

EIT KIC Urban Mobility S.L.U. – **Privacy Policy**

This Privacy Policy is created by EIT KIC Urban Mobility S.L.U., a private limited company having its registered office at Calle Pamplona 104, Barcelona (08018), Catalonia, Spain and registered under the laws of Spain under company number B67513630 (hereinafter, the “**Data Controller**”).

The Data Controller offers a platform (hereafter, the “**Platform**”), Mobility Innovators, as described in the EIT Urban Mobility - Mobility Innovators [Terms of Use](#), to its users which have registered and/or activated their accounts on the Platform and as such have a user account. The Platform is available at the following URL address: innovators.eiturbanmobility.eu

The Data Controller uses a platform called Hivebrite, which enables the import and export of user lists and data, the management of content and events, the organisation of emailing campaigns and search and connection between Users (unless permission for such has been withdrawn).

In this regard, the Data Controller collects and processes the User’s personal data in accordance with the Privacy and [Cookie Policies](#), which together with the [Terms of Use](#), constitute the legal framework applicable to the Platform (the “**Legal Terms**”).

The Data Controller is particularly aware and sensitive with regards to the respect of its Users privacy and personal data protection. The Data Controller commits to ensure the compliance of the processing it carries out as data controller in accordance with the Data Protection Law.

Data Protection Law is the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation or "GDPR") and Organic Law 3/2018, 5 December of December 5, on Data Protection and Guarantee of Digital Rights ("LOPD").

The Data Controller has put in place appropriate Privacy and Cookie Policies to be fully transparent on how the personal data of Users are processed within the use of the Platform and services provided. This Privacy Policy is intended for the Users of the Platform of the Data Controller.

If you have questions or comments regarding this Privacy Policy, you may contact our Data Protection Team at the following address: info@eiturbanmobility.eu

Date of last update: 19/12/2024.

ARTICLE 1. PERSONAL DATA COLLECTED

1.1 When registering on the Platform

When registering on the Platform, the User is informed that the following personal data is collected for the purpose of creating a user account:

Mandatory data

- First name;
- Last name;
- Email address;
- Position and Organisation;
- Current city.

Optional data:

- Main area of expertise;
- Other area of expertise;
- Organisation;
- Type of organisation;
- Phone number;
- Degree;
- Field of study;
- School name;
- LinkedIn profile URL;
- Website URL;
- About.

The User is informed that it is not possible to access the Platform without providing the mandatory data strictly necessary to create an account and authenticate the User. Mandatory data will be expressly indicated by an asterisk.

Furthermore, it is communicated to the User that the subscription request is forwarded to an administrator for deliberation on its approval or declination. Upon approval, the User shall be provided with a link to the Activation Form.

The User (the "Partner User") who previously held an account on the prior platform will only need to activate their account through an activation email, which will be sent automatically. The Partner User is required to complete all mandatory information fields to successfully activate their account.

1.2 During the use of the Platform

The User may validly publish, at its own initiative, any content on the Platform compliant with the Community Guidelines and in accordance with the permissions granted by their User Role, including:

- Profile information and bio
- Posts, comments and reactions in group or global live feed
- Comments and reactions on group or global news articles and events
- Events and news posts

- Forum posts, in the event that Forums are introduced as a feature on the Platform

These functionalities are restricted to Users with approved and activated login credentials only, not external visitors. The Company has the right to retain and store any such content published by the User.

ARTICLE 2. THE PURPOSE OF THE DATA PROCESSING

The Data Controller and its subcontractors process personal data that are freely transferred by the User when accessing the services proposed by the Platform for the following purpose:

Purpose	Legal basis
Community management and membership administration: To manage and facilitate user registration, membership, and access to community features. This includes verifying user identity, providing access to members-only content, and maintaining user profiles.	Contractual necessity (Article 6(1)(b) GDPR) – processing is necessary for the performance of the contract between the user and EIT Urban Mobility.
Communication with Users: To send users notifications, updates, and relevant information regarding community activities, events, and other communications related to their membership, unless the User has opted out of such communications.	Legitimate interests (Article 6(1)(f) GDPR) – the legitimate interest of EIT Urban Mobility in keeping members informed, ensuring engagement with the community, and providing service-related communications.
Event management and participation: To manage registrations, attendance, and communications for events hosted by EIT Urban Mobility or other Users within the Mobility Innovators platform. This may include webinars, conferences, workshops, or other events.	Contractual necessity (Article 6(1)(b) GDPR) – processing is necessary for the performance of the contract when users register for events or express interest.
Content sharing and collaboration: To allow users to share content, collaborate with other members, and contribute to discussions, projects, or resources within the community platform.	Consent (Article 6(1)(a) GDPR) – users give consent to share content and participate in community-driven collaboration.
User Support and Assistance	Legitimate interests (Article 6(1)(f) GDPR) – the legitimate interest of EIT Urban Mobility in

To provide customer support, answer inquiries, resolve technical issues, and assist users with any platform-related concerns.	offering support to its users and maintaining a functional community platform.
Analytics and platform improvement: To analyse platform usage, gather insights, and improve the user experience. This may involve tracking user activity and engagement within the community to optimise features, usability, and performance.	Legitimate interests (Article 6(1)(f) GDPR) – the legitimate interest of EIT Urban Mobility in improving its services and ensuring platform effectiveness.
Compliance with legal obligations: To comply with applicable laws and regulations, including data protection regulations and auditing requirements. This may involve processing data for legal reporting or regulatory purposes.	Legal obligation (Article 6(1)(c) GDPR) – processing is necessary for compliance with legal obligations.
Security and fraud prevention: To monitor and maintain the security of the platform, protect against unauthorized access or misuse, and prevent fraud or illegal activities.	Legitimate interests (Article 6(1)(f) GDPR) – the legitimate interest of EIT Urban Mobility in ensuring the security of its platform and protecting against potential misuse.
Marketing and promotional activities: To send marketing materials, newsletters, or updates about EIT Urban Mobility's services, projects, and initiatives, including promotional content related to community activities, unless the User has opted out of such communications.	Consent (Article 6(1)(a) GDPR)

Hivebrite is a platform provided by Kit United SAS. Please note that Kit United, and its subsidiaries – in charge of providing the platform and managing its technical aspects - also collect your personal data as data controller, in order to generate statistics on the use of the platform. This processing is based on the data controller's legitimate interests to improve the platform. The personal data are retained for the duration of the contractual relationship between Kit United and the Data Controller, plus 90 days.

Visibility and Searchability of User Data

As part of the Mobility Innovators community platform, certain personal data you provide, such as your name, organisation and position, contact details, and other profile information including photo, may be visible to and searchable by other members of the platform. This is to enable networking, collaboration, and communication within the community.

Other members, depending on their User Role, will be able to search for you based on criteria such as your name, organisation, or areas of interest, and this may display certain parts of your profile.

The legal bases for processing your data in this manner are **contractual necessity** (Article 6(1)(b) GDPR) and **legitimate interests** (Article 6(1)(f) GDPR) – to facilitate member engagement, communication, and networking within the platform.

Your Control Over Visibility

You have the option to adjust the visibility of your personal data within your profile settings. You can choose which information you wish to make public and searchable by other members. You can update your privacy preferences at any time through the platform's settings.

ARTICLE 3. DATA RETENTION PERIOD

The Data Controller informs the User that the personal data related to the User Account is retained only during the length of the User's registration on the Platform.

Following the termination of said registration, the data collected upon the subscription as well as the content published by the User on the Platform shall be erased within a 90-day period.

We take reasonable security measures to protect your personal data from destruction, loss, modification or any other unauthorised processing. We do not store your personal data for longer than necessary for the purposes for which it is stored. Only authorised personnel from EIT KIC Urban Mobility S.L.U. have access to this data. Third parties that process data on our behalf will do so only on our instructions and where they have agreed to keep it secure.

Your personal data will be stored to fulfil the purpose for which the data are processed only during the strictly necessary time. In the event you withdraw your consent or you object to our use of your personal data, and such objection is successful, we will remove your personal data from our databases. Please note that we will process the personal data necessary to ensure your request.

The foregoing will, however, not prevent us from retaining any personal data-if this is necessary to comply with our legal obligations, in order to file a legal claim or defend ourselves against a legal claim, or for evidential purposes. Such data will no longer be used for regular operations, and access will be restricted to authorised personnel for legitimate purposes only.

ARTICLE 4. DATA TRANSFERS

The User's data are stored in the European Economic Area (EEA) by the Data Controller, and its trusted service providers. When it becomes necessary to transfer personal data to our trusted service providers located in non-European Economic Area (EEA) countries, we implement appropriate measures to ensure the legitimacy and security of these transfers.

These measures include, but are not limited to, entering into data transfer agreements that incorporate the European Commission's Standard Contractual Clauses, conducting rigorous security assessments of our service providers, and ensuring that adequate data protection safeguards are in place.

ARTICLE 5. COMMITMENT OF THE DATA CONTROLLER

The Data Controller commits to processing the User's personal data in compliance with the Data Protection Law and undertake to, notably, respect the following principles:

- Process the User's personal data lawfully, fairly, and in a transparent manner;
- Only collect and process the User's data for the strict purpose as described under article 2 of the present Privacy Policy;
- Ensure that the personal data processed are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Make all efforts to ensure that the personal data processed are accurate and, if necessary, kept up to date, and take all reasonable steps to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- Keep personal User's data for no longer than is necessary for the purposes for which they are processed;
- Put in place all necessary technical and organisational appropriate measures in order to ensure the security, confidentiality, integrity, availability and resilience of the process systems and services;
- Limit access to the User's data to the persons duly authorised to this effect;
- Guarantee to the User their rights under the Data Protection Law in relation to the processing of their data and make the best efforts to satisfy any request, where this is possible.

ARTICLE 6. EXERCISE OF THE USER'S RIGHTS

The User is duly informed that it retains the right at any time, depending on the legal basis of the processing, to access, to rectification, to erasure, to restriction of processing, to data portability, and to object.

To exercise any of your rights, please send us a written request in accordance with this Privacy Policy. We will respond to your request without undue delay, but in any event within one month

of the receipt of the request. In the event of an extension of the term to respond or in the event we do not implement your request, we will notify you, provide an explanation for the delay or rejection, and reference resources available to you.

The right to access: You have the right to confirmation as to whether or not we process your personal data and, in the event we do so, you have the right to access such personal data, together with certain additional information that you also find listed in this Privacy Policy.

You have the right to receive from us a copy of your personal data we have in our possession, provided that this does not adversely affect the rights and freedoms of others. The first copy will be provided free of charge, but we reserve the right to charge a reasonable fee if you request further copies.

The right to rectification: If the personal data we hold about you is inaccurate or incomplete, you have the right to have this information rectified or, taking into account the purposes of the processing, completed.

The right to erasure (right to be forgotten): In some circumstances, you have the right to the erasure of your personal data without undue delay. Those circumstances include:

- (a) The personal data are no longer needed in relation to the purposes for which they were collected or otherwise processed;
- (b) You withdraw your consent, and no other lawful ground exists;
- (c) The processing is for direct marketing purposes;
- (d) The personal data have been unlawfully processed; or,
- (e) Erasure is necessary for compliance with EU law.

There are certain exclusions to the right to erasure. Those exclusions include where processing is necessary,

- (a) for exercising the right of freedom of expression and information;
- (b) for compliance with a legal obligation; or,
- (c) for the establishment, exercise or defence of legal claims.

The right to restrict processing: You have the right to restrict the processing of your personal data (meaning that the personal data may only be stored by us and may only be used for limited purposes), if:

- (a) You contest the accuracy of the personal data, pending the verification of that accuracy;
- (b) The processing is unlawful and you request restriction (as opposed to exercising the right to erasure);
- (c) We no longer need the personal data for the purposes of our processing, but you require personal data for the establishment, exercise or defence of legal claims; or,

(d) You have objected to processing, pending the verification of that objection.

In addition to our right to store your personal data, we may still otherwise process it but only:

- (a) with your consent;
- (b) for the establishment, exercise or defence of legal claims;
- (c) for the protection of the rights of another natural or legal person; or,
- (d) for reasons of important public interest.

We will inform you before we lift the restriction of processing.

The right to data portability: To the extent that the legal basis for our processing of your personal data is consent, and such processing is carried out by automated means, you have the right to receive your personal data from us in a structured, commonly used and machine-readable format. However, this right does not apply where it would adversely affect the rights and freedoms of others.

You also have the right to have your personal data transferred directly to another company, if this is technically possible, and/or to store your personal data for further personal use on a private device.

The right to object to processing: You have the right to object to the processing of your personal data on grounds relating to your particular situation, but only to the extent that the legal basis for the processing is that the processing is necessary for:

- (a) The performance of a task carried out in the public interest or in the exercise of any official authority vested in us;
- (b) The purposes of the legitimate interests pursued by us or by a third party.

If you make such an objection, we will cease to process the personal information unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.

You have the right to object to our processing of your personal data for direct marketing purposes (including profiling for direct marketing purposes). If you make such an objection, we will cease to process your personal data for this purpose.

The right to complain to a supervisory authority: If you consider that our processing of your personal information infringes data protection laws, you have a legal right to lodge a complaint with a supervisory authority responsible for data protection. You may do so in the EU member state of your habitual residence, your place of work or the place of the alleged infringement addressing your claim to the correspondent Supervisory Authority which you can find on the following website:

http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm.

ARTICLE 7. COOKIES

The Data Controller 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 subject to the conditions described in the Data Controller [Cookie Policy](#).

In particular, Hivebrite may use a cookie called “Amplitude”, to enable analytics of the User’s journey on the platform. This cookie involves a transfer of personal data to the United States of America. Hivebrite has signed Standard contractual clauses in order to comply with the requirements of the GDPR on personal data transfer, and will not use this cookie without gathering your consent first.

For more information about the processing carried out by Hivebrite as data controller, the User is invited to consult [Hivebrite’s privacy policy](#).

ARTICLE 8. RECIPIENT AND PERSONS AUTHORIZED TO ACCESS THE USERS’ DATA

Only authorized persons working for the Data Controller can access your personal data. The Data Controller makes its best effort to ensure that these groups of people remain as small as possible and maintain the confidentiality and security of User’s personal data.

The Data Controller also uses trusted service providers to carry out a set of operations on its behalf for hosting. The Data Controller can also use service providers in the tech industry, and editors of specific tools integrated in the Platform for technical purposes.

The Data Controller provides service providers only with the information they need to perform the service, and ask them not to use your personal data for any other purpose. The Data Controller does its best to ensure that all these trusted service providers only process the personal data on our documented instructions and provide sufficient guarantees, in particular in terms of confidentiality, expert knowledge, reliability and resources, to implement technical and organisational measures which will meet the requirements of the applicable legislation, including for the security of processing.

Within our organisation, entities will have access to your data when it is needed to fulfill our contractual or legal obligations, or are allowed to process it based on our legitimate interest. We may transfer your personal data to companies affiliated with us to the extent permitted by the stated purpose or legal basis.

Your personal data may be transferred by us to third parties, provided that you have previously consented to the transfer of data, we are contractually obligated to do so, or there is a legal authorisation to transfer data.

In addition, we may transfer your data to order processors bound by instructions (e.g. IT service providers).

The data passed on may only be processed by the processor on the basis of agreements pursuant to article 28 GDPR and is subject to confidentiality.

The Data Controller may be required to disclose or share your personal data to comply with a legal obligation, or to enforce or apply our terms of use or any other conditions you have accepted; or to protect the rights, safety or property of EIT KIC Urban Mobility S.L.U., its partners or employees.

List of the main service providers:

Service Provider	Service	You can consult the privacy policy by clicking on the following link:
KIT UNITED 5 RUE DES ITALIENS 75009 Paris France	HIVEBRITE solution	https://hivebrite.io/privacy-policy