

## SCIGNE Platform's Cloud Data Privacy Policy

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Authors: The SCIGNE Team

Revision	Changes Made	Date	Author
1.1	Updated format to be compatible with an ISO 9001	10/08/2023	Jérôme Pansanel
	certification		
1.0	Initial release of the document	25/11/2021	Jérôme Pansanel

# Cloud Data Privacy Policy

#### Name and address of the data controller 1.1

Institut Pluridisciplinaire Hubert Curien  $23~\mathrm{rue}$ du loess - BP28 67037 Strasbourg cedex 2 FRANCE

Tel: +33 (0)3 88 10 66 55Web: www.iphc.cnrs.fr

### Name and address of the data protection officer

Éric Kieffer Institut Pluridisciplinaire Hubert Curien  $23~\mathrm{rue}$  du loess - BP28 67037 Strasbourg cedex 2 FRANCE

Tel: +33 (0)3 88 10 66 55

E-Mail: contact.rgpd@iphc.cnrs.fr

You may, at any time, contact our Data Protection Officer directly with any questions or suggestions concerning data protection at our site.

#### 1.3 Purpose of this service

The SCIGNE Cloud is an OpenStack based cloud infrastructure that offers services targeted at cooperating partners. It is operated by the SCIGNE platform, and hosted at the Hubert Curien Pluridisciplinary Institute.

#### Cookies 1.4

The SCIGNE Cloud Dashboard uses cookies. Cookies are text files that are stored in a computer system via an Internet browser. The dashboard needs cookies for its functionality. It would for example not be possible to determine whether a user is logged in or not without the use of cookies.

You may at any time prevent the setting of cookies through this service by means of a corresponding browser setting. Already set cookies may be deleted at any time within your browser or respective other software.

#### Collection of general data and information 1.5

The SCIGNE Cloud Dashboard collects a series of general data and information when you or an automated system call up the website. 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) the Internet service provider of the accessing system, and (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

While you use the SCIGNE Cloud and any related service that is instrumented through it, i.e. the OpenStack Services, several categories of data are stored:

- The data you submit to OpenStack through the dashboard or the API, e.g. by uploading an image.
- Information about the performed operations on the SCIGNE Cloud. They are stored by OpenStack in logfiles and are important to help us to determin the cause of any issue you may encounter or to detect security incidents.

All of this data will be deleted after appropriate retention periods.

#### 1.6 Sharing and Disclosure

Only if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation or lawful requests by public authorities, including meeting national security or law enforcement requirements and applicable law, rule, order, or regulation, (ii) act in urgent circumstances to protect the personal safety of users of the SCIGNE Cloud or the public, or (iii) protect against legal liability, we may share your Personal Data.

### 1.7 Routine erasure and blocking of personal data

We process and store your personal data only for the period necessary to achieve the purpose of storage, or as far as this is granted by the European legislator or other legislators in laws or regulations to which the controller is subject to.

If the storage purpose is not applicable, or if a storage period prescribed by the European legislator or another competent legislator expires, the personal data are routinely blocked or erased in accordance with legal requirements.

### 1.8 Your Rights

You have the following rights in relation to your Personal Data:

- Right of access: You have the right to request information about the data we store about you and any processing of such data.
- Right of rectification: If your Personal Data is incorrect, you are entitled to have it rectified or completed.
- Right of erasure: You may ask us to delete or remove your your Personal Data and we will do so in some circumstances, such as where we no longer need it (we may not delete your data when other constraint prevail over your right to deletion).
- Right to restrict processing: You may ask us to restrict the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of that Personal Data or object to us processing it. We will do it as long as we are not constraint by legal obligations and it does not affect the usability of the SCIGNE Cloud.
- Right to data portability: You have the right to obtain your Personal Data from us that you consented to give us. We will give you your Personal Data in a strutured, commonly used and machine-readable format.
- Right to object: You may ask us at any time to stop processing your Personal Data, and we will do so if we are relying on a legitimate interest to process your Personal Data unless we demonstrate compelling legitimate grounds for the processing.

- Right to withdraw consent: If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time. This will not affect the lawfulness of processing based on your prior consent.
- Right to lodge a complaint with the data protection authority: If you have a concern about our privacy practices, including the way we have handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

In order to exercise any of these rights, please contact the data controller at the above mentioned address at any time.

#### 1.9 Data Retention

The criteria used to determine the period of storage of Personal Data is the respective statutory retention period. After expiration of that period, the corresponding data is routinely deleted, as long as it is no longer necessary for the fulfillment of the contract or the initiation of a contract.

### 1.10 Security

We maintain reasonable and appropriate security measures to protect Personal Data from loss, misuse, unauthorized access, disclosure, alteration, or destruction in light of the risks inherent in processing this information. However, the Internet cannot be guaranteed to be fully secure and we cannot ensure or warrant the security of any information you provide to us. Please keep this in mind when providing us with your Personal Data.

#### 1.11 Update of this Privacy Notice

We may change this Privacy Notice at any time. If we update this Privacy Notice, we will notify you by posting a new privacy notice on this page. If we make any changes that materially change the ways we process or protect your information, we will provide additional notification of the changes. By continuing to use the SCIGNE Cloud or providing us with information following such a replacement Privacy Notice, you agree that you will be deemed to have agreed to be bound by the Privacy Notice as changed. We therefore recommend that you regularly visit the site to keep yourself informed on possible updates.