



EUROPEAN COMMISSION

## PROTECTION OF YOUR PERSONAL DATA

*This privacy statement provides information about the processing and the protection of your personal data*

**Processing operation:** Privacy statement on the protection of personal data in relation to the “EU Defence Innovation Scheme (EUDIS) Hackathons and Mentoring Programme 2025 website and IT Tools”

**Data Controller:** European Commission, Directorate General for Defence Industry and Space – Unit A.3 EDF Implementation, Defence Technologies and Innovation [“DG DEFIS Unit A.3” or the “Data Controller”], [DEFIS-A3@ec.europa.eu](mailto:DEFIS-A3@ec.europa.eu)

**Record reference:** [DPR-EC-25709.1](#)

## Table of Contents

<b>1.</b>	<b>INTRODUCTION .....</b>	<b>3</b>
<b>2.</b>	<b>WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA? .....</b>	<b>3</b>
<b>3.</b>	<b>ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA? .....</b>	<b>4</b>
<b>4.</b>	<b>WHICH PERSONAL DATA DO WE COLLECT AND FURTHER PROCESS? .....</b>	<b>4</b>
<b>5.</b>	<b>HOW LONG DO WE KEEP YOUR PERSONAL DATA? .....</b>	<b>6</b>
<b>6.</b>	<b>HOW DO WE PROTECT AND SAFEGUARD YOUR PERSONAL DATA? .....</b>	<b>6</b>
<b>7.</b>	<b>WHO HAS ACCESS TO YOUR PERSONAL DATA AND TO WHOM IS IT DISCLOSED? .....</b>	<b>7</b>
7.1.	International transfers.....	7
7.2.	Cookies.....	8
7.3.	Third party IT tools, including Social Media.....	8
<b>8.</b>	<b>WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM? .....</b>	<b>9</b>
<b>9.</b>	<b>CONTACT INFORMATION .....</b>	<b>9</b>
9.1.	The Data Controller.....	9
9.2.	The Data Protection Officer (DPO) of the Commission .....	9
9.3.	The European Data Protection Supervisor (EDPS).....	9
<b>10.</b>	<b>WHERE TO FIND MORE DETAILED INFORMATION? .....</b>	<b>10</b>

## 1. INTRODUCTION

- a) The European Commission (hereafter 'the Commission') is committed to protect your personal data and to respect your privacy. The Commission collects and further processes personal data pursuant to [Regulation \(EU\) 2018/1725](#) of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (repealing Regulation (EC) No 45/2001).
- b) This privacy statement explains the reason for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer and the European Data Protection Supervisor.
- c) The information in relation to processing operation EU Defence Innovation Scheme (EUDIS) Hackathons and Mentoring "EU Defence Innovation Scheme (EUDIS) Hackathons and Mentoring Programme 2025 website and used IT tools" undertaken by DG DEFIS Unit A.3 is presented below.

## 2. WHY AND HOW DO WE PROCESS YOUR PERSONAL DATA?

- a) The Data Controller processes your personal data to:
  - Provide data subjects access to and use of the EUDIS Hackathons and Mentoring website: <https://eudis-hackathon.eu/> and to improve your experience on the website;
  - Enable data subjects to apply to become hackathon and mentoring programme experts and mentors on the website;
  - Enable data subjects to apply to become hackathon local organisers through the Evaluation Management System platform;
  - Register data subjects on the EUDIS Hackathon platform (hosted on TAIKAI – Hackathon Platform [TAIKAI – Hackathon Platform](#)), and assess their eligibility for accessing the platform and participating in related activities;
  - Enable data subjects to participate as speakers, experts, mentors, moderators,
  - stakeholders, and logistical support, as part of each central and local EUDIS Hackathon programme and agenda;
  - Establish and manage a database of participants to the virtual and/or physical events and check the participants' eligibility to attend those events which are organised by DG DEFIS in the context of the EUDIS Hackathons and Mentoring; and
- b) The public IT website [<https://eudis-hackathon.eu/>] and the related IT Tools may contain personal data in the form of contact details and photos of events. This website does not collect personal data via cookies. The restricted <https://taikai.network/> IT Collaborative Platform allows registration to the Hackathon event and contains invitations to meetings, related minutes and follow-up, common actions, useful information, and contact

information of EU Member States. Users access to the restricted collaborative platform via login identification prior the approval of the Data controller and data processors.

c) Your data will not be used for an automated decision-making, including profiling.

### 3. ON WHAT LEGAL GROUND(S) DO WE PROCESS YOUR PERSONAL DATA?

a) We process your personal data based on your consent, which you have provided through a clear affirmative act by ticking the consent box on the online registration form in the restricted IT Collaborative Platform (<https://taikai.network/>), or by signing the consent form during the EUDIS hackathon:

- For the public IT website (<https://eudis-hackathon.eu/>), you have consented to the processing of your personal data by agreeing to participate in the EUDIS Hackathon and Mentoring Programme.
- For the restricted IT Collaborative Platform (<https://taikai.network/>), you have given consent by registering for the Hackathon and using the platform to access meeting invitations, minutes, follow-up actions, shared documents, and contact details of EU Member States.

b) Your consent can be withdrawn at any time by cancelling your registration in the IT Tool or by contacting the Data Controller: European Commission, Directorate-General for Defence Industry and Space, Unit A.3 EDF Implementation Defence Technologies and Innovation at [DEFIS-A3@ec.europa.eu](mailto:DEFIS-A3@ec.europa.eu) or the Data Processor: Civitta International at [info@civitta.com](mailto:info@civitta.com)

### 4. WHICH PERSONAL DATA DO WE COLLECT AND FURTHER PROCESS?

In order to carry out this processing operation, the Data Controller processes the following categories of personal data:

a) Personal data obtained from the data subject through the use of the EUDIS Hackathons and Mentoring website:

- IP address and/or Device ID of the device used to access the website.

b) Personal data obtained from the data subject through the use of the Evaluation Management System platform application form to become a local organiser:

- First name
- Last name
- Email address
- Phone number
- Any other personal data included in the application documents submitted by the applying local organisers, such as the application form, staff biographies, etc.

c) Personal data obtained from the data subject through the use of the embedded website application form to become a mentor or expert:

- First name
- Last name
- Email address
- Phone number
- Citizenship and country of residence
- Spoken languages
- Current affiliation (organisation and role/title)
- Biography including expertise and industry knowledge
- Links to social media or website

d) Personal data obtained from the data subject through the use of the embedded website application form to become a hackathon participant:

- First name
- Last name
- Email address
- Other details necessary for platform access only, such as: Country of residence; City of residence

e) Personal data obtained from the data subject through the use of the embedded website application form for your registration to participate in the EUDIS Hackathon Weekends, either as participant or speaker, expert, mentor, Selection Board member, stakeholder, etc:

- First name
- Last name
- Gender
- Email address
- Telephone number
- Nationality
- Country of residence
- Birthdate
- Current affiliation (profession, organisation, and role/title)
- Profile picture (optional)
- Personal social media links (optional)
- Skills (optional)
- Experience in the defence sector (optional)

- Biography (optional)
- Hackathon location you are planning to register to
- Confirmation of joining physically
- Discord username (optional)

f) Personal data obtained from the data subject through the use of the embedded website application form for your registration to participate in other events, such as informative webinars and meetings for the EUDIS Hackathon:

- First name
- Last name
- Email address
- Current affiliation (organisation and role/title)

## 5. HOW LONG DO WE KEEP YOUR PERSONAL DATA?

The Data Controller only keeps your personal data for the time necessary to fulfil the abovementioned purposes. For each of the categories of personal data that is processed, please find below the retention details:

- a) Authentication data will be kept in the IT system for the duration of your participation in the group;
- b) Audio-visual recordings obtained from the data subject through the use of the embedded website application form will be kept for 3 months after the meeting or event before being deleted. More information is available in the Record of Processing DPR-EC-01937 (Audio-visual recording of meetings);
- c) The optional data mentioned above can be deleted at any moment upon your request, as it is not necessary for getting access to the platform itself;
- d) In case the group or the IT tool are permanently discontinued, all data will be pseudonymised and kept for a maximum of 5 years; and
- e) Selected service providers for organisational purposes (such as caterers, travel agents, or event management organisations) are contractually bound to process personal data on behalf of and in line with the instructions of the data controller, keep confidential any data they process, and protect it from unauthorised access, use, and retention.

## 6. HOW DO WE PROTECT AND SAFEGUARD YOUR PERSONAL DATA?

- a) All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the European Commission or of its contractors. All processing operations are carried out pursuant to the [Commission Decision \(EU, Euratom\) 2017/46](#) of 10 January 2017 on the security of communication and information systems in the European Commission.

- b) The Commission's contractors are bound by a specific contractual clause for any processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the transposition of the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).
- c) In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. 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. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

## 7. WHO HAS ACCESS TO YOUR PERSONAL DATA AND TO WHOM IS IT DISCLOSED?

- a) Access to your personal data is provided to the Commission staff responsible for carrying out this processing operation and to authorised staff according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.
- b) Where necessary, we may also share your information with the following contractors part of the consortium or the local hackathon you have applied to for the purposes of evaluation and processing of your application, sending you deadline reminders and other important information, inviting you to the hackathon or rejecting your application, if invited sending you onboarding information, information during the hackathon and post-event information;
- c) Data processor:  
Civitta International OÜ (Estonia) as the prime contractor of the consortium for EUDIS Hackathons and Mentoring and collector of the personal data;
- d) Sub-processors:
  - Consultores de Automatización y Robótica, S.A. (Spain) as consortium member;
  - Conception, etudes et cooperation de formation (Belgium) as consortium member;
  - Sihtasutus Tallinna Teaduspark Tehnopol (Estonia) as consortium member;
  - The local EUDIS hackathon organizations (also legally established in the EU and/or Norway) behind a specific hackathon location and their related partners;
  - TAIKAI S.A. (Portugal) which provides the hackathon platform used for the registration for and to manage the organisation of the hackathon and its related events, namely the EUDIS Hackathon Weekend.
- e) The photos, videos, and other audio-visual recordings of the events on the EUDIS Hackathons & Mentoring to be used for the promotion of the EUDIS Hackathons & Mentoring on the EUDIS Hackathons & Mentoring website (<https://eudis-hackathon.eu>), DG DEFIS's and contractors' social media channels (Facebook, Instagram, LinkedIn, X and YouTube) and other websites of DG DEFIS, subject to the explicit consent of every participant.

## 7.1. International transfers

- a) No transfer of your data outside of EU countries, including Norway, is foreseen for this activity. Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.
- b) The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

## 7.2. Cookies

- a) Cookies are small text files that are used to store small pieces of information. They are stored on your device when the website is loaded on your browser. These cookies help to make the website function properly, make it more secure, provide a better user experience, understand how the website performs, and analyse what works and where it needs improvement.
- b) The EUDIS Hackathon website (<https://eudis-hackathon.eu/>) does not use any cookies.
- c) Registration for the IT Tools takes place via TAIKAI <https://taikai.network/>, which employs cookies as described here: <https://taikai.network/en/privacy>
- d) Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the event website may not work as intended. The cookie-related information is not used to identify data subjects personally. These cookies are not used for any purpose other than those described here.

## 7.3. Third party IT tools, including Social Media

We use third party IT tools to inform about and promote the EUDIS hackathon and Mentoring Programme through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

- a)
- b) You may be able to watch our videos, which may also be uploaded to one of our social media pages, and follow links from our website to other relevant social media.
- c) In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or “play” on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.
- d) In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties’ specific Terms and Conditions, including their cookie policies, over which the Commission has no control.
- e) We recommend that users read the relevant privacy policies of [Twitter](#), [LinkedIn](#), [Instagram](#), [YouTube](#), carefully before using them. These explain each company’s policy of

personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

- f) The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

## 8. WHAT ARE YOUR RIGHTS AND HOW CAN YOU EXERCISE THEM?

- a) You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, in particular the right to access, rectify or erase your personal data and the right to restrict the processing of your personal data. Where applicable, you also have the right to object to the processing or the right to data portability.
- b) You have the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a), on grounds relating to your particular situation.
- c) You have consented to provide your personal data to the data controller for the present processing operation. You can withdraw your consent at any time by notifying the data controller European Commission, Directorate-General for Defence Industry and Space, Unit A.3 EDF Implementation Defence Technologies and Innovation at DEFIS-A3@ec.europa.eu or the data processor Civitta International, at info@civitta.com.
- d) The withdrawal of your consent will not affect the lawfulness of the processing carried out before you have withdrawn the consent.
- e) You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Heading 9 below.
- f) Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. their Record reference(s) as specified under Heading 10 below) in your request.
- g) Any request for access to personal data will be handled within one month. Any other request mentioned above will be addressed within 15 working days.

## 9. CONTACT INFORMATION

### 9.1. The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, European Commission, Directorate-General for Defence Industry and Space, Unit A.3 EDF Implementation Defence Technologies and Innovation at [DEFIS-A3@ec.europa.eu](mailto:DEFIS-A3@ec.europa.eu).

### 9.2. The Data Protection Officer (DPO) of the Commission

In case of disagreement with the Data Controller, you may contact the Data Protection Officer ([DATA-PROTECTION-OFFICER@ec.europa.eu](mailto:DATA-PROTECTION-OFFICER@ec.europa.eu)) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

### **9.3. The European Data Protection Supervisor (EDPS)**

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor ([edps@edps.europa.eu](mailto:edps@edps.europa.eu) or [https://edps.europa.eu/data-protection/our-role-supervisor/complaints\\_en](https://edps.europa.eu/data-protection/our-role-supervisor/complaints_en)) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

#### **10. WHERE TO FIND MORE DETAILED INFORMATION?**

The Commission DPO publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following record reference: [DPR-EC-25709.1](#)