## Privacy Notice for Content Distribution

Name of the Service	Content Distribution
Description of the Service	The EGI Content Distribution service (hereinafter referred to as: "the service" or "Content Distribution") delivers content with scalable, reliable and low maintenance software and data delivery system available as user-space read-only file system.
	This privacy notice describes how we, the EGI Foundation (hereinafter referred to as "we" or "the Data Controller"), collect and process data by which you can be personally identified ("Personal Data") when you use the service.
Data controller	The EGI Foundation Science Park 140
	1098 XG Amsterdam
	The Netherlands.
Data protection officer	The EGI Foundation
	Data Protection Officer
	Science Park 140
	1098 XG Amsterdam
	The Netherlands
	E-mail: dpo@egi.eu
Jurisdiction and supervisory authority	Jurisdiction: NL, The Netherlands
	EGI Foundation's lead supervisory authority is the Dutch Data Protection Authority. They can be contacted at <u>https://autoriteitpersoonsgegevens.nl/en/contact-dutch-dpa/contact-u</u> <u>S</u>

Personal data processed	In addition to any personal data that is transmitted by or stored during the usage of the aforementioned services, the following categories of personal data are processed by EGI Foundation on behalf of the controller as part of providing the services. Identification data: Name Identification number E-mail address Affiliation IP address Certificate Distinguished Name (DN) Behavioural data: Usage data Technical logs with timestamps Data allowing conclusions on the personality: Memberships Roles, groups, VO membership
Purpose of the processing of personal data	<ul> <li>The purpose of the collection, processing and use of the personal data mentioned above is:</li> <li>To provide the service functions, i.e. to allow users to manage and access storage to be used on the resources they can access.</li> <li>To monitor and maintain service stability, performance and security</li> </ul>
Legal basis	The legal basis for processing personal data is: Legitimate interests pursued by the controller or by a third party according to Art. 6 (1) (f) GDPR.

Third parties to whom personal data is disclosed	Personal data will not be used beyond the original purpose of their acquisition. In particular, the data you provide to us will not be used for marketing.
	For the purpose given in this privacy policy, personal data may be passed to the following third parties:
	Within the EU / EEA:
	<ul> <li>Suppliers supporting the user or its community with the provision of computing and storage resources, according to the agreement with the user or its community. A comprehensive list of providers contributing to the federation's resources can be found here: https://www.egi.eu/federation/data-centres/.</li> <li>The records of your use and technical log files produced by the Service components may be shared, via secured mechanisms, for security incident response purposes with other authorised participants in the academic and research distributed digital infrastructures authorised by EGI Foundation governance, only for the same purposes and only as far as necessary to provide the incident response capability where doing so is likely to assist in the investigation of suspected misuse of Infrastructure resources.</li> </ul>
	Outside the EU / EEA:
	<ul> <li>UKRI: resource provider, sub-contracted data processor</li> <li>Suppliers supporting the user or its community with the provision of computing and storage resources, according to the agreement with the user or its community. A comprehensive list of providers contributing to the federation's resources can be found here: <u>https://www.egi.eu/federation/data-centres/</u>.</li> </ul>
	Any data transfer to a third country outside the EU or the EEA only takes place under the conditions contained in Chapter V of the GDPR and in compliance with the provisions of this privacy policy and any related policies adopted by the EGI Federation.

Your rights	<ul> <li>You can exercise the following rights at any time by contacting our data protection officer using the contact details provided in the Data Protection Officer section:</li> <li>Information about your data stored with us and their processing</li> <li>Correction of incorrect personal data</li> <li>Deletion of your data stored by us</li> <li>Restriction of data processing, if we are not yet allowed to delete your data due to legal obligations</li> <li>Objection to the processing of your data by us</li> <li>Data portability</li> <li>You can complain at any time to the supervisory data protection authority (DPA) responsible for you. Your responsible DPA depends on your country and state of residence, of your workplace or of the presumed violation. A list of the supervisory authorities with addresses can be found at https://edpb.europa.eu/about-edpb/board/members_en.</li> <li>You can contact EGI Foundation's lead supervising authority using the contact details provided in the Jurisdiction and Supervisory Authority section.</li> </ul>
Data retention and deletion	The records of your use and technical log files produced by the service components will be deleted or anonymised after, at most, 18 months.
Security	We take appropriate technical and organisational measures to ensure data security and the protection against accidental or unlawful destruction, accidental loss, alteration, unauthorised disclosure or access. A comprehensive overview of the technical and organisational measures taken by EGI Foundation can be found at <u>EGI Documentation</u> <u>Database</u> .
Data Protection Code of Conduct	EGI Foundation is conforming to GEANT Code of Conduct and your personal data will be processed in accordance with the <u>Code of</u> <u>Conduct for Service Providers</u> and the <u>EGI-doc-2732-v3: Policy on the</u> <u>Processing of Personal Data</u> .
	Based on <u>AARC Policy development kit</u> (licenced under <u>CC BY-NC-SA</u> <u>4.0</u> )