activities on our website.

## Special category or sensitive data we process

Our website and/or service has no intention to collect data on website visitors under the age of 16, unless consent has been granted by their parents or guardian. However, we are unable to verify whether a visitor is over 16 years of age. We would therefore advise parents to be involved in the online activities of their children to prevent children’s data from being collected without their consent. If you are convinced that we have collected data about a minor without consent, please contact us at [ict-security@org.hanze.nl](mailto:ict-security@org.hanze.nl). We will then delete this information.

## With what purpose and on what basis do we process personal data?

You voluntarily submit personal data to INPRO, and you can always withdraw your consent.   
INPRO processes your personal data for customer relationship management purposes; the basis for being able to communicate with our customers begins with recording company and personal data. We endeavour to ensure that such data are as accurate, complete and current as possible so that we can maintain targeted and relevant contact during the INPRO project. The purposes for which the various contact moments are used include mailings, newsletters and invitations to events. In addition, we would like to know who uses the materials published on this website.

## Automated decision-making

INPRO does not make decisions on matters that may have considerable consequences for individuals based on the automated processing of personal data.

## How long we retain personal data

INPRO retains your personal data no longer than is strictly necessary to achieve the objectives for which your data are collected. Your data will be destroyed as soon as possible upon deregistration.

For all data provided, we maintain a maximum retention period of five years after completion of the project (until 2029). This allows us to share with you any documentation that will still be supplied and amended after completion of the project.

## Sharing personal data with third parties

INPRO will not sell your personal data to third parties and will only provide these data if this is necessary for the performance of our agreement with you or to comply with a legal requirement.

Inspection, correction or deletion of data

You are entitled to inspect, correct or delete your personal data. You are also entitled to withdraw your consent for the processing of data or to lodge an objection against the processing of your personal data by INPRO, and you have the right to data portability. This means that you may submit a request to send the personal data in our possession in a computer file to you or another organisation indicated by you. You can submit a request for the inspection, correction, deletion or transfer of your personal data, a request to withdraw your consent or an objection to the processing of your personal data to [ict-security@org.hanze.nl](mailto:ict-security@org.hanze.nl). We will respond to your request as soon as possible, but within four weeks at the latest. INPRO would also like to point out that you have the possibility to submit a complaint to the national supervisory authority, the Dutch Data Protection Authority. You can submit a complaint using the following link: <https://autoriteitpersoonsgegevens.nl/nl/contact-met-de-autoriteit-persoonsgegevens/tip-ons>.

## How we protect personal data

INPRO takes the protection of your personal data seriously and has taken appropriate measures to prevent misuse, loss, unauthorised access, inappropriate disclosure and unauthorised changes. If you believe that your data are nevertheless not being adequately protected or there are indications of misuse, please contact [ict-security@org.hanze.nl](mailto:ict-security@org.hanze.nl).

# Cookie statements

## INPRO Cookie Policy

The INPRO website uses cookies, small text files that are installed on a PC, tablet or mobile phone by a website. Cookies are anonymous and not linked to any profile, so INPRO cannot trace the data back to any individual. We use cookies to provide you with the best possible service on our website. All websites are legally obliged to inform their users about the nature of the cookies they use.

INPRO uses cookies to:

test and improve our website in order to improve the user experience and assess the effectiveness of our online marketing campaigns, so that we can tailor these to our visitors

to activate high contrast for all the pages you approach in the actual session

The INPRO website uses two types of cookies: functional cookies and cookies for website statistics.

## Functional cookies

We use cookies to improve how you experience our website, e.g. by remembering your language of choice and other preferences. We are not legally obliged to ask your permission to use these cookies.

Cookies for website statistics

The American company Google places cookies on our website as part of its analytics service. We use this service to monitor how visitors use the website. These cookies primarily record the time that a website was visited and certain information from the visitor's browser and send these data to Google. The data are used for statistical analyses of the visits to and click-behaviour on the website. We use this information to improve our online communication, user-friendliness and to report cumulative data to the funding body (Europen Union). Google may provide this information to third parties if legally obliged to do so or in order for them to process the data on behalf of Google. We have no influence on this third party use. The information is stored on Google's servers in the US. Google endorses the Safe Harbor principles and is an affiliate of the Safe Harbor programme of the US Department of Commerce. This entails that they apply an appropriate level of security to all personal data they process.

| Name of cookie | Use | Useful life |
| --- | --- | --- |
| KirraSID | Functional user settings & CSRF protection | Until browser is closed |
| \_ga | Anonymised statistics | 2 years |
| \_gat | Anonymised statistics | 24 hours |
| \_gid | Anonymised statistics | 24 hours |

[Lennart, graag invullen]

The personal data are used for internal purposes and will not be transferred to other organisations for commercial purposes.

## Changing your cookie preferences

If you want to remove cookies from a device then you can do so using the device's browser. You can also opt to block all cookies in your browser settings.

[Lennart – Kunnen we hier een popupje maken voor toestemmingen?]

Do you have any questions about our cookie policy?

Please contact INPRO at [nieuwemedia@org.hanze.nl](mailto:nieuwemedia@org.hanze.nl).