# UrbanMind PRIVACY STATEMENT

#### 1. Introduction

UrbanMind and its consortium partners are committed to protecting your personal data and respecting your privacy. The UrbanMind Data Space operates in full compliance with the General Data Protection Regulation (Regulation (EU) 2016/679 – "GDPR") and all relevant European and national data protection laws.

This Privacy Statement explains how we collect, use, and securely store personal data processed through the UrbanMind Data Space, including its associated web portals, data services, and partner interfaces.

The purpose of this Privacy Statement ("Privacy Statement") is to provide clear and transparent information on:

- The reasons and legal bases for processing your personal data
- The methods and safeguards we use to ensure the protection, confidentiality, and integrity of your data
- The rights you have in relation to your personal data; and
- The contact details of the responsible Data Controller, the appointed Data Protection Officer (DPO), and other competent authorities

All processing activities within the UrbanMind Data Space are conducted in accordance with the principles of data minimisation, purpose limitation, transparency, and accountability. The information below describes how personal data is managed within the UrbanMind ecosystem and by its authorized partners.

# 2. Why and how do we process your data?

This Privacy Statement concerns the UrbanMind Data Space, which aims to support data-driven innovation in urban environments by facilitating secure data sharing, analytics, and collaboration between cities, research institutions, and technology partners.

UrbanMind collects and processes your personal data solely for clearly defined and legitimate purposes, including:

- To enable registration and authentication for access to the UrbanMind Data Space and its related services
- To manage user accounts and provide authorized access to datasets, dashboards, and collaboration tools
- To improve user experience through analytics and feedback mechanisms (based on prior consent)
- To communicate updates about UrbanMind activities, events, or platform developments (if the user has opted in)
- To ensure the technical security and integrity of the platform, including access logs and incident management

All personal data processed within the UrbanMind Data Space is obtained directly from you. We do not collect personal data from third parties or external sources.

Your personal data is not used for automated decision-making or profiling. Data processing is performed only to the extent necessary for the operation, maintenance, and continuous improvement of the UrbanMind Data Space, in line with the principles of transparency, proportionality, and purpose limitation.

# 3. On what legal ground(s) do we process your personal data?

We process your personal data because you have given your consent to the processing of your personal data for one or more specific purposes described in this privacy statement, in line with Article 5(1)(d) of Regulation (EU) 2018/1725.

## 4. Which personal data do we collect and process further?

To operate the UrbanMind Data Space and ensure secure access to its services, both personal and non-personal (anonymous) data are collected. Only data that is necessary for user authentication, platform functionality, and reporting purposes is processed. No data is used for advertising or shared with third parties outside the authorized UrbanMind consortium partners.

# For the registration and sign-in section

To create and manage a user account within the UrbanMind Data Space, we collect the following mandatory personal information:

- First name
- Last name
- Username
- Password
- E-mail address
- Country of residence
- Type of user (e.g., individual, organization, research institution, city administration, etc.)

For users participating in UrbanMind pilot projects or requesting access to specific data collections, the following additional information may be collected:

- Organization or company name
- Role within the organization
- Project or pilot name
- User category (e.g., data provider, service developer, city representative)

#### Cookies and analytics data

UrbanMind may collect limited technical data through cookies and analytics tools, subject to prior user consent. This includes browser type, session duration, and anonymized usage statistics to improve platform performance and usability.

#### **Opt-out**

Users may delete their accounts from the UrbanMind Data Space at any time by contacting: urbanmind@riko.si. Once the account removal is confirmed, all associated personal data will be permanently deleted from the system, and the user will no longer have access to restricted areas.

Additionally, users may withdraw their consent at any time regarding the use of their personal data for optional communications or research purposes, without affecting the legality of prior processing.

# 5. How long we retain your personal data

Your personal data is stored only for as long as necessary to fulfil the purposes for which it was collected, in accordance with applicable data protection laws and the operational needs of the UrbanMind Data Space. Retention periods are defined to ensure proportionality and compliance with the principles of data minimisation and storage limitation as set out in Article 5(1)(e) of the GDPR.

In practice, this means that:

- Personal data linked to user registration and authentication is retained for the duration of your active account. Once you delete your account or withdraw consent, the data will be permanently erased within 30 days.
- Data collected for participation in UrbanMind pilot activities, research projects, or collaborative use cases will be retained only for the duration of the project or contractual engagement, and deleted upon its completion unless further retention is required by law.
- Technical logs and system security data are stored for a limited period (typically up to 12 months) for monitoring, auditing, and cybersecurity purposes, after which they are anonymized or deleted.

In all cases, personal data will be deleted or anonymized upon the expiry of the relevant retention period or if the UrbanMind Data Space ceases its operations. Data retention schedules are regularly reviewed to ensure compliance with legal, contractual, and ethical obligations regarding data protection and privacy.

## 6. How do we protect and safeguard your personal data?

All personal data in electronic format (e.g., emails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the contractors. All processing operations are carried out pursuant to Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The data processor(s) are based in an EU Member State and is bound by a specific contractual clause for any processing operations of your data on behalf of UrbanMind, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, UrbanMind and its contractors have put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

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

Access to your personal data is provided to UrbanMind staff and its partner contractors responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff and/or contractors abide by statutory, and when required, additional confidentiality agreements.

Additionally, your personal data will be shared with all UrbanMind partners of the DS4SSCC contract. All Partners are based within the EEA (European Economic Area).

The information we collect will not be given to any other third party, except to the extent and for the purpose we may be required to do so by law, including the possible transmission of personal data to EU bodies or institutions in charge of audit or inspection in accordance with the EU Treaties.

# 8. What are your rights, and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.

You have consented to provide your personal data to the Data Controller for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn the consent.

You can exercise your rights by contacting the Data Protection Officer of the Data Controller. And if necessary, you can also address the European Data Protection Supervisor. All contact information is given under Heading 9 below.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e., their Record reference(s) as specified under Heading 10 below) in your request.

Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

## 9. Contact information

#### The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the UrbanMind Data Protection Officer:

Email: biljana.princic@riko.si

## 10. Where to find more detailed information?

More information can be found at urbanmind.3fs.dev/rulebook