

PLEASE NOTE: THIS POLICY IS A DRAFT AND SUBJECT TO REVISION

03. Policy on the Processing of Personal Information

This policy is effective from 20 January 2025.

Introduction

This policy ensures that data collected because of the use of the CADRE Collaboration is processed fairly and lawfully by Collaboration participants. Some of this data, for example data relating to user registration, monitoring and accounting contains “personal information” as defined by the Privacy Act 1988 (see <https://www.oaic.gov.au/privacy/privacy-guidance-for-organisations-and-government-agencies/handling-personal-information/what-is-personal-information>) . The collection and processing of personal information is subject to restrictions aimed at protecting the privacy of individuals.

Definitions

Definitions that are relevant to more than one policy are contained in the Top Level CADRE Collaboration Policy. Definitions that are relevant only to this policy are included here.

Personal Information - Any information relating to an identified or identifiable natural person.

Processing (Processed) - Any operation performed on Personal Data by the CADRE platform or its administrators, including but not limited to collection and storage.

Scope

This policy covers Personal information that is Processed as a prerequisite for, or because of, an End User’s use of CADRE Collaboration services. Examples of such

Personal Information include registration information, credential identifiers and usage, accounting, security and monitoring records.

This policy excludes Personal Information contained within research datasets uploaded by End Users or by End Users' research communities. Examples of such data are medical datasets which may contain Personal Information.

Policy

By their activity in the CADRE Collaboration, Service Providers:

1. Declare that they have read, understood and will abide by the Principles of Personal Information Processing as set out below.
2. Declare their acknowledgment that failure to abide by these Principles may result in exclusion from the Collaboration, and that if such failure is thought to be the result of an unlawful act or results in unlawful information disclosure, they may be reported to the relevant legal authorities.

Principles of personal information processing

- I. The End User whose Personal Information is being Processed shall be treated fairly and in an open and transparent manner.
- II. Personal Information of End Users (hereinafter "Personal Information") shall be Processed only for those administrative, operational, accounting, monitoring and security purposes that are necessary for the safe and reliable operation of CADRE as the Collaboration service, without prejudice to the End Users' rights under the relevant laws.
- III. Processing of Personal Information shall be adequate, relevant and not excessive in relation to the purposes for which they are Processed.
- IV. Personal Information shall be accurate and, where necessary, kept up to date. Where Personal Data are found to be inaccurate or incomplete, having regard to the purposes for which they are Processed, they shall be rectified or purged.
- V. Personal Information Processed for the purposes listed under paragraph ii above shall not be kept for longer than the period defined in a relevant service policy governing the type of Personal Information record being Processed (e.g. registration, monitoring or accounting) and by default shall be anonymised or purged after a period specified in the Privacy Policy.

Policy Development Kit
Policy on the Processing of Personal Information
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- VI. Appropriate technical and organisational measures shall be taken against unauthorised disclosure or Processing of Personal Information and against accidental loss, or destruction of, or damage to, Personal Information. As a minimum, Collaboration Service Providers shall:
- A. Restrict access to stored Personal Information under their control to appropriate authorised individuals;
 - B. Transmit Personal Information by network or other means in a manner to prevent disclosure to unauthorised individuals;
 - C. Not disclose Personal Information unless in accordance with these Principles of Personal Information Processing;
 - D. Appoint at least one Data Protection Officer (DPO) with appropriate training and publish to the Collaboration a single contact point for the DPO to which End Users or other Collaboration Participants can report suspected breaches of this policy;
 - E. Respond to suspected breaches of this Policy promptly and effectively and take the appropriate action where a breach is found to have occurred;
 - F. Perform periodic audits of compliance to this Policy and make available the results of such audits to other Collaboration Participants upon their request.
- VII. Each Collaboration service interface provided for the End User must provide, in a visible and accessible way, a Privacy Policy containing the following elements:
1. Name and contact details of the Collaboration Participant Processing Personal Information;
 2. Description of Personal Information being Processed;
 3. Purpose or purposes of Processing of Personal Information;
 4. Explanation of the rights of the End User to:
 - a) Obtain a copy of their Personal Information being stored by the Participant without undue delay;
 - b) Request that any Personal Information relating to them which is shown to be incomplete or inaccurate be rectified;
 - c) Request that on compelling legitimate grounds Processing of their Personal Information should cease;
 5. The contact details of the Collaboration Participant's DPO to which the End User should direct requests in relation to their rights above;
 6. Retention period of the Personal Information Processed;
 7. Reference to this Policy.

- VIII. Personal Information may only be transferred to or otherwise shared with individuals or organisations where the recipient:
1. has agreed to be bound by this Policy and the set of common Collaboration policies, or
 2. is part of a recognised Computer Incident Response Team framework and as part of an incident investigation to prevent active or suspected misuse of Collaboration services, or
 3. presents an appropriately enforced legal request.