



Privacy Notice

Of the TENACITY Training Platform



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Privacy Notice

The protection of your personal data is of high importance to TENACITY Consortium, therefore we take all reasonable care to ensure that your personal data is processed according to the General Data Protection Regulation (GDPR) Regulation 2016/679.

When visiting the training platform, you may share your personal data with the TENACITY consortium and the beneficiary partner IANUS Consulting Ltd. (www.ianus-consulting.com), acting as a data controller.

The TENACITY Training Platform is hosted in [Moodle](#).

The privacy policy can be reviewed, if necessary, by the data controller and be updated and re-published on the platform.

1.1 What personal data do we collect from you?

- Platform log data when you use this Platform: including your IP address, the address of the web page you visited, your browser type and settings, the date and time of your access, how you used this platform. We may also collect information about the device you are using to access this platform.
- Information you voluntarily provide in contact forms, registration forms and surveys, including first and last name, email address, site preferences and profile information

1.2 What is your data used for?

Your data is used for the following purposes:

- Platform operationality and Communication:
 - sending e-mail updates: provide you with content related to TENACITY training activities, material and certificates via e-mail;
 - enabling access to training contents and downloads related to TENACITY project (e.g. presentations, reading material, quizzes and evaluation forms etc.);
- Security: guaranteeing the security of this platform.

The provision of your personal data is not optional. Should you decide not to provide your personal data, TENACITY may be unable to provide you with such requested services.

1.2.1 Will data be used for automated-decision making?

Data processed for the purposes of operating the training platform will not be used for automated-decision making.

1.3 What is the legal basis for the processing of your personal data?

In order to carry out the processing activities specified in the previous section, the TENACITY project relies on:

- its legitimate interest of the data controller in securing the platform and in proper communication and exchange of information between you and the TENACITY project;
- your consent, which you can withdraw at any time, without affecting the lawfulness of processing based thereon before its withdrawal, for the processing related to the following activities: the direct emailing of a newsletter to you following registration, if applicable (according to Article 6 par. 1 (a) and (f) GDPR.); access to the training platform and its content; direct contact via email by the platform administrators

1.4 How long do we keep your personal data?

The data we collect to ensure the security of this platform are not kept longer than one year. For the other above-mentioned purposes, your personal data will be kept for the duration of TENACITY's Project and for a 5-year period after its completion (until 31 August 2030, or later if extended) according to Article 20.1 of the TENACITY Grant Agreement. In any case, personal data will be retained no longer as relevant to the purpose of their collection, unless you have explicitly consented to a shorter data retention period.

1.5 Who has access to the personal data and how are they protected?

IANUS Consulting Ltd., as the data controller, is the primary entity with access to your personal data. Access may also be granted to the TENACITY project partners in charge of the training curricula, training activities and living labs, as well as some personnel of third parties, in charge of the hosting and maintenance of the training platform. All such recipients being located within the European Economic Area (EEA).

The Data Controller has implemented 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. For further protection, organisational measures also apply, restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

1.6 What rights do you have, and what does your right of withdrawal include?

Concerning the personal data processed by the TENACITY project, participants have the following statutory rights under the GDPR:

- Right to information according to Art. 15 GDPR.
- Right to access according to Art. 15 GDPR.
- Right to rectification according to Art. 16 GDPR.
- Right to erasure ('right to be forgotten') according to Art. 17 para. 1 GDPR.
- Right to restriction of processing according to Art. 18 GDPR.
- Right to data portability according to Art. 20 GDPR.
- Right to object according to Art. 21 GDPR.
- Right to lodge a complaint with a supervisory authority.

If at any time you wish to learn more about and/or exercise any of the above rights, you should contact: g.anagnostaki@ianus-consulting.com

You are also free to withdraw your consent to the processing of your data at any time without providing a reason for your decision. Your decision to withdraw your consent will not have any negative impact. In the case of withdrawal, personal data will be immediately deleted and no longer be processed by the TENACITY project. Please note that personal information that was

anonymised during the project cannot identify you and, therefore, will not be deleted. For withdrawal, please contact: Samuel Iheanyi Nwankwo nwankwo@iri.uni-hannover.de

1.7 External sites

The training platform may link to external sites (LinkedIn, YouTube, X etc.) that are not operated by us. Please be aware that we have no control over the content and practices of these sites, and cannot accept responsibility or liability for their respective privacy policies. For further information regarding these sites, we strongly suggest you visit each external site's privacy and cookie policies.

1.7.1 Data protection provisions about the application and use of LinkedIn

The Controller has integrated components of the LinkedIn Corporation on this platform. LinkedIn is a web-based social network that enables users with existing business contacts to connect and to make new business contacts.

The operating project consortium of LinkedIn is LinkedIn Corporation, 2029 Stierlin Court Mountain View, CA 94043, UNITED STATES. For privacy matters outside of the UNITED STATES, LinkedIn Ireland, Privacy Policy Issues, Wilton Plaza, Wilton Place, Dublin 2, Ireland, is responsible. With each call-up to one of the individual pages of this platform, which is operated by the controller and on which a LinkedIn component (LinkedIn plug-in) was integrated, the Internet browser on the information technology system of the Data Subject is automatically prompted to the download of a display of the corresponding LinkedIn component of LinkedIn.

LinkedIn receives information via the LinkedIn component that the Data Subject has visited our platform, provided that the Data Subject is logged in at LinkedIn at the time of the call-up to our platform. This occurs regardless of whether the person clicks on the LinkedIn button or not. If such a transmission of information to LinkedIn is not desirable for the Data Subject, then he or she may prevent this by logging off from their LinkedIn account before a call-up to our platform is made. The applicable privacy policy for LinkedIn is available under <https://www.linkedin.com/legal/privacy-policy>. The LinkedIn Cookie Policy is available at <https://www.linkedin.com/legal/cookie-policy>.

1.7.2 Data protection provisions about the application and use of X (formerly Twitter)

On this platform, the controller has integrated components of X. X is a multilingual, publicly-accessible microblogging service on which users may publish and spread so-called 'tweets,' e.g. short messages, which are limited to 140 characters. These short messages are available for everyone, including those who are not logged on to X. The tweets are also displayed to so-called followers of the respective user. Followers are other X users who follow a user's tweets. Furthermore, X allows you to address a wide audience via hashtags, links or retweets.

The operating project consortium of X is X, Inc., 1355 Market Street, Suite 900, San Francisco, CA 94103, UNITED STATES. With each call-up to one of the individual pages of this platform, which is operated by the controller and on which a X component (X button) was integrated, the Internet browser on the information technology system of the Data Subject is automatically prompted to download a display of the corresponding X component of X. The purpose of the integration of the X component is a retransmission of the contents of this platform to allow our users to introduce this web page to the digital world and increase our visitor numbers.

X receives information via the X component that the Data Subject has visited our platform, provided that the Data Subject is logged in on X at the time of the call-up to our platform. This occurs regardless of whether the person clicks on the X component or not. If such a transmission of information to X is not desirable for the Data Subject, then he or she may prevent this by logging off from their X account before a call-up to our platform is made.

The applicable data protection provisions of X may be accessed at <https://twitter.com/en/privacy>.

1.8 COOKIES POLICY

To learn more about Moodle's Cookie Policy, you can access the following link [Policies and agreements | Moodle.org](#)



TENACITY

Travelling Intelligence Against Crime and Terrorism