



SAM4ROB Consortium

Data Management Policy

Last updated: 21.03.2019

Preamble

SAM4ROB is an international consortium with the following members:

- *PPM AS - Norway*
- *BME - Budapest University of Technology and Economics, Faculty of Mechanical Engineering, Department of Mechatronics Optics and Engineering Informatics - Hungary*
- *DGIST - Convergence Research Center for Collaborative Robots, Daegu-Gyeongbuk Institute of Science & Technology - South Korea*
- *DLM Solutions Kft - Hungary*
- *F&P Robotics AG - Switzerland*
- *YUJIN Mechatronics Co., Ltd. – South Korea*

The consortium within the framework of Eurostars E!12433 is conducting a project aimed at creating a safe environment for human – robot coexistence on the factory floor. During the project we will collect the minimum necessary personal data from people involved in the research, development and testing of the product.

This Data Management Policy explains the set of private data we collect and process and the ways we use these data. Each of the consortium partners have their own privacy policies in place as well to ensure your data is protected and handled in accordance with GDPR regulations where applicable and in accordance with the data handling regulations of the country of residence for the specific consortium member.

The consortium appointed a Data Protection Officer (DPO). Here are the contact details for the DPO of the consortium:

Balázs Hámori

Phone: +36 1 8843300

Email: gdpr@sam4rob.com

Postal address: 1033 Budapest, Szőlőkert u 4/B, Hungary

Definitions

„Personal data” means any information which relates to a living, identifiable person. It can include names, addresses, telephone numbers, email addresses, etc. but it is wider than that and includes any other information relating to that person or a combination of information which, if put together, means that the person can be identified.

„Special category data” means personal data about a person’s race, ethnic origin, politics, religion, trade union memberships, genetics, biometrics, health, sex life or sexual orientation.

„Processing” covers all activities relating to the use of personal data by any organization, from its collection through to its storage and disposal and everything in between.

„Data subject” means the person whose personal data is being processed.

Our principles regarding user privacy and data protection

We take the protection of your personal data very seriously. We will only collect and process personal data where absolutely necessary and we make clear at all times why we are doing it and how it will be used.

We will not use your data in any way other than the ones explained to you prior to consent.

We will not share your personal data with any third party outside of this consortium unless legally obliged to do so.

Types of data we collect

Information You share with Us online. If you contact us via our site, we will collect Personal Data from you, such as your first and last name, and e-mail address, as well as any other content included in the e-mail. We may use this information to send you a reply. We may also collect Personal Data at other points in our Site that state that Personal Data is being collected.

If you fill in one of our questionnaires hosted on our website, we will store the personal data provided by you in the questionnaire, like name, email address, position or any other personal data specific to the given online form.

Information You Provide to Us offline. During our project we might have personal meetings with customers or conduct tests in customer facilities. On these occasions we might gather personal data in relation to our queries or on-site equipment tests. You will always be aware of the type and extent of personal data we collect and the rules governing the storage and retention of this data by reading and agreeing to our personal data management consent form and policy.

Information Collected via Technology.

On-site equipment tests. During the project we may collect personal data in relation to our SAM4ROB sensor and system testing in your facilities. During these tests we will collect and store information from the sensors and also may use external video equipment to record the

tests for further analysis. We will never try to connect any personal data collected to a specific person, in other words we never intend to identify the specific person in the data feed or video recordings. Nevertheless this data may be stored in our servers in line with our data management policy.

Information Collected by Our Site. To make our Site more useful to you, our servers (which may be hosted by a third party service provider) collect information from you, including your browser type, operating system, Internet Protocol (IP) address (a number that is automatically assigned to your computer when you use the Internet, which may vary from session to session), domain name, and/or a date/time stamp for your visit.

Log Files. As with most websites the following also applies here. We gather certain information automatically and store it in log files. This information includes IP addresses, browser type Internet service Provider (“ISP”), referring/exit pages, operating system, date/time stamp, and clickstream data. We use this information to analyze trends, administer the Site, track users’ movements around the Site, gather demographic information about our user base as a whole, and better tailor our Site to users’ needs. Except where noted, we do not link this automatically-collected data to Personal Data.

Cookies. We also might use cookies and URL information to gather information regarding the date and time of your visit and the information for which you searched and which you viewed. “**Cookies**” are small pieces of information that a website sends to your computer’s hard drive while you are viewing a web site. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on our Site. Persistent Cookies can be removed by following Internet browser help file directions.

Google Analytics. We use Google Analytics. Google Analytics collects information anonymously and reports website trends without identifying individual visitors. Analytics uses its own cookie to track visitor interactions. Website owners can view a variety of reports about how visitors interact with their website, so they can improve their website and how people find it. Please see the following links for more information about Google Analytics: <http://www.google.com/privacy.html> and <http://www.google.com/analytics/tos.html>.

For what purposes do we use your data?

We limit the purpose of any personal data collected in order to successfully complete our SAM4ROB R&D project. We aim at minimizing the use of personal data by only collecting the minimum scope necessary and delete or anonymize such data as soon as possible.

We use the data collected including your personal data for the following purposes for our SAM4ROB product:

- Market analysis for sales potential
- Development scope analysis
- Industrial testing as part of the product development iteration cycle

Legal basis for our data collection

All our personal data management is based on prior consent from you.

Purpose	Type of data	Legal basis
Market analysis	Identity and contact	Consent
Development scope analysis	Identity and contact	Consent
Industrial testing	Identity, Transactional, Video feed (positional), Communication	Consent

Data retention rules

We will anonymize all your personal data as soon as possible, in most cases immediately after collection as we do not need to be able to identify the specific persons in our project after the data collection is completed. Some of the data we will not be able to delete that are necessary for our R&D activities, like video feed or parts of the communication during industrial testing (e.g. ticketing system data). We will not keep any of your personal data for more than 5 years after the completion of our project, that is after 31.12.2020 plus 5 calendar years.

Third Party Processors of personal data

During the processing of your personal data we might share the data with the following types of third party processors.

- Internet service providers
- Co-location providers (data centers)
- System administration subcontractors
- Other service providers: Google, Dropbox, Skype during our internal project communication

International transfer of your personal data

Based on your consent we will share your data exclusively among the consortium partners listed in the Preamble of this policy, some of them non-EU entities. As stated, all partners have appropriate data management and security policies in place in line with the regulations of their home countries.

We will not share your personal information with any third party other than the data subprocessors listed above without your specific prior consent.

Your legal rights in connection with your data

Under certain circumstances, by law you have the right to:

Request access to your personal data This allows you to ask us for a copy of your data and to check that we are lawfully processing it.

Request correction of your data. This enables you to ask us to correct any incomplete or inaccurate information we hold about you.

Request erasure of your data. This enables you to ask us to delete or remove your data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact us at: gdpr@sam4rob.com. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.

Changes to this Data Management Policy

We will post any modifications or changes to this Privacy Policy on our Site. We reserve the right to modify this Privacy Policy at any time, so we encourage you to review it frequently. The “Last Updated” legend above indicates when this Privacy Policy was last changed.