

PRIVACY NOTICE FOR NATURAL PERSONS WHO PARTICIPATE TO THE ONLINE STUDY “OpenTag”

This privacy notice (the “**Privacy Notice**”) is compliant with the EU General Data Protection Regulation 2016/679 (“**GDPR**”), and explains how we, **Research Centre on Interactive Media, Smart Systems and Emerging Technologies - RISE Limited** (“**we**”, “**us**”, “**our**”, “**ours**”), handle, treat and process personal data, including special categories of personal data (also known as sensitive data) collected only in the course of visiting the website address <http://ec2-34-255-198-84.eu-west-1.compute.amazonaws.com/opentag/> (the “**Online Study Website**”) for the purposes of entering the System and/or participating to the Online Study and/or answering the Questionnaire (as the terms are defined herein below).

This Privacy Notice is addressed **only** to the following persons (“**you**”, “**your**”, “**yours**”):

- (a) persons that use the System and/or participate to the Online Study and/or answer the Questionnaire; and/or
- (b) persons that visit the Online Study Website and use the System and/or participate to the Online Study and/or answer the Questionnaire.

Note that this Privacy Notice does not apply to the use of our website for which a separate privacy notice is in place under the title “Privacy Notice for Natural Persons who are Website Visitors” and addressed to the users of our website.

For any further information regarding this Privacy Notice, please contact us at info@rise.org.cy.

The Online Study – The System

We, as a research centre, have launched an online research, namely “OpenTag”, on people’s perceptions of computer vision algorithms. We are interested in learning whether or not people feel that these algorithms can describe their images in a manner that is both accurate and fair (the “**Online Study**”).

For the purposes of the Online Study we have developed a demo system (the “**System**”) connected with the Online Study Website through which we collect, process and save images uploaded by you, as participants to the Online Study and users of the System, which we then analyse through various third party APIs (computer vision APIs that process an input image and return/output a description of the same image). We then aggregate the API outputs and we ask you to answer various questions on, inter alia, how you interpret and evaluate the API outputs (the “**Questionnaire**”). For the purposes of the Online Study, we also ask you to optionally provide us with certain demographic data (e.g., age, gender, language(s) spoken).

Who is the data controller?

The data controller processing your personal data through the Online Study Website and/or the Online Study and/or the System and/or the Questionnaire is **Research Centre on Interactive Media, Smart Systems and Emerging Technologies - RISE Limited**, a duly registered, limited liability company by guarantee, incorporated in Cyprus under registration number HE379132 with its registered office at Dimarcheio Lefkosias, Plateia Eleftherias, 1500, Nicosia, Cyprus (“**RISE**”).

What personal data do we collect and for what purposes?

When you visit the Online Study Website, when you use the System, and when you choose to

participate to the Online Study, we may collect and process the following personal information, which shall be received directly from you:

- Gender, age, language(s) spoken (demographic data will be collected **anonymously**)
- Images of your choice (e.g. images of a single individual (like a selfie), images of small groups (like family images) uploaded by you in the System
- Date and time when the image was uploaded
- Responses to the Questionnaire
- IP address and location data
- Date and time of entry in and exit from the Online Study Website and/or the System

We collect your personal information for the following purposes:

- Conduct and manage the Online Study
- Academic Research
- Access and analysis of facial images (where you have given your explicit consent to use the images uploaded by you in the System via a pop-up on the Online Study Website)
- Analysis of **anonymous** demographic data (where you have opted to provide us with your age, gender, language(s) spoken information, provided you have given your explicit consent to use your demographic data (age, gender, language(s) spoken) via a pop-up on the Online Study Website)
- Analysis of aggregate responses, results and trends for the purposes of the academic research
- Improvement of future studies and/or questionnaires
- Google analytics: the System uses analytical and tracking data which is automatically collected and processed by Google through cookies
- Complying with any applicable law, court order and exercise and/or defend our legal rights and other judicial process
- Legitimate interest to use your personal data provided your interests and fundamental rights are not overridden

Cookies

We also collect certain non-personally identifiable information about your use of our website through a tool called “Google Analytics”. Google Analytics collects information such as how often users visit this site, what pages they visit when they do so, and what other sites they used prior to coming to this site. We use the information we get from Google Analytics only to improve this site. Your information will not be used for marketing purposes. Google Analytics collects only the IP address assigned to you on the date you visit this site, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Although Google Analytics plants a permanent cookie on your web browser to identify you as a unique user the next time you visit this site, the cookie cannot be used by anyone but Google. Google’s ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#). You can prevent Google Analytics from recognizing you on return visits to this site by disabling cookies on your browser by using the following links:

Internet Explorer: <http://windows.microsoft.com/nl-NL/windows7/Block-enable-or-allow-cookies>

Chrome: <https://support.google.com/chrome/answer/95647?hl=en-GB>

Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>

Safari: <http://support.apple.com/kb/PH5042>

What legal bases we use for processing your personal data?

We process your personal information in reliance on any one or more of the following legal bases:

- that it is in our legitimate interest or in a third party's legitimate interest to process your personal information, except where such interests are overridden by your interests or fundamental rights and freedoms which require protection of personal data, in particular where the data subject is a child; and/or
- that you have provided us with your consent (or explicit consent) to process the personal information you have supplied us with:

If you have given your consent (or explicit consent) to permit us to process any of your personal data, you may withdraw your consent (or explicit consent) to such processing at any time. However, the withdrawal of your consent (or explicit consent) shall not affect the lawfulness of processing based on consent before its withdrawal; and/or

- that we rely on any other applicable legal basis provided under applicable laws and regulations.

Where and for how long do we store your personal data?

Your personal data is stored on our servers and on the servers of the cloud-based database management services we engage, located within the EU.

Your personal data will be retained and securely stored by us for three (3) years or as long as is reasonably necessary for the purposes of our academic research. We may, subject to and in accordance with the GDPR and applicable Cyprus laws and regulations, also retain your personal data for longer periods for purposes of benchmarking. Where we no longer require your personal data, or where you exercise your right to withdraw your consent (or explicit consent) or your right of erasure, we will ensure that it is either securely deleted or destroyed or stored in a way which means it will no longer be used by us.

With whom do we share this personal data?

We may share your personal information with other organisations providing data processing activities to our organisation such as, including, without limitation, IT support, cloud services, computer vision APIs for catching, processing, analysis, routing, and delivery of images and third party images and information storage providers. Additionally, if required, we may share your information to researchers of RISE, administrative assistants of RISE, governmental/regulatory/law enforcement agencies or other third parties provided that such obligation is based on national or EU law.

When doing any of the above, we will comply with our legal and regulatory obligations in relation to your personal data, including, without limitation, maintaining appropriate safeguards in place.

What are your rights regarding your personal data?

Access: this enables you to request access and receive information regarding the personal data we hold about you.

Request for rectification: this enables you to request to have the data we hold about you to be completed or corrected.

Request for erasure: this enables you to request the deletion of the personal data we hold about you.

Restriction of processing: this enables you to make a request, in certain situations, that your personal data are only used for specific purposes.

Data portability: this enables you to request to obtain a copy of the personal data in a structured, commonly used and machine-readable format and/or the transmission of your personal data to another controller.

Withdraw consent: If we rely on your consent (or explicit consent) as our legal basis for processing your personal information, you have the right to withdraw that consent at any time. However, the withdrawal of your consent (or explicit consent) shall not affect the lawfulness of processing based on such consent before its withdrawal.

Object to processing of personal data: this enables you to object to the processing of your personal data

In order to exercise any of your above rights, please contact us at info@rise.org.cy. We will endeavour to respond to any request as soon as possible and no longer than 30 days from the receipt of the request. In case where we will not be able to respond to your request within the aforementioned time period or in case your request is rejected, we will inform you accordingly explaining the reasons for any delay or for rejecting your request. All rights can be exercised free of charge.

You also have the right to lodge a complaint with the Cyprus Commissioner for Personal Data Protection if at any case, you are of the opinion, that our company infringes your privacy. Please find more information at the official website of the Commissioner at www.dataprotection.gov.cy.

How do we protect your personal data?

As part of our effort to prevent any unauthorised access or disclosure of your personal data, we have implemented physical, technical and administrative safeguards. We also update and test our security technology on an ongoing basis and we restrict access to your personal data to those employees who need to know that information to provide our services to you. In addition, we train our employees about the importance of confidentiality and maintaining the privacy and security of your information. We commit to taking appropriate disciplinary measures to enforce our employees' privacy responsibilities.

Can minors participate in the Online Study?

The Online Study is addressed only to individuals over the age of 18 years old. A minor who wishes to participate to the Online Study may do so through his or her parents or legal guardians. If you are an individual under the age of 18 and you intent to participate to the Online Study, your parents or legal guardians must give their consent (or explicit consent).

Will this privacy notice change?

We reserve our right to amend this Privacy Notice from time to time and any changes will become effective when we post the revised Privacy Notice on our website, without further notice. By using the Online Study Website following these changes means that you have accepted the revised Privacy Notice.