

# Project for Open Innovation & iNtellectual property (POINT) – Privacy Statement

POINT will provide an empirical basis for existing collaboration models based on Open Innovation and the extent to which intellectual property (IP), including patents, utility models, designs, trade secrets and know-how, facilitates or hinders collaborative innovation.

## Privacy Statement

Protecting your privacy is of the utmost importance to the POINT. POINT is committed to respecting and protecting your personal data and ensuring your rights as a data subject. All data of a personal nature that identifies you directly or indirectly will be handled fairly, lawfully and with due care.

## What is the nature of the processing operation and what do we do with your data?

Within the scope of the POINT project, personal data will be collected from individuals and organisations 1) involved in the interview process – to collect primary data related to the POINT project; 2) invited to attend, or attending the POINT project workshops (interim and final presentation workshops).

We may also use personal data for communication with organisations that have expressed an interest in the project, but have not directly contributed to the data collection activity. This communication will be to provide and make available information on the projects' activities/workshops/results:

- Compile project statistics for project reporting purposes;
- To send you information about the POINT workshop events and publication of project related material such as the final report;
- In addition, you may exceptionally be contacted by our services in very limited instances – e.g. information about an update to the privacy policy, offering collaboration opportunities.

The processing of personal data is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC.

## What personal data do we process?

The categories/types of personal data processed are the following:

- Company name
- Website address
- Type of organization (SME, HEI, PRO or large Entity etc)
- Country of operation
- Sector
- Name and Surname
- Email

## Who is responsible for processing the data?

The data controller of the processing operation is the Head of Unit A.1 COSME, representing the Executive Agency for Small and Medium-sized Enterprises (EASME), which acts under the powers delegated by the European Commission.

For the duration of the POINT project, personal data is collected and processed by IfM Education and Consultancy Services (ECS) the knowledge transfer company for the Institute for Manufacturing (IfM) a division of the University of Cambridge's Department of Engineering.

## Who has access to your personal data and to whom is it disclosed?

Personal data is only accessible by the POINT project team, EASME team and the bodies charged with monitoring or inspection tasks in application of EU law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF)) and other EU institutions and bodies *on a need-to-know* basis. Personal data is not used for any other purposes or disclosed to any other recipient nor third countries or international organisations.

## How do we protect and safeguard your information?

We take appropriate technical and organisational measures to safeguard and protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access.

All personal data related to the projects' procedures is stored in secure IT applications according to the University of Cambridge's security standards, in

specific electronic folders accessible to authorised recipients only. Appropriate levels of access are granted individually only to the abovementioned recipients.

Access is restricted by password-protected under a single sign-on system, connected automatically to the user's ID.

## **How will your personal data be used and reported?**

POINT will provide an empirical basis for existing collaboration models based on Open Innovation and the extent to which intellectual property (IP), including patents, utility models, designs, trade secrets and know-how, facilitates or hinders Open Innovation.

POINT consists of work items, over four main tasks: Planning, Data collection, Analysis and Policy Recommendations.

Commencing in May 2020 POINT will engage with organisations including SMEs, HEIs and PROs in order to collect evidence through interviews.

Taking part is voluntary. You may withdraw from the study at any time and you do not have to give any reasons for why you no longer want to take part.

Personal data such as company names, interviewee names and roles will be recorded interviews – although the collection of such personal data will be optional, and interviewees may elect to remain anonymous. Individuals names and organisation will, unless otherwise requested, be listed in POINT reports as a list of contributors.

Where individuals elect to remain anonymous, as a minimum company type (SME, HEI, PRO, Large Ent), sector and geography will be recorded.

Comments and quotes may also be collected during the interview process – although the provision of such comments or quotes is optional. Where provided, such comments and quotes made during the interview(s), may be recorded, and may be used in project reports and presentation. If comments or quotes are used they will be anonymised, and not attributed to individuals.

For the avoidance of doubt, no commercially sensitive information will be collected. Interviews will not be performed under any form of NDA or confidentiality agreement.

Data from the interviews will be anonymised and grouped according to criteria such as organisation type, industry sector. The POINT project will perform analysis on grouped data in order to identify trends and build recommendations. The anonymised, group data, analysis and trends as well as resulting recommendations will be reported to the EASME and will be made public as a report on the EASME website.

## **How can you access your personal information and, if necessary, correct it? How can you receive your data? How can you request that your personal data be erased, or restrict or object to its processing?**

You have the right to access, rectify, erase, and receive your personal data, as well as restrict its processing or object to the same, as provided in Articles 17 to 24 of Regulation (EU) 2018/1725.

We want to make sure that your personal information is accurate and up to date. You may ask us to correct or remove information you think is inaccurate. You also have the right to have your data completely removed from the POINT project records. To modify or remove your personal information, please send an email to:

Graham Bell  
[gb633@cam.ac.uk](mailto:gb633@cam.ac.uk)

Your request will be answered without undue delay, and in any event within 1 month of receipt of the request. However, according to Article 14(3) of Regulation (EU) 2018/1725, this period may be extended by up to 2 months where necessary, taking into account the complexity and number of requests. The Office will inform you of any such extension within 1 month of receipt of the request, together with the reasons for the delay.

## **What is the legal basis for processing your data?**

Personal data is processed in accordance with Article 5(1)(a) of Regulation (EU) 2018/1725, which states that 'processing is necessary for the performance of a task carried out in the public interest'.

Personal data is collected and processed in accordance with the contract signed between the Project Contracting Authority, namely the Executive Agency for Small and Medium-sized Enterprises (EASME), and IfM Education and Consultancy Services (ECS) the knowledge transfer company for the Institute for Manufacturing (IfM) a division of the University of Cambridge's Department of Engineering.

## **How long can data be kept?**

Personal data will be kept only for the time needed to achieve the purpose for which it is processed.

All data related to the POINT project will be stored by the University of Cambridge, IfM ECS for the duration of the project which is expected to be 12 months from the commencement date in May 2020.

In the event of a formal appeal, all data held at the time of the appeal will be retained until the completion of the appeal process.

## Contact information

Should you have any queries on the processing of your personal data, please address them to the data controller, the Head of Unit A.1 COSME, at:  
[EASME-COSME-IP-CALLS@ec.europa.eu](mailto:EASME-COSME-IP-CALLS@ec.europa.eu)

You shall have right of recourse at any time to the EASME Data Protection Officer at [EASME-DPO@ec.europa.eu](mailto:EASME-DPO@ec.europa.eu) and to the European Data Protection Supervisor at <https://edps.europa.eu>

## Disclaimer

The POINT project is not of a legal or advisory nature and no responsibility is accepted for the results of any actions made on the basis of its services. The content and opinions expressed by the POINT project do not necessarily represent the views of the European Commission and/or the Executive Agency for Small and Medium-sized Enterprises or any other body of the European Union.

Before taking specific actions in relation to IPR protection or enforcement all customers are advised to seek independent advice. Neither the European Commission nor the Agency may be held responsible for the use which may be made of the information contained herein.