

Interreg EUROPEAN UNION

North-West Europe

OPIN

European Regional Development Fund



OCEAN POWER INNOVATION NETWORK

Privacy Notice

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1 Introduction

1.1 General statement - We respect your privacy

The Sustainable Energy Authority of Ireland (“SEAI”), as the Lead Partner on behalf of the Ocean Power Innovation Network (“OPIN”) Project, fully respects your right to privacy and is committed to the protection of personal data, in accordance with the provisions of the General Data Protection Regulation.

This privacy notice will give you information on how the Ocean Power Innovation Network (OPIN) Project collects, uses, shares and looks after your personal information.

Personal information, or personal data, means any information about an individual from which that person can be identified. Anything we do with your personal information (from the point at which we collect it until we delete it from our systems) is called **processing**.

This Notice also details the rights available to you in relation to how we hold and use your Personal Data, how to exercise those rights, and what to do if you require more information or wish to make a complaint.

1.2 Who is responsible for your information

SEAI is responsible for your information for the personal data we process. This Notice applies to SEAI, as the Lead Partner on behalf of the OPIN Project a public authority established under the Sustainable Energy Act 2002, located at Wilton Park House, Wilton Place, Dublin 2.

The use of “we”, “us”, “our” and “ours” in this Notice refer to SEAI. For more information about us, please see our About webpage <https://www.seai.ie/about/>.

If you want to get in touch and seek to exercise your rights as described below, please contact us at dataprotection@seai.ie.

1.3 Layout

This privacy notice is provided in a layered format, so you can click through to the specific areas set out below:

- The OPIN Project
- The OPIN Project Partners and Data Protection Officer
- When this privacy notice applies
- Our Legal Bases
- Sharing Your Information
- Consequences of not providing personal information
- OPIN Project activities and how we will collect, use and share personal information
- Security
- Informing us of changes to your personal information
- Your rights
- Complaints
- How long we will keep your personal information

This is the current version of our privacy notice. It was last updated in June 2019.

The OPIN Project website (<http://nweurope.eu/opin>) is not intended for children and we do not knowingly collect personal information relating to children.

It is important that you read this privacy notice together with the privacy notices or fair processing notices associated with the other organisations who are OPIN Project Partners (as outlined in The OPIN Project Partners and Data Protection officer). This privacy notice supplements the other notices and is not intended to override them.

2 The OPIN Project

OPIN Project is a project funded by the European Union under the INTERREG NWE programme.

The Ocean Power Innovation Network (OPIN) is a 3-year initiative, running from 2019 to 2021. The project has a total project budget of €2.6M, with €1.5M in financial support contributed by Interreg North West Europe from the European Research and

Development Fund (ERDF). The project is implemented by a partnership of public-sector organisations from several European countries, led by the Sustainable Energy Authority of Ireland (SEAI).

OPIN is a cross-sectoral collaborative network that aims to accelerate the growth of the ocean energy sector and its supply chains across the partner regions of Ireland, the UK, Belgium, France, the Netherlands and Germany.

The scope of the OPIN project includes:

- wave, tidal stream, floating offshore wind and hybrid offshore renewable energy systems;
- subsystems, components, materials, enabling technologies, installation, operations and maintenance, decommissioning, related processes and services; and
- energy systems and storage solutions, to enable integration of ocean energy.

The basic premise of OPIN is to encourage both cross-sectoral and cross-regional collaboration for Offshore Renewable Energy SMEs. Cross-sectoral collaboration will bring already proven expertise, capabilities and products from other sectors into the ocean energy sector. This will help to reduce costs and accelerate technology development.

The Innovation Support scheme is targeted on small and medium-sized enterprises (SMEs) within the ocean energy sector and the current or potential value chain.

Further information on the OPIN Project and its Project Partners can be found www.nweurope.eu/opin/

3 OPIN Project Partners and Data Protect Officer

3.1 OPIN Project Partners

The partners in the OPIN Project are listed below, together with a link to each partners' organisational privacy notice.

Personal information collected through the OPIN will only be shared as necessary with the other Project Partners.

Partner	Website	Privacy Notice
The Sustainable Energy Authority of Ireland, Ireland	https://www.seai.ie/	https://www.seai.ie/legal-and-privacy/
Scottish Enterprise, United Kingdom	https://www.scottish-enterprise.com/	https://www.scottish-enterprise.com/help/privacy-notice
Offshore Renewable Energy Catapult	https://ore.catapult.org.uk/	http://www.waveandtidalknowledgenetwork.com/pages/privacy-statement.aspx
Sirris	https://www.sirris.be/	https://www.sirris.be/discclaimer
West Atlantic Marine Energy Community	https://www.weamec.fr/en/	https://www.weamec.fr/en/privacy-policy/
Dutch Marine Energy Centre	https://www.dutchmarineenergy.com/	https://www.dutchmarineenergy.com/privacy-policy
Fraunhofer-Gesellschaft zur Förderung der angewandten Forschung e.V.	https://www.iee.fraunhofer.de/	https://www.iee.fraunhofer.de/en/data_protection.html

Table 3.1: OPIN Project Partners Privacy Notices

1.4 Data Protection Officer

For Data Protection Law, each of the OPIN Project Partners and associated organisations, as listed above, are the controllers of personal data they process. However, SEAI will act as the main point of contact for individuals. SEAI has appointed a data protection officer who is responsible for overseeing questions in relation to OPIN project and this privacy notice. If you have any questions about the privacy notice, including any requests to exercise your legal rights in respect of your personal information, please contact the data protection officer using the details below.

Data Protection Officer

Sustainable Energy Authority of Ireland
Wilton Park House
Wilton Place
Dublin 2
D02 T228

Email: dataprotection@seai.ie

Tel: +353-1-8082100

Fax: +353-1-8082002

4 When this privacy notice applies

This privacy notice applies to any and all OPIN activities, and includes without limitation:

- When you book an OPIN event via Eventbrite or other registration systems and / or attend any of our events
- When you send an enquiry to OPIN@seai.ie
- When you have asked to receive information and updates in relation to the OPIN project
- When your employer is part of a consortium applying for support for a research and development project under an OPIN Call
- When your personal data is included as part of an OPIN case study in a publication or on the website
- When you are an evaluator invited by OPIN to review project proposals submitted under OPIN Calls

To help you better understand how the OPIN Project Partners will process personal data, each of the activities are detailed further in [OPIN Project activities and how we will collect, use and share personal information](#).

5 Information You Give Us About Other People

If you provide information to us about any person other than yourself, you should ensure that you have a legal basis for doing so and that you have complied with your transparency obligations under data protection law.

6 Our Legal Bases

Data protection law says that we must have legal grounds in order to process your personal information. These are known as lawful grounds. There are six lawful grounds. For OPIN Project Partners, the lawful grounds relied upon to process personal data includes:

- i. the performance of task carried out in the public interest or in the exercise of official authority.
- ii. necessary for the performance of a contract with you, such as the Innovation Support Agreement;
- iii. necessary in order to take steps at your request prior to entering into a contract with you; or
- iv. necessary for compliance with a legal obligation that applies to us.

Further information can be found in the privacy notices for each organisation. Links are provided in the [OPIN Project Partners and Data Protection Officer](#) section.

7 Sharing Your Information

Personal information will be shared by the OPIN Project Partners who are involved in an OPIN Call (as detailed above in the OPIN Project Partners and Data Protection Officer section).

If your personal information is provided in connection with an application for support submitted under an OPIN Call, the personal information provided will also be shared within the OPIN Steering Group, which includes a representative from each of the OPIN Project Partners, to review the application.

The information may be shared with the funding organisation, Interreg North West Europe, European Commission, the European Court of Auditors and any national audit authorities for the purposes of reporting on the OPIN project, audit and compliance.

Where required to do so by law, we may also share your information with law enforcement agencies.

In the course of administering the OPIN Project, we may share information with various other third parties, as set out below. We do this based upon the legal bases and exceptions mentioned in section 6 of this Notice.

- **Service Providers:** We may share your Personal Data to help us administer the Project and communicate with you. Categories of service providers include companies who provide IT software and hosting providers and records-storage companies. Where such third parties are processors, these third parties are contractually required to use it only to provide their service to us and are contractually barred from using it for their own purposes.
- **Experts, advisors, lawyers and others connected to the administration of the OPIN Project:** We share your information with a variety of third parties, so we can administer the OPIN Project. This may include sharing your information with advisers, solicitors and law firms, and other experts.
- **Legal and safety reasons:** We may retain, preserve, or share your information if we have a good-faith belief that it is reasonably necessary to (a) respond, based on applicable law, to a legal request (e.g., a subpoena, search warrant, court order,

or other request from government or law enforcement agency); (b) detect, investigate, prevent, and address fraud and other illegal activity, security, or technical issues; (c) protect our rights, property, or safety; (d) enforce the Grant Agreement or any other contracts we have with you or a third party which relates to you; (e) prevent physical injury or other harm to any person or entity, including you and members of the public.

- **Research:** We may include your Personal Data in research studies to assess the impact and benefits of the OPIN Project. The outcome of these studies may be published, or we may publish individual case studies. However, we will ensure that you will not be identifiable in any such studies, without your consent, which will be separately obtained.

8 Consequences of not providing personal information

OPIN Project Partners require personal information to deliver, manage and monitor all activities of the OPIN project. If you do not provide the OPIN Project Partners with personal information, we will be unable to provide you with the services of the OPIN project. You will still be able to access the OPIN website and the information contained within it.

9 OPIN activities and how personal information is used

The OPIN project delivers the following activities:

- Provide a Technology Assessment Process (TAP) support to an SME, selected through an OPIN Call
- Provide support to a group of organisations, in a Collaboration Innovation Group (CIG), participating in a Collaboration Innovation Project (CIP) selected through an OPIN Call
- Provide Travel support to an SME to attend an OPIN event (Workshop, Masterclass, Symposium or CIG meeting) selected through OPIN Call
- monitoring of the effect of a TAP on the recipients
- monitoring the effect of CIP on the members of the CIG who received support
- organising events and activities to communicate the work of the project and promote knowledge exchange

- communication activities, including the project website, newsletters, other publications

9.1 Personal information we collect

The OPIN Project Partner will collect, use, store and share different kinds of personal information about you. To help you identify these, they have been grouped together as follows:

- **Identity data:** title, forename, surname, job title, work experience relevant to participation in an OPIN activity
- **Contact data:** email address, telephone number, employer's name, address
- **Requirements data:** dietary requirements, accessibility needs
- **Enquiry data:** enquiries related to the OPIN project
- **Marketing data:** your preferences in receiving information and updates related to the OPIN project

There is also other information that we collect, use, store and share that is not personal information, including: -

- **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal information but is not considered personal information in law as this data does not directly or indirectly reveal your identity. However, if we combine or connect Aggregated Data with your personal information so that it can directly or indirectly identify you, we treat the combined data as personal information, which will be used in accordance with this privacy notice.
- **Anonymised Data** is the process of turning personal information into a form which does not identify individuals and where identification is not likely to take place.
- **Company Data** is any information relating to a company, such as the company's address, financial information, business plans (although these may contain elements of personal information), methodologies, project briefs etc.

Further details on the activities we deliver, and personal information we collect in relation to each activity is set out below.

9.1.1 Enquiries, Events

9.1.1.1 Enquiries

Personal information we collect

The following types of personal data may be collected if you submit an enquiry or register for an event:

- Contact data
- Enquiry data
- Marketing data

How we collect personal information

Personal information will be collected:

- Directly from you when you:
 - submit an enquiry to OPIN
- From your employer if they:
 - submit an enquiry in which you are copied / mentioned
 - nominate you as a contact person for the organisation

How we will use personal information

- To process any enquiries which you may submit to OPIN
- To provide you with updates / information you have asked for
- To invite you to participate in any events or activities delivered by OPIN
- For monitoring and evaluating the activities delivered by OPIN

9.1.1.2 Events

OPIN events include, but are not limited to, workshops, masterclasses, symposiums, and CIG meetings.

Personal information we collect

The following types of personal data may be collected if you register for an event:

- Contact data
- Identity data
- Requirements data
- Marketing data

How we collect personal information

Personal information will be collected:

- Directly from you when you:
 - register for and / or attend a meeting or event
- From your employer if they:
 - sign you up for an event on your behalf

How we will use personal information

- To register you to attend OPIN events
- To ask if you have any specific requirements (e.g. dietary, access) so that we can try to ensure these are addressed
- To manage bookings, including notifying you of changes or cancellations
- For monitoring and evaluating the activities delivered by OPIN
- To maintaining our records and audit trail for verification of OPIN activity and expenditure, in relation to the European Research and Development Funding of the project, European and national regulations and the audit and reporting obligations of the OPIN Project Partners

9.1.2 OPIN Calls

9.1.2.1 Applications submitted for support under OPIN Calls:

Personal information we collect

The following types of personal data will be collected as part of an application to an OPIN Call:

- Identity data
- Contact data

How we collect personal information

Applications for Collaborative Innovation Projects (CIPs) submitted to an OPIN Call are submitted by the lead applicant on behalf of a Collaborative Innovation Group, to OPIN@seai.ie. Individual companies can also submit applications for Technology Assessment Process (TAP) or Travel support to OPIN@seai.ie. When submitting an application, the applicant is required to provide information on themselves and, in the case of a CIP, information on the partners involved in the CIG. This will include personal information for the main contact person for each partner in the project and may include personal information for individuals who will be involved in project implementation.

For projects submitted and approved under an OPIN Call, your personal information could come from the following sources:

- Directly from you when you:
 - submit an application for support under an OPIN Call
 - participate in a Collaboration Innovation Group which applies for support under an OPIN Call
 - participate in a CIP which receives support under an OPIN Call
 - provide information required for communication and monitoring of a CIP or TAP approved for support under an OPIN Call

- From your employer if they:
 - submit an application or are a consortium partner in a CIP under an OPIN Call
 - participate in a CIP which receives support under an OPIN Call
 - provide information required for communication with and monitoring of a CIP or TAP approved under an OPIN Call

- From the lead applicant of a CIP if they:
 - submit an application for support of a CIP under an OPIN Call on behalf of a CIG in which you and/or your employer have agreed to be a partner
 - receives support under an OPIN Call on behalf of a CIG in which you and/or your employer have agreed to be a partner
 - provide information required for communication with and monitoring of a CIP approved under an OPIN Call in which you and/or your employer have agreed to be a partner

How we will use personal information

The OPIN Project Partners and associated organisations involved in a Call will use your personal information for the following purposes:

- As a point of contact for the application
- For processing and evaluation of applications for support under OPIN Calls:
 - Applications will be appraised by OPIN Project Partners to check eligibility under the OPIN Call eligibility criteria
 - Applications will be reviewed by the OPIN Steering Group, which is comprised of a representative from each of the OPIN Project Partner organisations. The OPIN Steering Group will have access to personal data contained in application submitted to the email address OPIN@seai.ie.
- For monitoring and reporting on support approved under OPIN Calls
- To provide your contact details for information about CIP approved for support under an OPIN Call, including on our website and in publications, but only if you have given written consent for us to do so
- For monitoring and evaluating the activities delivered by OPIN
- To maintain our records and audit trail for verification of OPIN Project activity and expenditure, in relation to the European Research and Develop Funding of the project, European and national regulations and the audit and reporting obligations of the OPIN Project Partners

9.1.3 Feedback and Surveys

Personal information we collect

- Identity data
- Contact data

How we collect personal information

- Directly from you when you:
 - provide feedback
 - complete a survey

How we will use personal information

- To send you feedback forms and collect your comments about OPIN activities

- To request and collect your input to any surveys or research which may be carried out by OPIN to evaluate our activities or plan for future activities
- To analyse feedback and survey responses and produce reports. Note: The data included in reports will be aggregated and anonymised, unless you give us specific written consent to publish a comment.
- For monitoring and evaluating the activities delivered by OPIN
- To maintain our records and audit trail for verification of OPIN activity and expenditure, in relation to the European Research and Develop Funding of the project, European and national regulations and the audit and reporting obligations of the OPIN Project Partners

10 Security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. Where we use third party providers such as Eventbrite and Survey Monkey, we have ensured that they too have such appropriate security measures. In addition, our employees, agents, secondees and suppliers will only process personal information on our instructions and in accordance with this privacy statement. They are also subject to a duty of confidentiality.

11 Informing us of changes to your personal information

It is important that the personal information that we hold about you is accurate and current. Please let us know if your personal information changes during your relationship with us, by contacting us using the details below:

OPIN Project

Sustainable Energy Authority of Ireland
Wilton Park House
Wilton Place
Dublin 2
D02 T228
Email: OPIN@seai.ie
Tel: + 353 (0)1 8082092

12 Your rights

You have a number of rights in relation to your information that we process. These rights are subject to a number of exceptions under law.

To exercise these rights, please contact us at dataprotection@seai.ie.

12.1 Access to your information

You have the right to request a copy of the personal information about you that the OPIN Project Partners hold, in relation to OPIN activities and interactions. You can do so by contacting SEAI or the relevant partner.

12.2 Correcting your information

The OPIN Project Partners want to make sure that your personal information is accurate, complete and up to date and you may ask us to correct any personal information about you that you believe does not meet these standards.

12.3 Deletion of your information

You have the right to ask the OPIN Project Partners to delete personal information about you where:

- You consider that the OPIN Project Partners no longer require the information for the purposes for which it was obtained
- OPIN Project Partners are using the information with your consent and you have withdrawn your consent – see *Withdrawing consent to use your information* below
- You have validly objected to the use of your personal information by the OPIN Project Partners – see *Objecting to how we may use your information* below
- The use of your personal information by the OPIN Project Partners is contrary to law or their other legal obligations

12.4 Restricting how we may use your information

In some cases, you may ask us to restrict how we use your personal information. This right might apply, for example, where we are checking the accuracy of personal

information about you that we hold or assessing the validity of any objection you have made to the use of your information by the OPIN Project Partners.

The right might also apply where OPIN Project Partners no longer have a basis for using your personal information, but you don't want them to delete the data. Where this right to restrict is validly exercised, the OPIN Project Partners may only use the relevant personal information with your consent, for legal claims or where there are other public interest grounds to do so.

12.5 Objecting to how we may use your information

You have the right at any time to require the OPIN Project Partners to stop using your personal information to keep you informed about OPIN activities. In addition, where the OPIN Project Partners use your personal information to perform tasks carried out in the public interest or in exercising official authority vested in it then, if you ask them to, they will stop using that personal information, unless there are overriding legitimate grounds to continue.

12.6 Withdrawing consent to use your information

Where OPIN Project Partners use your personal information with your consent you may withdraw that consent at any time and the OPIN Project Partners will stop using your personal information for the purpose(s) for which consent was given.

Please contact SEAI or the OPIN Project Partner in your country / region in any of the ways set out in the [Contact information and further advice](#) section if you wish to exercise any of these rights.

12.7 Automated processing

If OPIN Project Partners use your personal information in relation to OPIN on an automated basis to make decisions which significantly affect you, you have the right to ask that the decision be reviewed by an individual within the OPIN Project Partners to whom you may make representations and contest the decision. This right only applies

where OPIN Project Partners uses your information with your consent or as part of a contractual relationship with you.

13 Complaints

OPIN Project Partners seek to resolve directly all complaints about how they handle personal information, but you also have the right to lodge a complaint with the Irish Data Protection Commissioner's Office, whose contact details are as follows, or equivalent organisations in any of the OPIN project partner countries.

Data Protection Commission

21 Fitzwilliam Square South

Dublin 2

D02 RD28

Ireland

Phone: +353 578 684 800 or +353 761 104 800

Website: <https://www.dataprotection.ie/en/contact/how-contact-us>

14 How long we will keep your personal information

We may retain your information for as long as necessary in light of the purposes set out in this Notice, including for the purposes of satisfying any legal, accounting, or reporting requirements and, where required for SEAI to assert or defend against legal claims, until the end of the relevant retention period or until the claims in question have been settled.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your Personal Data, the purposes for which we process your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. We also consider regulatory guidance, as appropriate.

The OPIN project is funded by Interreg North West Europe under subsidy contract NWE768. European regulations and the grant agreement require that the OPIN Project

Partners retain information to verify the eligibility of activity and expenditure carried out by the project. All relevant information must be retained for verification and audit purposes until 3 years after the final payment of EU funding. In addition, State Aid information, De Minimis Self-declarations Forms, collected during the application for support to the project, selected through OPIN Calls is provided under European State aid legislation, which specifies the periods of time for which we must keep documentation relating to funding and support we have granted. This may be up to 10 years from the date of the end of the State aid scheme.

15 Amending This Privacy Notice

From time to time, we may amend this Notice. This might happen, for example, where we make changes to the project activities. If we make material changes to the Notice, we will take steps to notify you, such as by posting a notice on our website. The Notice was last updated at the date indicated further below.

16 Contact information and further advice

If you want to exercise your rights (described above), or if you have any questions about this Notice, please contact us as follows:

Data Protection Officer

Sustainable Energy Authority of Ireland
Wilton Park House
Wilton Place
Dublin 2
D02 T228

Tel: +353-1-8082100

Email: dataprotection@seai.ie

You can also contact any of the OPIN Partners using the contact details provided on the home page of our website: www.nweurope.eu/opin

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