

ESRF privacy policy for data processing services



Contents

1. Purpose and scope of the policy	2
2. Collection of general data and information	2
3. Data Controller and contact details	3
4. What personal data do we collect and how?	3
5. Why do we collect your Personal Information and how?	4
5.1 Contact possibility via the website	4
6. Web analysis tool: Data protection provisions about the application and use of Matomo	4
7. Cookies and third-party services	5
8. Do we share your personal data?	5
9. Is your personal data transferred to other countries?	5
10. How long do we keep personal data?	6
11. What are your rights?	6
12. Updating of this policy	7

1. Purpose and scope of the policy

The ESRF attaches the greatest importance and care to the protection of privacy and personal data, as well as to the respect of the provisions of the applicable legislation.

The General Data Protection Regulation (EU) 2016/679 (hereinafter "GDPR") states that personal data must be processed lawfully, fairly, and transparently. Thus, this privacy policy (hereinafter the "Policy") aims to provide you with simple, clear information on the processing of personal data concerning you, in the context of your browsing and the operations carried out on our website.

2. Collection of general data and information

The website and services of the ESRF may collect a series of general data and information when a data subject or automated system calls up the website or services. This general data and information are stored in the server log files. Collected may be:

1. the browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system reaches our website (so-called referrers),
4. the sub-websites,
5. the date and time of access to the Internet site,
6. an Internet protocol address (IP address),
7. any other similar data and information that may be used in the event of attacks on our information technology systems.

When using these general data and information, the ESRF does not draw any conclusions about the data subject. Rather, this information is needed to:

1. deliver the content of our website correctly,
2. optimize the content of our website as well as its advertisement,
3. ensure the long-term viability of our information technology systems and website technology, and
4. provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Therefore, the ESRF analyses anonymously collected data and information statistically, with the aim of increasing the data protection and data security of our institute and services, and to ensure an optimal level of protection for the personal data we process. The anonymous data of the server log files are stored separately from all personal data provided by a data subject.

3. Data Controller and contact details

In the course of your activity on web services, we collect and use personal data relating to you, an individual (hereinafter "Data Subject").

The Controller for the purposes of the General Data Protection Regulation (GDPR), other data protection laws applicable in Member states of the European Union and other provisions related to data protection is:

ESRF - The European Synchrotron
CS40220
38043 Grenoble Cedex 9
France
Telephone: +33 (0)4 76 88 20 00
Fax: +33 (0)4 76 88 20 20

Société civile
RCS Grenoble D 338 723 919
N° Siret 338 723 919 00027 – APE 7219 Z

Email: dpo@esrf.fr

Hosting for the services is provided by the ESRF.

For all the processing activities, the ESRF determines the means and purposes of the processing. Thus, we act as a Processor, within the meaning of the Regulation on personal data, and in particular regulation (EU) 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data.

The services are published by the European Synchrotron Radiation Facility and the information therein are governed by French law.

4. What personal data do we collect and how?

By using our services, you provide us with a certain amount of information about yourself, some of which may identify you ("personal information"). This is the case when you identify yourself, browse our site, or fill in online forms.

The nature and quality of the personal data collected about you will vary depending on the relationship you have with ESRF, the main ones being:

- Identification data: This includes all information that would allow us to identify you, such as your name, first name. We may also collect your e-mail address, as well as your postal address (in case of requests for paper copies of documentation).

- Browsing information: by browsing our website, you interact with it. As a result, some information about your browsing is collected.
- Data collected from Third Parties: Personal Data that you have agreed to share with us or on publicly available social networks and/or that we may collect from other publicly available databases.

5. Why do we collect your Personal Information and how?

We collect your Personal Data for specific purposes and on different legal grounds.

On the basis of your consent, your Personal Data could be processed for the following purposes:

- Management of contacts (e.g. to provide help in case of difficulties encountered using the service)
- Management of cookies requiring your consent.

In the framework of the legitimate interest of ESRF, your data could be processed for the following purposes:

- Establishment of statistics for the improvement of products and services.
- Carrying out satisfaction surveys and polls.

5.1 Contact possibility via the website

The website of the ESRF contains information that enables a quick electronic contact to our institute, as well as direct communication with us, which also includes a general e-mail address. If a data subject contacts the controller by e-mail or via a contact form, the personal data transmitted by the data subject are automatically stored. Such personal data transmitted on a voluntary basis by a data subject to the data controller are stored for the purpose of processing or contacting the data subject. There is no transfer of this personal data to third parties.

6. Web analysis tool: Data protection provisions about the application and use of Matomo

On these services, the controller could have integrated the Matomo component. Matomo is an open-source software tool for web analysis. Web analysis is the collection, gathering and evaluating data on the behaviour of visitors. A web analysis tool collects, inter alia, data on the website from which a data subject came to a website (so-called referrer), which pages of the website were accessed or how often and for which period of time a sub-page was viewed. Web analysis is mainly used for the optimization of a website and the cost-benefit analysis of Internet advertising.

The software is operated on the server of the controller, the data protection-sensitive log files are stored exclusively on this server.

Matomo sets a cookie on the information technology system of the data subject. The definition of cookies is explained on the cookies page. With the setting of the cookie, an analysis of the use of our website is enabled. With each call-up to one of the individual pages of this website, via Matomo component, the Internet browser on the information technology system of the data subject is automatically prompted to submit data for the purpose of online analysis to our server. During the course of this technical procedure, the following information is stored:

- the anonymised ip address of the visitor, i.e with the last 2 bytes masked (e.g. 192.168.xxx.xxx)
- the visitor's operating system (for example Windows, Mac, etc.),
- the date and time of the visit to the site,
- the pages accessed,
- if the visitor follows a link to get to the page, the address (URL) of the page containing the link,
- the type of browser used.

These personal data are stored by us. We do not forward this personal data to third parties.

7. Cookies and third-party services

Please refer to the dedicated [Cookies page](#) for information concerning the use of cookies and third-party services on this website.

8. Do we share your personal data?

We do not share your personal Data.

We do not sell your Data.

9. Is your personal data transferred to other countries?

ESRF strives to keep the personal data in France, or at least within the European Economic Area (EEA).

However, it is possible that the data we collect when you use our platform or services may be transferred to other countries. This is for example the case if some of our service providers are located outside the European Economic Area.

In such an event we guarantee that the transfer of personal data is taking place:

- to a country ensuring an adequate level of protection, i.e. a level of protection equivalent to what the European Regulations require,

- within the framework of standard contractual clauses,
- within the framework of internal company rules.

10. How long do we keep personal data?

We retain personal data only for as long as is necessary to fulfill the purpose for which we hold the data and to meet your needs or our legal obligations.

11. What are your rights?

The GDPR provides Data Subjects with rights that they can exercise. Thus, are provided:

1. Right to information: the right to have clear, precise, and complete information on the use of personal data by ESRF.
2. Right of access: the right to obtain a copy of the personal data that the Data Controller holds on the applicant.
3. Right to rectification: the right to have personal data rectified if they are inaccurate or obsolete and/or to complete them if they are incomplete.
4. Right to erasure / right to be forgotten: the right, under certain conditions, to have the data erased or deleted, unless ESRF has a legitimate interest in keeping it.
5. Right of opposition: the right to object to the processing of personal data by ESRF for reasons related to the particular situation of the applicant (under conditions).
6. Right to withdraw consent: the right at any time to withdraw consent where processing is based on consent.
7. Right to restriction of processing: the right, under certain conditions, to request that the processing of personal data be temporarily suspended.
8. Right to data portability: the right to request that personal data be transmitted in a reusable format that allows it to be used in another database.
9. Right to avoid automated decision-making: the right of the applicant to refuse fully authorized decision-making and/or to exercise the additional safeguards offered in this regard.
10. Right to define post-mortem directives: the right for the applicant to define directives concerning the fate of personal data after his/her death.

Additional rights may be granted by the local regulations to affected Persons.

To this end, ESRF has implemented a procedure for the management of individuals' rights in accordance with the requirements of the applicable legislation. This procedure establishes:

- The standards to be respected to ensure the transparent information of the data subject.
- Legal requirements that must be met.
- The authorized means of applying for each right, depending on the category of persons concerned.
- The business processes for handling these requests in accordance with the above requirements.

- The stakeholders involved in these processes, their roles and responsibilities.

To exercise your rights, you may contact the Data Protection Officer (DPO) through the email address dpo@esrf.fr

When you send us a request to exercise a right, you are asked to specify as far as possible the scope of the request, the type of right being exercised, the Personal Data Processing concerned, and any other useful information, in order to facilitate the examination of your request. In addition, in case of reasonable doubt, you may be asked to prove your identity.

You also have the right to complain to the Commission Nationale de l'Informatique et des Libertés (CNIL), 3 Place de Fontenoy - TSA 80715 - 75334 PARIS CEDEX 07, about the way in which ESRF collects and processes your data.

12. Updating of this policy

This Policy may be updated to reflect changes in the Personal Data Regulations.

Date of last update 02/05/2023