

PRIVACY POLICY

on the data processing related to the action 'Video contest for 12-19 years old teenagers in Europe' coordinated by La Palma Research Centre SL in the framework of the CIRAN project (Grant Agreement n. 101091483) in 2025.

1. Preamble

In the recent document, the partner **La Palma Research Centre SL** (hereinafter referred to as **Controller**) provides information in this Privacy Policy about its practice followed during data processing, and the organisational and technical measures taken for the protection of personal data as well as of the rights of data subjects and on the ways and means to exercise such rights. The Controller shall process the personal data in compliance with the applicable European legislation and ethical requirements, and in all cases, it shall take the technical and organizational measures necessary for proper and secure data processing.

By providing your personal data, you will agree with the terms of this privacy policy. This privacy policy applies only to the personal data of natural persons. The data of legal entities or other organisations that do not qualify as legal entities are not considered as personal data providers.

2. Controller's data

The Controller:

La Palma Research Centre S. L.

Registered Office: Avenida Venezuela 19, 1º Izq.,
38760 Los Llanos de Aridane,
Isla de La Palma (S/C de Tenerife)

VAT number: B76559152
e-mail: director@lapalmacentre.eu

3. Purpose, range, legal ground and duration of data processing

Purpose of data processing

The purpose of the data processing is to promote the implementation of the CIRAN project ("Critical RAW materials extraction in environmentally protected areas", EU grant agreement No 101091483) with the organisation of the 'Video contest for 12-19 years old pupils in Europe'; and in connection with this, to conduct the entire application procedure, including the evaluation of the received applications, the announcement of the results after the evaluation, and the notification of the applicants.

Range of processed data

With regard to the information related to the submission of applications, the Controller shall process the applicant's name, address, nationality, e-mail address, telephone number, age, and, if applicable, additional personal data provided by the applicant in connection with the application procedure, and the name and address of the minor applicants' parents or guardians. The Controller shall also process the image and audio recording of the persons

possibly appearing in the video submitted by the applicants and the personal data of such persons indicated in the short film (e.g. name).

Legal ground for data processing

The legal ground for data processing shall be the consent given by the applicant or her legal representative, according to Article 6 (1) a) of the EU-GDPR. If any person other than the applicant appears in the video, the applicant or her legal representative is required to obtain the consent of the person to processing his or her personal data (e.g. his or her name, image, audio recording).

Duration of data processing

The Controller shall process the personal data of the applicant and the persons shown in the video until the end or the maintenance period of the CIRAN project, or the withdrawal of the applicant's consent.

4. Engaging other data processors

The Controller is entitled to engage Rocky Shore Pictures Kft. as contracted partner to perform tasks related to data processing operations. The contracted partner shall process the personal data on behalf of the Controller, and it is entitled to act only in accordance with the instructions given by the Controller. The Controller shall monitor the work of the contracted partner. The Controller may only hire processors who provide adequate guarantees, in particular in terms of expertise, reliability and resources, that the technical and organisational measures, including security of data processing, are implemented to ensure compliance with the requirements of the GDPR.

5. Data Transmission

The Controller shall not transmit personal data to any third parties.

6. Persons entitled to obtain the personal data

The employees of the Controller shall process the data only to perform the tasks specified in their employment contract and job description.

7. Essential data security measures

The Controller shall process the personal data with the utmost care, in strict confidence, only to the necessary extent, and in the case of consent, in accordance with the possible instructions of the person providing it. The Controller strives with special care for the secure processing of personal data; therefore, it takes the technical and organisational measures and establishes the procedural rules necessary for the enforcement of privacy and data protection legislation. The Controller shall regularly review such measures and rules and amend them as necessary.

8. The applicants' rights and the rules governing the exercise of rights

Right to request for information

The applicant may request information about their personal data processed by the Controller. In such a case, the Controller will inform the applicant about what purpose and what duration the data were processed, and the rights in connection with the data processing.

Right to make a copy

Applicants may request a copy of the personal data processed by the Controller. In this case, the requested Controller will transmit a copy of the personal data processed to the contact details indicated by the applicant (e-mail address, mailing address).

Right to modify personal data

Upon the applicant's request, the Controller may modify or rectify the personal data or further store the new personal data provided by the applicant.

Withdrawal of consent

If the processing was based on the applicant's consent, the applicant has the right to withdraw the consent any time. However, the withdrawal of consent shall not affect the lawfulness of the data processing carried out prior to the withdrawal.

Right to erasure

Applicants can request the erasure of their personal data in a letter sent to the contact address of the Controller. The Controller may reject the applicant's request only in the cases specified by the GDPR.

Right to be forgotten

If the Controller has disclosed the applicants' personal data and it is required to delete the personal data, the Controller shall take all reasonable steps to inform the other controllers receiving the disclosed data that the applicant has requested to delete the personal data.

Right to restriction of data processing

Applicants may request blocking of personal data if

- the processing is unlawful, and the applicant opposes the erasure of the personal data and request the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims.

In the case of restriction, the reason for requesting the restriction must be indicated. The Controller shall fulfil the request to restrict data processing by storing personal data separately from all other personal data. For example, in the case of electronic data files, they shall be saved on an external data carrier, and the paper-based documents shall be stored in a separate folder.

The right to data portability

Applicants have the right to receive back their personal data in a widely used format (including, in particular a file with a .pdf, .doc extension) and transfer it to another controller. Applicants can request that the Controller transfers the personal data directly to another controller.

The right to object

Applicants have the right to object, relating to a particular situation, at any time, to processing of their personal data by applying the legal ground of considering interests. Then the Controller will examine the applicant's legitimate interests and may process the personal data primarily if the data processing is related to the submission, enforcement or protection of legal claims. The Controller shall fulfil the request within one-month, which period, in a particular case, may be extended by not more than two months. In the case of refusal to fulfil the

request, the Controller will inform the applicant within one month of receiving the request about the reasons for the refusal and the facts that may lodge a complaint with the relevant authority and exercise the right of judicial appeal. If the Controller has reasonable doubts concerning the identity of the person filing the request, it may request the provision of information necessary to confirm the identity of the data subject. Such a case shall be in particular if the data subject exercises his/her right to request a copy, in which case it is justified for the Controller to make sure that the request originates from the eligible person.

9. The applicant's right to lodge complaints

To enforce the applicants' rights related to processing, they may contact the Controller at the registered office address or in e-mail. The applicant can submit his/her claim or complaint to the Controller in writing, electronically or in person. The Controller will assess and examine the application and complaint within 15 days. If it is presumed that the Controller has not complied with the legal requirements, the applicant may institute official proceedings with the data protection authority in his/her country, or go directly to court if, in his/her opinion, the Controller violates the law during the data processing or causes damage to the applicant during the infringement.



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