

Privacy and personal data protection policy

This policy regulates personal data processing performed by Food4Sustainability, as data controller, joint controller and/or processor, within the scope of its activity, and reflects our concern and dedication to privacy and personal data protection, as required by applicable European and national laws.

1. Scope and objectives

Food4Sustainability (F4S)¹ aims at placing Portugal at the forefront of sustainable and circular food production systems by developing and testing emerging farming approaches and practices, training farmers and building capacity to transition to sustainable systems and providing education and experimentation for healthy living. We are a collaborative laboratory, accredited by the Portuguese Foundation for Science and Technology (FCT²), part of the national R&I system, in the form of a non-for-profit association.

Our 5 priority domains are: i) **circular economy** (FoodLab circular food production system, integrated multitrophic systems, extraction of high value-added compounds from by-products), ii) **sustainable farming** (demonstrators and scale-up initiatives, transition of conventional systems), iii) **territorial resources** and **ecosystem services** (monitoring and valorisation of key ecosystem services, water management), iv) **functional nutrition** (functional foods, personalised diet) and v) **entrepreneurship** and **innovation** (i-Danha Food Lab accelerator and annual event, sustainable farming academy, hackathons for students). Due to the breadth of our activities and our international focus, developing new digital technologies and applications are at the core of our mission, which includes digital service delivery to individuals and organisations.

This policy has been developed with the aim of communicating to all internal and external stakeholders how our concerns on **privacy and personal data protection** are applied in our business activities, in full respect of the applicable laws and best practices including, but not limited to, the General Data Protection Regulation (GDPR). The adoption of the hereby defined provisions takes into account their applicability in relation to the activities carried out by F4S, the risk assessments performed, and the strategic options taken, aiming at safeguarding the rights of data subjects and the long-term sustainability of F4S and its members.

2. Personal data protection

The protection of natural persons in relation to the processing of their personal data is a fundamental right. Article 8(1) of the Charter of Fundamental Rights of the European Union (Charter) and Article 16(1) of the Treaty on the Functioning of the European Union (TFEU) provide that all persons have the right to the protection of personal data concerning them. The principles and rules in this area aim to respect the fundamental rights and freedoms of natural persons regardless of nationality or place of residence and to contribute to freedom, security and justice, economic and social progress, the consolidation and convergence of economies at European internal market level and to the well-being of natural persons.

Responsibility. F4S is responsible for fulfilling all legal obligations in relation to the processing of personal data in which it participates, to the extent of such participation (level of responsibility established individually for each processing of personal data). F4S is established in Portugal, a

¹ <https://www.food4sustainability.org>

² <https://www.fct.pt>



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member-state of the European Union. The national data protection authority is Comissão Nacional de Proteção de Dados (CNPd)³.

Data controller. F4S subcontracts personal data processing activities to partner companies. These companies may also act as joint controller if they intervene in the definition of the purposes and/or means of processing personal data.

Data processor. F4S processes personal data as a processor for partner companies. It may also act as joint controller if it intervenes in the definition of the purposes and/or means of processing the personal data.

Liability. F4S is responsible for any breaches of the binding rules applicable to undertakings committed by entities involved that are not established in the EU, unless the fact that caused the damage is not attributable to F4S.

Personal Information collected. We collect certain information about you, as name, email, address and position on your company, in order to keep you updated on our activities and provide services within our mission.

3. Purposes of processing

Given the importance that the definition of purposes has for the effectiveness of all appropriate data protection measures F4S adopts an approach based on the following principles:

Functional. The purposes of personal data processing correspond to the purposes of business processes in the context of which such processing takes place.

Supra organizational. The purposes are seen equally regardless of the type of intervention the organization has regarding data processing (e.g., controller or processor). The same organization can play different roles in different instances/occurrences of the same process and, in all such cases, the purpose is the same.

The CLAV⁴ (Portuguese National Archives) process catalogue was adopted by F4S as basis for the definition of purposes of personal data processing. This instrument provides the indication of standard data **retention schedules** and **disposal actions**, based on i) legal provisions, ii) time limits of applicable responsibilities and iii) administrative and managerial utility (e.g., board mandates).

Personal data retention and disposal is performed taking into account the specific recommendations of the European Archives Group. Data may be kept for **longer periods** for statistical analysis and historical research purposes, but additional measures (e.g., anonymisation) may apply beyond the defined retention period.

4. Processing records

F4S keeps **records of processing activities** in which F4S takes part, containing i) entities involved and their responsibility, ii) purpose of processing, iii) categories of data subjects and personal data, iv) categories of recipients, including in third countries or international organisations, v) profiling and automated decisions, vi) scope of monitoring (if applicable), vii) retention schedule and disposal action, viii) appropriate technical and organisational security measures and, when applicable, ix) results of the impact assessment and prior consultation to the data protection authority.

Main **legal bases** for personal data processing are i) legal requirement, ii) performance of a contract, iii) legitimate interest and iv) consent. Some specific purposes can also be based on vital interest, where the processing cannot be manifestly determined on another legal basis.

³ <https://www.cnpd.pt>

⁴ <https://clav.dqlab.gov.pt/classes>



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F4S doesn't provide services to **children** (under 16). F4S doesn't process **special category** (or otherwise sensitive) **data** unless required for the defined lawful purpose. This may include racial or ethnical origin (e.g., from photos), biometric data (e.g., for access control) and health and criminal offence data (e.g., required by employment law). Processing of sensitive data is subject to impact analysis, as required by the Portuguese law.

5. International transfer

F4S respects and enforces the legal provisions relating to the protection of personal data in transfers to **third countries** and **international organisations**, in particular the decisions of the European Commission as to the suitability of such countries with regard to data protection or, in its absence, as to the appropriateness of guarantees, exercise of enforceable rights and effective corrective legal measures of those countries.

This is of special relevance for the selection and monitoring of cloud service providers, due to the dependency on their technical security measures, and the cooperation with international organisations in relevant sectors (food, climate, health), due to their geographic spread and diversity of guarantees, enforceable rights and corrective legal measures in countries where they are present.

6. Rights of data subjects

Requests relative to personal data protection shall be sent in written form by e-mail to privacy@food4sustainability.org. Applicable rights of data subjects include:

Information. F4S provides information to data subjects on data sources, responsible entities, purposes, subject and data categories, recipients, retention period and disposal action, profiling and automated decisions, scope of monitoring, retention and disposal and security measures. When personal data is obtained from external sources, F4S notifies the data subject within 30 days or at first use.

Access. F4S provides information to data subjects on personal data under processing, unless otherwise protected by law and within reasonable technical and organisational limits.

Rectification. F4S rectifies inexact or incomplete data under processing, without undue delay.

Erasure. F4S erases personal data when no longer necessary (beyond the retention period and with elimination as disposal action) or to comply with a legal obligation, unless other provision applies.

Portability. F4S provides personal data obtained from the data subject in a structured, common use format (for automated processing activities under consent).

Consent. F4S registers data subjects' consents and withdrawals, ensuring consents are free, informed, specific and explicit.

Limitation. F4S limits data processing to conservation (for processing activities under consent).

Opposition. F4S stops data processing (for processing activities under legitimate interest, including direct marketing), unless other provision applies.

Automated decision making. F4S provides human verification of automated decisions (including profiling) with legal of similarly significant effects (except performance of a contract).

7. Security of data and processing activities

Physical access. Personal data in physical media (including print) is kept in locked rooms and/or cabinets, with limited personnel access, according to their categories and processing purposes.

Authentication. Digital cloud platforms are protected by multi-factor authentication and strong passwords, frequently changed and with no repetition of historical passwords.



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Devices. Devices used to access F4S data are protected by a passcode (or similar method, including biometric). This applies to devices provided by F4S or employee-owned devices (bring-your-own-device).

External storage. The use of external storage devices (like pen drives) is limited to contingency situations, subject to prior approval.

Cyber security. F4S and its providers apply appropriate cyber security technologies and practices, including recurring awareness and training sessions for employees and relevant partners.

Resilience. Data processing is mainly performed by cloud platforms that are highly available and fault tolerant.

Digital preservation. Data is processed in well-defined standard, open and interoperable formats, whenever possible. The Portuguese national regulation for digital interoperability (RNID)⁵ is used as reference. Data storage and processing equipment that support cloud services are subject to regular replacement, based on their individual lifecycles. Data is structured by business activity (process), which provides adequate semantic support to digital preservation during retention periods and beyond (when applicable).

8. Use of digital services

8.1. Web site

Links. Our web site contains links to other web sites that are governed by different privacy and data protection policies. F4S is not responsible for content or practices of linked sites.

Cookies. Our web site uses cookies for i) its internal function, ii) availability and performance assessment and iii) usage monitoring, providing essential information to continuously adapting content to users' needs and expectations. Users can opt-out of cookies for ii) and iii). F4S cannot serve web site content without cookies required for i).

Cookies are alphanumeric identifiers that we transfer to your computer's (or other device's) persistent storage medium (e.g., hard drive) through your browser to enable our systems to recognize your browser and tell us how and when pages on our web site are visited and by how many people. We use cookies to enhance visitors' experiences, to learn more about their use of the web site and to improve quality. F4S cookies do not collect Personal Information, but we may combine the general information collected through cookies with Personal Information to tell us who you are or what your screen name or email address is.

Most browsers have an option for turning off the cookie feature, which will prevent your browser from accepting new cookies, as well as (depending on the sophistication of your browser software) allowing you to decide on acceptance of each new cookie in a variety of ways. We strongly recommend that you leave the cookies activated, however, because cookies enable you to take advantage of some of our web site's most attractive features.

Requests. Our web site provides users the option to subscribe services, provide feedback and submit requests. When identification and/or reply contacts are required, they are inputted by the user for each individual service. Currently, no login option exists. Nonetheless, all communications between user devices and our services are encrypted through secure web protocols (e.g., HTTPS).

Ads. Our web site may present third party advertising to users. These ads are managed by third parties and F4S is not responsible for its content or function. Ads may also set cookies. These cookies allow the ad server to recognize your computer or other device each time they send you an online advertisement to compile information about you or others who use your computer or device. This information allows ad networks to, among other things, deliver targeted advertisements that they

⁵ <https://dre.pt/pesquisa/-/search/114457664/details/maximized>



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believe will be of most interest to you. This Privacy Policy covers the use of cookies by F4S and does not cover the use of cookies by any advertisers.

8.2. Learning management system

The F4S academy provides online training content and support to training management activities throughout. This platform requires user **registration** and **authentication** for accessing functions other than viewing the course catalogue and course public information.

Electronic payments. Paid courses will be contracted through the platform. Electronic payment options will be provided (external platforms).

Copyright. Unless otherwise specified, provided content is protected by copyright and shall not be used beyond their respective license and terms of use. F4S ensures that all third-party content is licensed for the intended use.

8.3. Collaboration platform

Collaboration between F4S and its partners is supported by a collaboration platform comprising e-mail, calendar, shared folders, dedicated web sites and other applications (e.g., project management).

Third-party access to these resources will be provided within the specific scope of collaboration (e.g., project) and under the same rules defined for internal use. Upon completion, access rights may be limited to reduce risks of unauthorised access.

Conversely, F4S employees will also access **third-party platforms** for similar collaboration purposes, in full respect of the rules defined by the owner.

8.4. Newsletter

F4S regularly issues newsletters to interested parties (subscribers) by **e-mail** upon prior consent.

Similar content may be posted on **social media**, according to each networks' specific rules. User access to this content is regulated by the respective social network owner.

8.5. Other electronic communication

F4S will also contact specific **stakeholders** regarding topics within the scope of their relationship with F4S (e.g., regular updates to F4S members and partners), through available channels (e.g., e-mail, phone, chat, social media). Users may opt-out of receiving these messages.

9. Changes to this policy

F4S reserves the right to change these provisions at any time, as required by external obligations and internal decisions. Updated versions will be made available through our institutional channels (e.g., web site) and communicated to interested parties in a timely manner and using authorised communication media (e.g., e-mail).