



Identity Management in PUBlic SERVICES

D7.4 Website

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Executive summary

This deliverable presents the IMPULSE website (www.impulse-h2020.eu) and describes its different sections ('Project', 'Consortium', 'Use cases', 'Results & Resources', 'News' and 'Contact us') as well as the content already available in this initial version, which will be continuously updated throughout the project duration. This includes the privacy and cookies policies. Additional sub-sections may be incorporated in the future to support activities envisioned within the dissemination, communication and exploitation plans to reach target audiences and give visibility to the IMPULSE project itself and its results.

Document information

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Project URL	http://www.impulse-h2020.eu		
EU project officer	Giorgio CONSTANTINO		

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Summary (for dissemination)	Website and report on the different sections, structure and technology. The website will be used as one of the main communication resources to introduce IMPULSE, share documents (deliverables, studies, etc.) and news, including links to social media.
Keywords	Website, dissemination, communication

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24-03-2021	--	CEL		Revision of privacy and legal issues
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Abbreviations and acronyms

AI: Artificial Intelligence

CMS: Content Management System

eID: Electronic Identity

GDPR: General Data Protection Regulation

RTL: Right-To-Left

SEO: Search Engine Optimisation

1 Introduction

1.1 Mission

The IMPULSE website (<http://www.impulse-h2020.eu>) has been designed to create awareness about the IMPULSE project and give visibility to the main ideas, advances, and results and, thus, ensure an effective dissemination. Specifically, the site:

- Presents a clear view of the IMPULSE overall goals, consortium, case studies and results.
- Supports and promotes any dissemination, communication, innovation and exploitation activity.
- Serves as a repository to share public documents generated within the project, such as public deliverables, open publications, newsletters, dissemination materials, etc.
- Facilitates interaction with the consortium through a contact form.
- Provides a direct link to IMPULSE social media accounts in Twitter ([@Impulse_EU](#)) and LinkedIn ([Impulse Project H2020](#)).

The IMPULSE website is not a static space, but it will be updated continuously with new sub-sections and attractive content reflecting the progress and achievements of the project in due time.

1.2 Document structure

This report, which describes the most relevant aspects of the website, is structured as follows:

- Section 2 provides an overview of the design of the website, its sections and sub-sections.
- Section 3 highlights key aspects related to the technologies used for the development of the website.
- Conclusions are summarised in section 4.

2 Website design and content

The IMPULSE website has been designed using [Wordpress](#), an easy-to-use tool with highly customisable options and modules for the development of small websites. In this framework, the theme “Neve” has been selected and adapted to the IMPULSE corporate identity, mainly combining the blue scale for blocks, icons, buttons but also texts and images. “Neve” also ensures key functionalities such as:

- **Responsive design:** Responsive layout and a modern design. It will adjust to any screen size and device, which seems to be very appropriate since IMPULSE promotes the use of mobile phones for secure eID in online public services.
- **Live customizer:** The customizer allows a Wordpress user to make changes and see their effects with an immediate live preview. A logo can be added and other options, such as changing colours or moving elements around are also available.
- **Custom widgets:** Custom widgets (Twitter, recent posts, popular posts, etc.) can be integrated into the site.
- **Translation & RTL ready:** Every element in this theme can be translated if needed, so any Right-To-Left (RTL) language can be used.
- **SEO friendly:** Search Engine Optimisation is a must these days for the website to have a strong online presence. This theme comes with a SEO-ready structure, plus a clean and optimised source code.

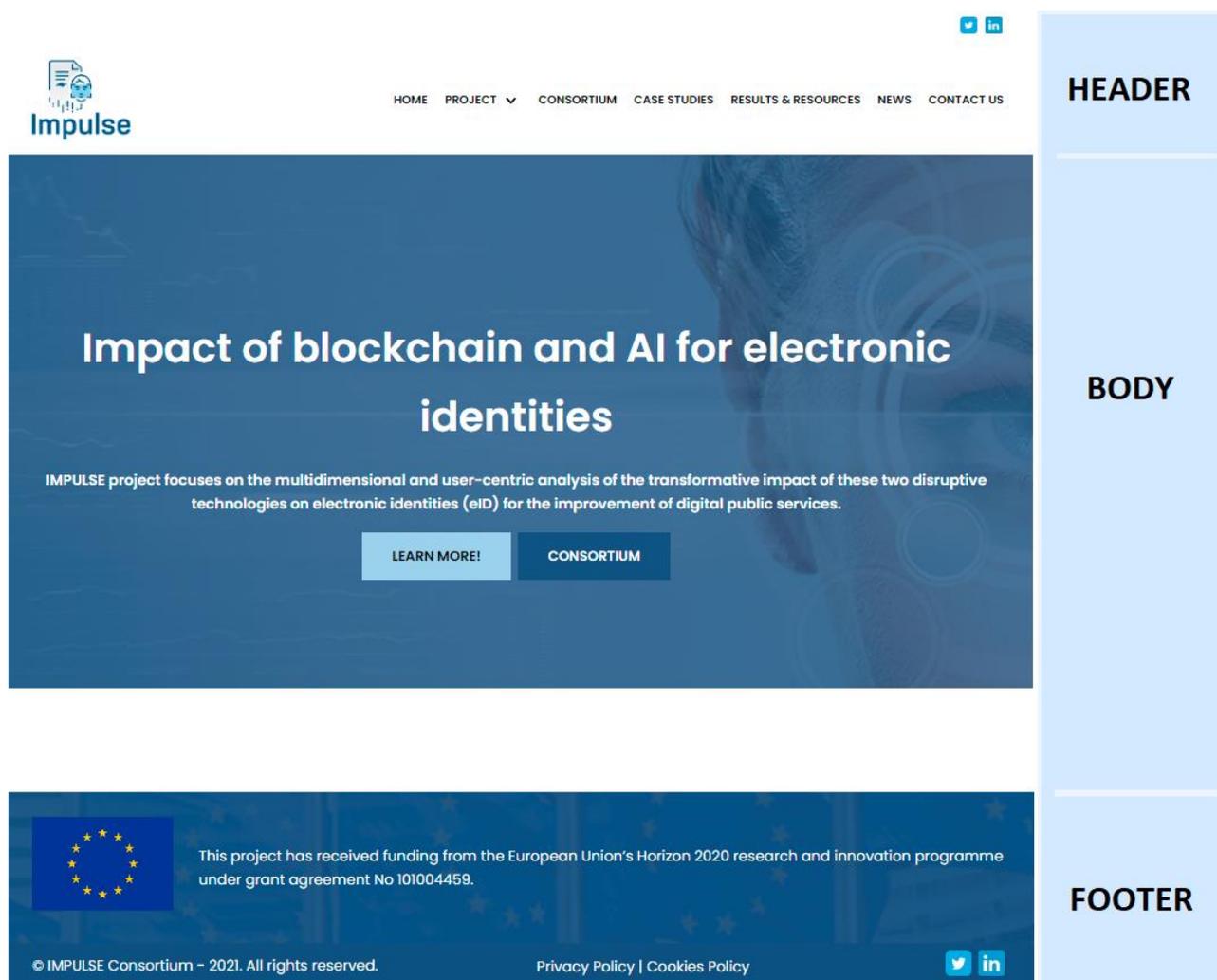


Figure 1: General page structure.



The general structure of the pages is shown in Figure 1. They consist of three main blocks: header, body and footer. Both the header and the footer remain unchanged, while the body contains the specific information to be displayed.

The header presents three elements: the IMPULSE logo on the left, the navigation bar with seven tabs (see description in the following sub-sections) and right alignment, and two direct links to the social media accounts (Twitter and LinkedIn) on the upper right corner.

The footer is made of the European Union flag and the text “*This project has received funding from the European Union’s Horizon 2020 research and innovation programmed under grant agreement No. 101004459*” – as requested in the Grant Agreement – the copyright on the lower left corner and, again, the Twitter and LinkedIn icons on the right. Besides, the privacy (see section 2.8) and cookies (see section 2.9) policies can be accessed through the link at the bottom.

2.1 Home

The “Home” page (Figure 2) is the presentation page of the project. It starts with a *motto* to catch the visitor’s attention.

Impact of Blockchain and Artificial Intelligence to Improve Electronic Identities

IMPULSE project focuses on the multidimensional and user-centric analysis of the transformative impact of these two disruptive technologies on electronic identities (eID) for the improvement of digital public services.

[LEARN MORE!](#) [CONSORTIUM](#)

Improving online identification processes

IMPULSE aims to transform the mainstream discourse on digital identity by drawing up a **user-centric multi-stage method of multidisciplinary evaluation of eID management** that combines the bottom-up approach of co-creation with the need for a universal vision of digital identity ethics in providing public services.

MOTIVATION
The demand of more secure digital services, the opportunity to use disruptive technologies and various challenges.

[LEARN MORE!](#)

GOALS
6 goals related to public service's demands, disruptive technologies supporting advanced eID and roadmaps.

[LEARN MORE!](#)

OUTCOMES
A framework for a holistic integration of AI and blockchain technology, and actionable roadmaps.

[LEARN MORE!](#)

CONSORTIUM
A team of 16 entities from 9 different countries will use Artificial Intelligence and Blockchain to improve online identification processes.

[LEARN MORE!](#)

CASE STUDIES
IMPULSE brings together a set of representative and innovative processes as case studies in 5 countries.

[LEARN MORE!](#)

LATEST NEWS



[IMPULSE: European alliance to facilitate online identification in public services](#)
12 February 2021

Security, privacy and easy-to-use will be the central concept of IMPULSE. Coordinated by Gradient, this European project kicks off this month. A team of 16 entities from 9 different countries will use Artificial Intelligence and Blockchain to improve online identification processes. Gradient leads a project to develop... [Read More >](#)

“The digitalisation of public administration services is one of the seven flagship initiatives identified in the NextGen Europe programme, which gives an idea of the strategic dimension of IMPULSE.”
Luis Pérez Freire, Gradient, PROJECT COORDINATOR

Figure 2: “Home” page.

Then, visitors can go to the “Project” page (see section 2.2) if they click on “Learn more!” or to the “Consortium” page (see section 2.3) if they click on “Consortium”.

Below this initial block, under the title “Improving online identification processes”, the main aim of the project is briefly described followed by a link to obtain additional details about the project on the “Motivation” (see section 2.2.1), “Goals” (see section 2.2.2), “Outcomes” (see section 2.2.3), “Consortium” (see section 2.3) and “Case studies” (see section 2.4) pages.

The next block includes the last piece of news and is displayed under “Latest News” just above a quote from the project coordinator. Finally, the email icon redirects to the “Contact us” page (see section 2.7).

2.2 Project

The “Project” page (Figure 3) is split into three blocks:

PROJECT

IMPULSE will conduct a user-centric and multidisciplinary impact analysis on the integration Blockchain and Artificial Intelligence (AI) on eID in public services, evaluating benefits but also risks, costs and limitations, considering socio-economic, legal, ethical and operational impacts, together with framework conditions (like GDPR and eIDAS regulations, existing eID systems, and standards).

IMPULSE will use a demand-driven co-creation process as the guide, including pilot-oriented operational experimentation and involving Digital Innovation Hubs (DIHs). A set of 6 representative and innovative case studies in Denmark, Spain, Bulgaria, Iceland and Italy, led by a public service partner, will provide a variety of cultural, operational, legal, procedural and social contexts for research.

Two major outcomes will be produced:

1. **Holistic AI and blockchain technology** supporting GDPR-compliant eID to complement existing EU identity schemas, ensuring cross-border access and secure and adaptable requirements for actionable integration/adoption.
2. **Actionable roadmaps** (detailing pathways and good practices) for the adoption, escalation and sustainability of such advanced eID technologies by public services in the EU ecosystem.

IMPULSE aims to transform the mainstream discourse on digital identity by drawing up a user-centric multi-stage method of multidisciplinary evaluation of eID management

Fact sheet

Programme	Horizon 2020
Grant Agreement ID	101004459
Topic	DT-TRANSFORMATIONS-02-2018-2019-2020 – Transformative impact of disruptive technologies in public services
Funding scheme	Research and Innovation Action (RIA)
Budget	€ 3 987 593,75
EU contribution	€ 3 987 593,75
Start date	1 st February 2021
End date	31 st January 2024

Figure 3: “Project” page.

- A summary of the key ideas of the IMPULSE project together with an overview of the methodology used and the two major outcomes. This is written in black on white background.
- The main goal of IMPULSE written in white on blue background.
- A fact sheet with some relevant information presented as a table.

In addition to this, the “Project” tab in the navigation bar unfolds a drop-down menu to the “Motivation”, “Goals” and “Outcomes” pages commented in the following sub-sections.

2.2.1 Motivation

The “Motivation” page (Figure 4) is structured around three topics “Demand of more secure digital services”, “Opportunity to use disruptive technologies” and “Challenges” that explain the basis, reasons and needs that led to IMPULSE. For each topic, some hints are listed.

MOTIVATION

Demand of more secure digital services



- **Digital Single Market (DSM)**
 - Personal and non-transferable access
 - Unambiguous identification
- **Secure and privacy-preserving eID as enabler**
 - Trust and confidence
 - Data treated in full respect of existing data protection legislation
 - No overlapping or contradictory versions of the same identity
- **Benefit from disruptive technologies**
 - New segments of population.
 - Ubiquity.
 - Robust, trustful and more friendly eServices.

Opportunity to use disruptive technologies



IMPULSE focuses on two:

- **Artificial Intelligence**
 - Biometrics authentication
 - Document verification
 - Digital onboarding
- **Blockchain**
 - A well-known implementation of Distributed Ledger Technology (DLT)
 - Shift the ownership of personal data from government to citizens
 - Smart contracts to share the rules under which the parties agree to interact

Challenges



- **Technical**
 - Development and deployment
 - Operational constraints
- **Non-technical**
 - Ethical & Legal
 - Policy and standards
 - Socio-economic and political
- **Gain acceptance**
- **Promote the adoption of disruptive eID concepts**

Figure 4: “Motivation” page.

2.2.2 Goals

The main goals presented in the “Goals” page (Figure 5) should help the visitor to know more about the IMPULSE project and be aware of the multidisciplinary approach in place, addressing technological, socio-economic, political, ethical and legal issues raised by the use of blockchain and Artificial Intelligence for the improvement of the eID paradigm in the context of public services.



Figure 5: “Goals” page.

2.2.3 Outcomes

The third page (Figure 6) that can be accessed through the “Project” drop-down menu – following “Motivation” and “Goals” – is the “Outcomes”. This highlights the two main outcomes of the project, although further details will be provided throughout the lifespan in the “Results & Resources” page:

- A framework for a holistic integration of AI and blockchain technology.
- Actionable roadmaps for the adoption, escalation and sustainability of advanced eID technology.

OUTCOMES

Research will result on specific and actionable outcomes in a twofold form:



1. **A framework for a holistic integration of AI and blockchain technology** to support secure and privacy-preserving eID management by public services, having been deployed and valued in different public services (and countries) to complement existing EU identity schemas.

2. **Actionable roadmaps for the adoption, escalation and sustainability of advanced eID technology** by public services in the European ecosystem, in different countries and at different levels (local, regional, national, and cross-border) and supported by DIHs all around Europe.



Figure 6: “Outcomes” page.

2.3 Consortium

The IMPULSE consortium consists of sixteen organisations from nine European countries. The logos of these organisations are arranged on the “Consortium” page (Figure 7) according to their position in the Grant Agreement. A 4-by-4 distribution is used for a balanced presentation.

Each logo is also a hyperlink to the organisation’s website where more information can be found just by clicking on it.

CONSORTIUM

A team of 16 entities from 9 different countries will use Artificial Intelligence and Blockchain to improve online identification processes.



Figure 7: “Consortium” page.

2.4 Case studies

The six case studies that will be analysed in IMPULSE are presented on the “Case studies” page (Figure 8). Before, a short paragraph refers to the variety of contexts due to the involvement of five different European countries and the tasks to be addressed. The title of the case study is displayed together with the name of the responsible organisation and its logo.

It is expected that additional information about the case studies will be incorporated once they are fully elaborated and are ready for the instantiation and piloting.

CASE STUDIES

IMPULSE brings together **a set of representative and innovative processes as case studies in 5 countries** providing a variety of contexts (cultural, operational, legal, procedural, social) and **addressing the whole cycle**: input, business workflow, output and archiving.

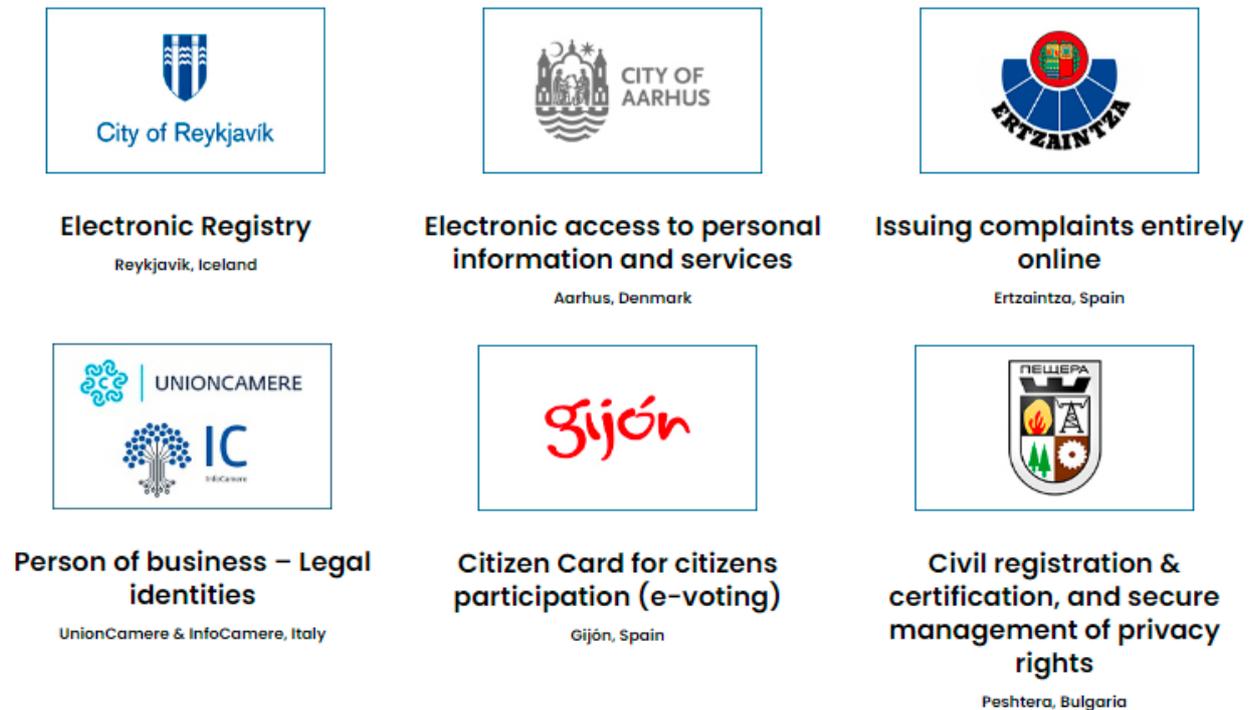


Figure 8: “Case studies” page.

2.5 Results & Resources

The “Results & Resources” page (Figure 9) will list and describe the main achievements and outcomes of IMPULSE, but also other useful information such as some slides with an introduction to the project. This is one of the more dynamic sections of the site, since it is expected that all partners contribute to making visible their results.

RESULTS & RESOURCES



Figure 9: “Results & Resources” page.

2.6 News

The “News” page displays the news published by the consortium (title, date, description and illustrative photo), which may range from press releases and new inputs in the “Results & Resources” section, to information about relevant events (internal or external), etc. If the visitor clicks on “Read more” the whole text is presented on a new page.

NEWS



IMPULSE: European alliance to facilitate online identification in public services

12 February 2021

Security, privacy and easy-to-use will be the central concept of IMPULSE. Coordinated by Gradiant, this European project kicks off this month. A team of 16 entities from 9 different countries will use Artificial Intelligence and Blockchain to improve online identification processes. Gradiant leads a project... [Read More »](#)

Figure 10: "News" page.

2.7 Contact us

In the “Contact us” page, the visitor can fill out the form to ask for additional information, clarifications or simply getting in touch with the consortium for further discussion.

The form cannot be submitted unless the visitor, in line with the General Data Protection Regulation (GDPR), agrees on the privacy policy (see section 2.8).

CONTACT US

Please, fill the form if you want to contact us. We'd love to hear from you!

Name *

First Last

Email *

Subject *

Comment or Message *

Consent declaration *

I consent to having process my personal information in accordance with the [privacy policy](#) of the website

SUBMIT

Figure 11: "Contact us" page.

2.8 Website Privacy Policy

The “Website Privacy Policy” page (Figure 12) can be accessed from the link in the footer (see section 1.2) as well as from the contact form (see section 2.7). The full text is available in Appendix I “Privacy Policy”.

Website Privacy Policy

Introduction

This Privacy Policy is aimed at illustrating the means and purposes of the processing of personal data carried out by TREE TECHNOLOGY S.A. having its registered office in CAMINO DE LA POMARADA 76 – 33429 LA FRESNEDA – SIERO (ASTURIAS, SPAIN), in its quality of data controller (hereinafter “Data Protection Officer” or the “Controller”), through the website <https://www.impulse-h2020.eu/> (hereinafter the “Website”).

Please note that this Privacy Policy is applicable to anyone who accesses and visits the Website or otherwise interacts with the web services offered on the Website (the “User”).

Pursuant to article 5 of the [General Data Protection Regulation \(EU\) 2016/679 \(“GDPR”\)](#), the Processing of the Personal Data carried out by TREE TECHNOLOGY S.A. for the development and management of the Website will be based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and accountability.

Any term indicated in capital letters shall have the meaning attributed to it within the GDPR, or otherwise provided hereto.

Figure 12: “Website Privacy Policy” page.

2.9 Website Cookies Policy

The “Website Cookies Policy” page (Figure 13) can be accessed from the link in the footer (see section 1.2). The full text is available in Appendix II.

Website Cookies Policy

The present cookies policy (hereinafter the “Cookies Policy”) has been provided by TREE TECHNOLOGY S.A., having its registered office in CAMINO DE LA POMARADA 76 – 33429 LA FRESNEDA – SIERO (ASTURIAS, SPAIN), (hereinafter the “Controller”) to inform users’ website (hereinafter, the “Website”) on how cookies on the Website are used.

Any term indicated in capital letters shall have the meaning attributed to it within the EU General Data Protection Regulation no. 2016/679 (hereinafter, “GDPR”) or otherwise provided hereto.

For any further information and/or clarifications, it is possible to contact the Controller at the following address: dpo@treetk.com.

To this extent, this document shall be considered as an integral part of the privacy policy on the processing of personal data, available at the following link: <https://www.impulse-h2020.eu/privacy-policy/>.

Definition of cookies

Cookies are short strings of text that the websites on which a user navigates can send to his or her terminal equipment in order to be memorized and subsequently transmitted back to the website upon the user’s subsequent visit to the same website. Cookies facilitate and expedite the loading of a given web page.

Figure 13: “Website Cookies Policy” page.

3 Technical information

3.1 Framework

The implementation of the public website was carried out using Wordpress 5.7 as Content Management System (CMS). In addition to this, some recommendations can be found in the following list for achieving a good performance:

- PHP v7.2
- Zend Engine v3.2.0 with Zend OPcache v7.2.28
- HTTPS support

3.2 Additional plug-ins

With the purpose of improving the capabilities of the website, additional plugins were also required and, thus, installed:

- **GDPR Cookie Consent:** Aimed to show that the website complies with the EU Cookie Law / GDPR.
- **Official StatCounter Plugin:** European alternative to GoogleAnalytics for statistical analysis.
- **Download Monitor:** Monitoring of downloads and other files.
- **Custom Twitter Feeds:** Customizable Twitter feeds for the website.
- **Templates Patterns Collection:** Neve theme and block patterns library service.
- **TK Google Fonts:** Google Fonts user interface for WordPress themes.
- **Under construction:** The site is put behind a landing page, coming soon or maintenance mode.
- **WP columna:** Addition of columns to visual editor and the page in an easier way.
- **WP Statistics:** Complete information on the website's visitors.
- **Akismet Anti-Spam:** Protection against spam.

4 Conclusions

The IMPULSE project website is one of the main resources to contribute to the achievement of the dissemination and communication objectives. Together with the social media, it is deemed to be a good channel to present the main ideas, advances and results to a wide audience, allowing a continuous update of the contents through private access to the management tool.

The website adopts the design of the corporate identity of the project (logos, templates, etc.) and it consists of a home page and several public pages ('Project', 'Consortium', 'Case studies', 'Results & Resources', 'News' and 'Contact us'), each of them dedicated to a specific topic/area. The privacy and cookies policies are also presented in separated pages. A refinement of the site might be carried out along the project lifespan in response to the IMPULSE needs and interests and based on the feedback of the consortium partners.

Appendix I “Privacy Policy”

Introduction

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Any term indicated in capital letters shall have the meaning attributed to it within the GDPR, or otherwise provided hereto.

Data Controller

The data Controller will be TREE TECHNOLOGY, S.A. (dpo@treetk.com).

Which kind of Personal Data are collected

Traffic and Internet data

The computer systems and software procedures used to operate the Website acquire, during their normal operation, some Personal Data whose transmission is implicit in the use of Internet communication protocols.

This category of data includes, among others, IP addresses, browser type, operating system, the domain name and website addresses from which the User logs in or out, the information on pages visited by User within the Website, the time of access, time period of User’s staying on a single page, the internal path analysis and other parameters regarding the User’s OS and computer environment.

These technical / IT data are collected and used only in an aggregated and not immediately identifiable manner. They could be used to ascertain responsibilities in case of crimes against the Website, or upon public authorities’ request.

In order to consent the collection of this category of data, the Website uses cookies. Please, read the [Cookies Policy](#) of this Website for any further information about them.

Personal data provided by the User

We may ask you to provide us with Personal Data of your such as first name, last name, address, and e-mail address, to the extent to use the contact form published on the Website.

Why Personal Data are processed and Lawful basis

User’s Personal Data will be processed exclusively for the following purposes, and exclusively in the framework of the research Project’s activities (further information on the Project may be found at following URL: <https://www.impulse-h2020.eu/project/>):

- To fulfil any request made by the User through the [contact form](#) available on the Website. This processing is needed to provide the Users with the information they have directly requested, by granting their freely and informed consent, according to Art. 6.1, a) of GDPR;
- To comply with obligations set forth by applicable laws and regulations and to ascertain responsibilities in case of any computer crimes against the Website. As this processing is mandatory by law, User's consent is not required according to Art. 6.1, c).

In any case, please be aware that User's Personal Data will not be used for any automated decision-making including profiling, nor will they be further processed without the previous consent of the User.

Cookies

The Website has implemented the use of cookies. Further information on the use of cookies may be found at the following URL: <https://www.impulse-h2020.eu/cookies-policy/>.

For how long Personal Data are kept

The Controller only keeps your Personal Data for the time necessary to fulfil the purposes for which the data have been originally collected and/or the purpose of the Project. In any case the said data will be destroyed after 5 years from the completion of the Project.

How Personal Data are secured

Personal Data may be processed through information technology tools either manually or electronically, but always under technical and organizational measures that enable ensuring their security and confidentiality, especially for the purposes of preventing any risk arising from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to personal data. All the processing operations as well as the security measures implemented took into consideration the risk of the processing and of the nature of the Personal Data.

Organisational measures include restricting access to the Personal Data solely to authorised persons or third parties where duly authorized and instructed by the Controller for the purposes of processing operation, and according to the 'need to know' principle. Such staff abide by statutory, and when required additional, confidentiality agreements.

Who may access Personal Data

The Personal Data collected by the Controller might be shared with:

- members of the [IMPULSE Consortium](#), only to fulfil User's requests regarding Project's activities and objectives;

The Controller might be required to disclose Users' information in order to comply with the law, a judicial proceeding, court order, subpoena, or other legal process, or where it is necessary to investigate, prevent or take action regarding illegal activities, suspected fraud, situations involving potential threats to the safety of any person or as evidence in litigation in which we are involved.

Without prejudice to the above, unless upon specific consent of the data subject or as otherwise required by applicable laws, User's Personal Data shall not be shared with any other organizations.

In particular, the Controller will not share User's Personal Data with other countries outside the European Economic Area (hereinafter, the 'EEA'). In any case, should a transfer of the data outside the EEA become necessary in the future, it will be carried out in accordance with the provisions of the GDPR and the User will be timely informed about this processing.

Redirection to other websites

The Website incorporates links which allow the User to connect to other websites run by third parties. The Controller assumes no responsibility regarding the processing of personal data which may take place through and/or in connection with third-parties' websites.

Therefore, each User who accesses such web pages and/or social media platforms through the Website must carefully read the relevant privacy policies in order to better understand how their personal data will be processed by the third parties which, as autonomous controllers, will provide and manage such websites.

Users' rights and how to exercise them

Pursuant to the GDPR, Users have a number of rights concerning the Personal Data that the Controller hold about them. If Users wish to exercise any of these rights, please use the contact details set out above.

- **The right to be informed.** Users have the right to be provided with clear, transparent and easily understandable information about how the Controller use their information and about their rights. This is why the Controller is providing with the information in this Privacy Policy.
- **The right of access.** Users have the right to obtain access to their Personal Data subject matter of the data Processing. This will enable Users, for example, to check that the Controller is using Users' Personal Data in accordance with the relevant data protection law. If Users wish to access the information the Controller holds about them in this way, please get in touch (please see section Contact information here below).
- **The right to rectification.** Users are entitled to have their Personal Data corrected if it is inaccurate or incomplete. Users can request that the Controller rectifies any errors in information that the Controller hold by contacting it (please see section Contact information here below).
- **The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables Users to request the deletion or removal of certain of the Personal Data that the Controller hold about Users by contacting the Controller (please see section Contact information here below). Please remember that it is possible that pursuant any applicable law the Controller may not have all Users' Personal Data erased.
- **The right to restrict processing.** Users have rights to 'block' or 'suppress' certain further use of their Personal Data. When processing is restricted, the Controller can still store Users' Personal Data, but will not use it further.
- **The right to data portability.** Users have the right to obtain their personal information in an accessible and transferrable format so that they can re-use it for their own purposes across different service providers. This is not a general right however and there are exceptions. To learn more please get in touch (please see section Contact information here below).
- **The right to lodge a complaint.** Users have the right to lodge a complaint about the way the Controller handles or processes User's Personal Data with the relevant national Data Protection Authority (please find here the list of European Data Protection Authorities https://edpb.europa.eu/about-edpb/board/members_en).
- **The right to withdraw consent.** If Users have given their consent to anything the Controller do with their Personal Data (i.e. the Controller relies on consent as a legal basis for processing your information), Users have the right to withdraw that consent at any time. Users can do this by contacting the Controller (please see section Contact information here below). Withdrawing consent will not however make unlawful our use of User's information while consent had been apparent.
- **The right to object to processing.** Users have the right to object to certain types of processing. Users can for example object to the publication of pictures taken of you within the context of a conference.

Where Users wish to exercise their rights in the context of one or several specific processing operations, please provide their description in the requests.

Users requests will be handled within a maximum of 30 (thirty) working days.

Contact information

If Users would like to exercise their rights under GDPR, or if they have comments, questions or concerns, or if they would like to submit a complaint regarding the collection and use of their Personal Data, they might contact the following email address: dpo@treetk.com.

Changes

Where appropriate, we will notify you of any changes to this privacy policy, for example by email.

Entry into force

The present Privacy Policy entered into force the 24th March 2021, version 1.0

Appendix II “Cookies Policy”

The present cookies policy (hereinafter the “Cookies Policy”) has been provided by TREE TECHNOLOGY S.A., having its registered office in CAMINO DE LA POMARADA 76 – 33429 LA FRESNEDA – SIERO (ASTURIAS, SPAIN), (hereinafter the “Controller”) to inform users’ website (hereinafter, the “Website”) on how cookies on the Website are used.

Any term indicated in capital letters shall have the meaning attributed to it within the EU General Data Protection Regulation no. 2016/679 (hereinafter, “GDPR”) or otherwise provided hereto.

For any further information and/or clarifications, it is possible to contact the Controller at the following address: dpo@treetk.com.

To this extent, this document shall be considered as an integral part of the privacy policy on the processing of personal data, available at the following link: <https://www.impulse-h2020.eu/privacy-policy/>.

Definition of cookies

Cookies are short strings of text that the websites on which a user navigates can send to his or her terminal equipment in order to be memorized and subsequently transmitted back to the website upon the user’s subsequent visit to the same website. Cookies facilitate and expedite the loading of a given web page.

Cookies can be “session” or “persistent” cookies. A session cookie is a cookie that is automatically deleted when the user closes the browser, whereas a persistent cookie is a cookie that remains stored in the user’s terminal device until it reaches a pre-determined expiration date.

Furthermore, additional classification of cookies includes:

Typology of cookie	Explanation
Depending on the source	First party cookies: cookies that a visitor receives from the same website that he/she is visiting.
	Third party cookies: cookies that a visitor receives from websites or web servers provided by a third party.
Depending on the purposes	Necessary or technical cookies: these cookies help make a website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.
	Marketing or profiling cookies: these cookies are used to track visitors across websites. The intention is to display ads that are relevant and engaging for the individual user and thereby more valuable for publishers and third-party advertisers.

Cookies implemented on the Website and how to disable them

On the Website, the Controller have implemented the following cookies:

Cookie	Category	Duration	Description
cookieLawInfo-checkbox-analytics	Necessary	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookie is used to store the user consent for the cookies in the category "Analytics".
cookieLawInfo-checkbox-necessary	Necessary	11 months	This cookie is set by GDPR Cookie Consent plugin. The cookies is used to store the user consent for the cookies in the category "Necessary".
CookieLawInfoConsent	Necessary	1 year	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.
viewed_cookie_policy	Necessary	11 months	The cookie is set by the GDPR Cookie Consent plugin and is used to store whether or not user has consented to the use of cookies. It does not store any personal data.
is_unique	Non necessary	5 years	This cookie is set by Statcounter. It is used to determine whether a user is a first-time or a returning visitor and to estimate the accumulated unique visits per site.
is_visitor_unique	Non necessary	2 years	This cookie is set by StatCounter Analytics. It is used to determine whether a user is a first-time or a returning visitor.
sc_is_visitor_unique	Non necessary	2 years	This cookie is set by the website that you visit. When it is first set, a random id is generated and stored in the cookie in order to avoid counting you as a visitor more than once. Similarly to the is_unique cookie, this cookie also stores a count of your returning visits.

The User may, at any time, prevent the setting of cookies through the Website by means of a corresponding setting of the Internet browser used, and may thus permanently deny the setting of cookies. Furthermore, already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all of the most commonly used Internet browsers. If the Data Subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable. Please visit the following link if you need further clarification on how to disable cookies: <https://www.aboutcookies.org>.

Changes

Where appropriate, we will notify you of any changes to this policy, for example by email.

Entry into force

The present Cookies Policy entered into force the 24th March 2021, version 1.0.