

## CMINE Privacy Policy

Dublin, Republic of Ireland, 01 September 2023

Knowledge, expertise and trust are important pillars of the service of the Resilience Advisors Network (RAN). We are committed to giving you clarity on how we handle your personal data.

In this Privacy Statement we inform you about our approach to handling and processing of personal data.

This Privacy Policy is made by Resilience Advisors (Europe) Limited, a legal entity having its registered office at 22 Northumberland Road, Dublin D04 ED73, Ireland and registered with Reg No. 614202 (hereafter, the “Company”).

The Company provides the Crisis Management Innovation Network Europe (CMINE) Platform (hereafter, the “Platform”) to registered users and as such have a use account (hereafter, the “Users”). The Platform is available at the following URL address [www.cmine.eu](http://www.cmine.eu)

The Company uses a customisable networking platform called “Hivebrite”, which enables the import and export of user lists and data, the management of content and events, the organization of emailing campaigns, the sharing of opportunity research as well as the management of funds and contributions of any kind.

In this regard, as data controller, the Company pays particular attention to the respect of its Users privacy and personal data protection. The Company is committed to ensure the compliance of its data handling as data controller with the applicable provisions of the “Loi n°78-17 dated January 6, 1978, relative à l’informatique, aux fichiers et aux libertés” and the EU Regulation EU 2016/679 regarding data protection dated April 27, 2016.

In order to do so, the Company has put in place an appropriate privacy policy which guarantees an optimal level of protection of its Users’ data.

This privacy policy is intended for the Users of the Platform of the Company.

The Company informs the User that no personal data as defined by applicable laws and regulations shall be collected without the prior explicit consent of the User. The User expresses his or her consent upon when registering to the Platform, and after consulting this privacy policy.

### 1. Contact details

The Resilience Advisors Network (RAN) is the data controller and is located at 22 Northumberland Road, Ballsbridge, Dublin 4, D04 ED73. By telephone you can reach us on +353 (1)906 9575, by e-mail at [admin@cmine.eu](mailto:admin@cmine.eu)/

### 2. Who is this Privacy Statement applicable to?

This Privacy Statement applies to all persons whose RAN processes personal data via the CMINE website ([www.cmine.eu](http://www.cmine.eu)). Personal data are all data that contains information about persons with which those persons are identifiable.

### 3. Which personal data do we process?

RAN respects your personal data and ensures that the personal information provided to us or otherwise obtained is treated confidentially. Personal data is all information about a person. Data that indirectly says something about someone is also personal data.

By processing personal data we mean: collecting, recording, organising, storing, updating, modifying, retrieving, consulting, using, providing by means of forwarding, distribution or any other form of posting, bringing together, linking together, and to protect, erase or destroy your personal data.

We process personal data that you have provided to us, personal data generated during your visit to the CMINE website and reading campaigns and newsletters and personal data that we have derived from other sources, such as business social media platforms and business cards.

When registering to the Platform, the User is informed that his or her personal data is collected. They include:

- Personal identification information necessary for the management of your involvement in the CMINE community ((name, email, phone number, address, etc.);
- Information regarding professional background and expertise (university education, professional experiences and CV etc.).

The User commits himself or herself to only provide accurate, exhaustive, and regularly updated data regarding his or her identity and any information he or she posts on the Platform. Under no circumstances shall the Company be liable for any data that is illegal and contrary to public order provisions. In case the User was not consenting to the collection of the above-mentioned data, he or she shall be informed that he or she cannot have access to the Platform.

During the use of the Platform the User may validly publish, at his or her own initiative, any content on the Platform which shall be kept by the Company:

- for maintaining and advancing the community for the foreseen purposes.

The User commits himself or herself not to publish any content which contains, including but not limited to, any remarks/images/pictures, contrary to applicable laws and regulations, to public order and good morals, or affecting the rights of third parties, including but not limited to:

- Identity fraud of a third person;
- Remarks/publish pictures or images that are violent, defamatory, offensive, malicious, obscene, inciting to discrimination or hatred, racist, xenophobic, anti-Semitic, condoning or approving war crimes, inciting to committing a crime, offense, act of terrorism, or contrary to the security of minors;
- Counterfeiting the intellectual property rights of a third person;
- Commercial canvassing or elements that could be qualified as unfair competition.

In any event, Hivebrite shall not be liable for the content, accuracy, or up-to-date state of the information freely published by the User.

The User consents that, following the publication of the content, the information he or she provides will become public on the Platform and that as such, same information will be published, modified, translated, reproduced in any form and accessible, saved and reproduced by other Users and the Company.

In most cases, Users post contents without previous moderation from the Company. The Company does not alter the content or information provided by the User, except under exceptional circumstances. The

Company reserves its right to freely delete or amend the content or information of the User, without prejudice to the Users.

If some content posted on the Platform was to contravene the present privacy policy, applicable laws or the rights of third parties, any person can alert the Company of the existence of such Content at the following address: [admin@cmine.eu](mailto:admin@cmine.eu)

The User is informed that the Company does not collect any particularly sensitive data as defined by applicable laws and regulations.

The Company informs the User that Hivebrite, as well as its subcontractors, uses a tracking technology on its terminal such as cookies whenever the User navigates on the Platform.

A cookie is a message that, subject to the User settings, is sent to its terminal when the User navigates on a website. The aim is to collect data regarding the internet navigation of the User to send tailor-made services to its terminal (computer, mobile phone or tablet). The cookies that are sent to the User's terminal are detailed in the cookie statement [here](#).

The CMINE website may contain hyperlinks to websites of other parties and social media buttons. We are not responsible for the content of those websites or the services of relevant social media platforms. Nor is RAN responsible for the privacy policy and the use of cookies on those websites and social media platforms.

#### 4. What are we using your personal data for?

The Company and its subcontractors collect, process and host personal data that are freely transferred by the User when accessing the services proposed by the Platform.

Collected Data	Purpose of the processing
<p>When subscribing on the Platform:</p> <ul style="list-style-type: none"><li>• Personal identification information (name, email, phone number, address, etc.);</li><li>• Information regarding professional background and expertise (university education, professional experiences and CV etc.).</li></ul>	<ul style="list-style-type: none"><li>• Access to the Platform;</li><li>• Creation of a user account;</li><li>• Access for the User to all functionalities of the Platform;</li><li>• Management of requests to access, amend, delete, limit and oppose.</li></ul>
<p>When using the Platform:</p> <ul style="list-style-type: none"><li>• Content and contributions to the community;</li></ul>	<p>The use and feeding of the Platform;</p> <ul style="list-style-type: none"><li>• Sending invitations for events organized by the Company or other Users, if the User has accepted to receive such invitations;</li><li>• Sending offers from the Company or its partners if the User has accepted to receive such offers.</li></ul>

<p>Cookies, trackers:</p> <ul style="list-style-type: none"> <li>• Add to calendar</li> <li>• Keep active session</li> <li>• The user/admin ID</li> <li>• User first connexion</li> <li>• Identify the user session</li> <li>• Admin ID</li> <li>• User search</li> <li>• Google analytics #1, #2, #3</li> <li>• LinkedIn</li> </ul>	<ul style="list-style-type: none"> <li>• Improve the quality of the services proposed by the Platform;</li> <li>• Improve the usage functionalities of the Platform;</li> <li>• Create statistics regarding the effective use of the Platform;</li> <li>• Enable the User not to have to reconnect to the Platform for every new navigation on the Platform;</li> <li>• Invite the User to events organized by the Platform;</li> <li>• Create statistics regarding the different levels of activity on the Platform. The cookies cannot allow to identify the User;</li> <li>• Enable the synchronization of the User's LinkedIn profile;</li> <li>• Manage banking transactions.</li> </ul>
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The Company collects and processes the User's personal data for the sole purpose that the platform can be optimally set up and used.

Your contact details can be used for sending newsletters, updates, invitations to events and seminars and sending information that you have requested from us.

- Improving our product and service information and carrying out targeted marketing campaigns.

We find it important to approach you with information that is relevant to you. To make this possible, we combine and analyse the personal data available with us. On that basis we determine which information and channels are relevant and which moments are most suitable for providing information or establishing contact. In marketing campaigns we do not process any special personal data and also no confidential data. If we would like to create a personal, individual customer profile, we will ask for your prior permission. If you would like to withdraw this consent later, this is always possible.

We analyse the following data:

- Interaction data: Personal data obtained from contact between RAN and you. For example about your use of our website or supported applications. This also applies to offline interactions, such as how often and when there is contact between RAN and you.
- Behavioural data: Personal data that RAN processes about your behaviour, such as your preferences, opinions, wishes and needs. We can derive this data from your surfing behaviour on our website, reading our newsletters or because you have requested information. But also through contact, incoming telephone calls and e-mail contact with our employees. Information obtained through tracking cookies, we collect and use only with your permission, which you can always withdraw.  
See our cookie statement
- Performing and analysing research into client satisfaction. Sometimes we ask clients to cooperate in a client satisfaction survey. This is done through an online questionnaire. Participation in this is voluntary. Prior to each client satisfaction survey you will receive further information about the working method and the way we deal with the information obtained.
- Improving and securing our website [www.cmine.eu](http://www.cmine.eu)
- Creating user statistics. The user statistics of the website enable us to get a picture of the number of visitors, the duration of the visit, which parts of the website are being viewed and the click-behaviour. It concerns generic reports, without information about individuals. We use the information obtained to improve the website.

## 5. Security level

We protect personal data, taking into account the state of the art, using appropriate technical and administrative security measures to minimize the risk of loss, misuse, unauthorized access, disclosure and modification. You can think of security software such as a virus scanner and firewalls, a secure internet connection, encryption of data and physical and administrative access controls to data and servers.

## 6. Storage of personal data

We do not store your personal data for longer than is strictly necessary for the execution of the purposes. If legal regulations apply to the storage, the personal data will not be kept longer than prescribed by law.

## 7. Legal basis of the processing

We process personal data on the basis of one of the following legal grounds:

- Obtained permission
- On the basis of an agreement or in the run up to the conclusion of an agreement
- Legal obligation
- In connection with a legitimate interest.

A controller may only process personal data if this can be based on one of the limitative enumerated legal grounds in the General Data Protection Regulation (GDPR). The four legal grounds on which RAN relies are:

- Permission:  
If we have requested your permission to process your personal data and you have given this permission, then you also have the right to withdraw this consent.
- Agreement or in the run up to the conclusion of an agreement:  
If you give us an assignment to provide innovation or financing consultancy services, we process personal data if and insofar as this is necessary for the execution of the assignment.
- Legal obligation:  
We only provide personal data to supervisors of investigative authorities if this is legally required. We will take measures in such cases that are reasonably necessary to ensure that your personal data is protected as well as possible.
- Justified interest:  
We may also process personal data if we have a legitimate interest and do not therefore disproportionately infringe your privacy. For example, we use your contact information to invite you for seminars and events.

## 8. Processors

The data of the Users is accessible only by duly authorised persons for administrative or maintenance purposes regarding the Platform with the exclusion of any commercial use, and if applicable, in order to enforce the rights exercised by the Users regarding their data (in particular the right to access, rectify, oppose, port and to be forgotten).

The Company informs the User that, apart from hosting and payment services, it uses the following subcontractor: - The company KIT UNITED for its HIVEBRITE solution, a French société par actions simplifiée with a capital of 284.280,00 Euros, registered with the Paris Companies register under the number 75339171300017, having its registered office at 8, rue de la Grande Chaumière, 75008 -Paris.

Especially in light of any future developments of the applicable laws and regulations, the Company reserves its right to proceed with any modification of its privacy policy and commits itself to duly inform Users about such modifications.

## 9. Share personal data with third parties

We protect personal data, taking into account the state of the art, using appropriate technical and administrative security measures to minimize the risk of loss, misuse, unauthorized access, disclosure and modification. You can think of security software such as a virus scanner and firewalls, a secure internet connection, encryption of data and physical and administrative access controls to data and servers.

In certain cases, personal data will be provided to third parties in the following cases:

- When processing a file, it may be necessary to share your personal data with third parties. For example in probing or asking for financing to a government, or the conclusion of an agreement involving several parties.
- If a court decision obliges us to provide personal data to third parties, we will have to comply with this.
- Your personal data will not be shared with third parties for commercial purposes. There is one exception to this. Sometimes we organise a joint activity with another organization, such as an event or seminar. In that case, only the necessary contact details are exchanged.

We never sell your personal data to third parties and do not make automated decisions that could have significant consequences for you.

## 10. Transfer outside the (European Economic Area) EEA

Under the General Data Protection Regulation (GDPR), personal data may only be passed on to parties outside the EEA if an appropriate level is guaranteed for the protection of the personal data or if a specific deviation applies.

We may pass on personal data to a party outside the EEA if this is necessary for the execution of the contract for the provision of innovation or financing consultancy services.

## 11. Privacy rights of data subjects

You can send a request for inspection, correction, restriction, resistance, transferability of data, deletion of your personal data

or withdrawal of previously given permission via the contact details below. You will receive further notice from us within four weeks of receipt of your request.

In order to ensure that we provide the relevant personal information to the right person on the basis of your request, we can ask you to provide a copy of a valid passport, driver's license or identity card for verification purposes. RAN will only process requests that relate to your own personal data. For all these questions, please contact us on +353 (1)906 9575, by e-mail at [admin@cmine.eu](mailto:admin@cmine.eu)

## 12. Complaints

If you have complaints about how we handle your personal data, you can contact us by sending an email to [admin@cmine.eu](mailto:admin@cmine.eu) or by calling +353 (1)906 9575. We are happy to help you with finding a solution within a period of four weeks after receiving your request. If that does not work, you can always contact the Republic of Ireland Data Protection Authority.

## 13. Changes

Developments are fast and as a result, there may also be some changes in the personal data we request from you and the way in which we use your personal data. Regulations can also change. In that case, we will adjust this Privacy Statement. We therefore invite you to regularly check the Privacy Statement so that you are kept informed. In the event of major changes, we will also make you aware of this via the CMINE website.