



TRACE

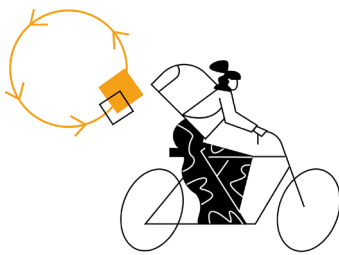
SMEs TRAnSition for a European Circular tourism Ecosystem



Co-funded by the European Union

### Single Market Programme (SMP/SME Pillar)

“COVID-19 Recovery through Sustainable Tourism Growth and SME Support”  
(SMP-COSME-2021-TOURSME)



# TRACE

## SMEs TRAnSITION FOR A EUROPEAN CIRCULAR TOURISM ECOSYSTEM

## PRIVACY POLICY

ACCORDING TO ART. 13 OF REGULATION (EU) 2016/679  
General Data Protection Regulation (GDPR)

THIS PRIVACY POLICY CONTAINS ALL THE INFORMATION THAT YOU NEED TO KNOW IN ORDER TO MAKE AN INFORMED DECISION ABOUT WHETHER TO PARTICIPATE IN TRACE PROJECT ACTIVITIES, ACCORDING TO ART. 13 OF REGULATION (EU) 2016/679 General Data Protection Regulation (GDPR), AS WELL AS YOUR RIGHT TO WITHDRAW AT ANY TIME. PLEASE, READ CAREFULLY EVERY SECTION BEFORE AGREEING TO THESE TERMS.

### TRACE PROJECT

**TRACE stands for “SMEs TRAnSition for a European Circular tourism Ecosystem”.** It aims to enhance and monitor the sustainability performance of SMEs in the tourism sector, boosting their awareness, development and capacity to develop and integrate sustainable innovations in their business practice, making sustainability, resilience and circularity as key factors of competitiveness in the rapidly changing global tourism market scenario.

Through the **TRACE Open Call for SMEs Support**, the **TRACE SMEs Support Programme** will involve directly at least 100 SMEs in 5 European countries (Italy, Belgium, Spain, Romania and Cyprus) that will be projected to become “champions” of sustainability and inspire other micro and small-sized enterprises in their local contexts.

The programme activities will focus on sustainability aspects of tourism SMEs such as analysis of Greenhouse Gases (GHG) emissions, development of sustainability plans, support for application to EU eco-label and other certification processes, and monitoring of a set of key indicators for the level of sustainability and circularity.



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The project pays attention to the enhancement of skills and capacities of the involved SMEs internal staff, through training and capacity building activities, and a series of direct support services dedicated to certification processes, sustainable finance and innovation management.

TRACE project will follow a step-by-step and learning-by-doing approach in the programme to bring also the small enterprises, with less qualified staff, to manage a process of innovation and implement relevant measures to reduce their environmental impacts while increasing economic resilience. The TRACE SMEs Support Programme aims at supporting tourism SMEs in taking their first steps towards the sustainability journey, starting a process which has a large potential to bring benefits not only to the single enterprise but to the entire territory/society, paying attention to nature, communities and cultural diversity.

TRACE is a project co-funded by the European Commission under the Single Market Programme (SMP/SME Pillar), which aims to provide sustainability services such as strategies, training activities and tools for tourism SMEs willing to innovate their business models and enhance their performance from a sustainability and circularity perspective. It is funded under grant agreement No. 101085893.

## **RISKS AND DISCOMFORTS**

There are no risks or discomforts that are anticipated from your participation in this project. If any discussion, action and/or image during project activities may cause emotional discomfort, you can stop your participation at any time.

## **BENEFITS**

You will not receive immediate benefits from participating in the Open Call for SMEs Support under TRACE project. However, if selected, you will enter into the TRACE SMEs Support Programme, which is aimed at enhancing skills and capacities of tourism SMEs towards higher sustainability. Moreover, if eligible, the SME participating will receive a Grant up to 7,200 Euro to develop your sustainability skills and action plans. As part of the TRACE Community, you will be given the opportunity to learn about innovative approaches in sustainable tourism, participate in targeted learning activities, and develop your SME action plan towards sustainability including application for sustainability certifications, receiving specialised support.

## **VOLUNTARY PARTICIPATION**

Participation in this TRACE Open Call for SMEs Support is completely voluntary and free of charge. There will be no reimbursement for your participation in the Open Call. However, if selected, your SME will enter the TRACE SMEs Support Programme and if the SME is eligible under the Open Call rules, it will receive a Grant up to 7,200 Euro to develop sustainability skills and action plans.

## **PURPOSE OF DATA PROCESSING**

Personal data will be processed only for the purposes of implementing the Open Call for SMEs Support, which includes the selection of eligible SMEs and invitation to take part in the TRACE SMEs Support Programme activities. Common personal data (name, organisation, role, country, email) are collected according to art. 6 of the GDPR and processed in order to identify the applicant organizations to include them between the SMEs



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invited to participate in the TRACE SMEs Support Programme. Personal data will be used to re-contact applicants to the Open Call for the purposes of organizing the TRACE SMEs Support Programme activities.

Photos, audio, and video recordings will be eventually taken during project meetings, training sessions and events. They will be processed according to the consent given and used for dissemination purposes.

## **DATA CONTROLLER**

The Data Controller for the purposes of the TRACE Open Call for SMEs Support and TRACE SMEs Support Programme is Iniziativa Cube S.r.l., addressed at Via G. Porzio, 4 – CDN Is G7, 80143 Napoli, Italy. The Data Controller can be reached at the following email address: [ivo.allegro@iniziativa.cc](mailto:ivo.allegro@iniziativa.cc)

The contact point for the exercise of your rights as data subject is the email address of Iniziativa Cube S.r.l.: [ivo.allegro@iniziativa.cc](mailto:ivo.allegro@iniziativa.cc)

The data control is shared with project partners, who may process common personal data only for the purposes as stated in this privacy policy (see "Purpose of data processing"). Project partners identified as *joint controllers* are:

CNR - Consiglio Nazionale Delle Ricerche (Italy)

Haute École ICHEC - ECAM - ISFSC (Belgium)

Iniziativa Cube S.r.l. (Italy)

Agentia Pentru Dezvoltare Regionala Nord-Est (Romania)

ANETEL - Anaptyxiaki Etaireia Eparchion Larnakas – Ammochostou Ltd (Cyprus)

Agenzia di Promozione Territoriale della Basilicata (Italy)

Diputacion Provincial de Teruel (Spain)

## **DATA PROTECTION OFFICER**

The Data Protection Officer (DPO) for the purposes of the TRACE Open Call for SMEs Support and TRACE SMEs Support Programme can be contacted at any time at the following email address [ivo.allegro@iniziativa.cc](mailto:ivo.allegro@iniziativa.cc).

## **AUTHORIZED PERSONS FOR DATA PROCESSING**

Your personal data are processed by internal staff members of partner organisations who have been authorised and designated as persons authorised to process the data, and who have been given appropriate instructions regarding measures to process data (see data processing methods).

## **POSSIBLE RECIPIENTS OF PERSONAL DATA**



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Within the limits relevant to the purposes of the processing indicated above, your data may be communicated to TRACE project partners only. The communication of personal data may occur only for the purposes of organising the activities of the TRACE Open Call for SMEs Support and TRACE SMEs Support Programme.

## **LEGAL BASIS OF DATA PROCESSING AND PURPOSE OF DATA PROCESSING**

Personal data are processed, in accordance with Article 6(1) of the GDPR, in the performance of institutional purposes related to the exercise of public interest tasks and the exercise of public powers, and to take steps prior to entering into a contract, under only explicit consent of the data subject as expressed through the Informed Consent Form.

## **DATA TYPES AND DATA PROCESSING METHODS**

For the purposes of organising this project activity, common personal data are collected (name, organisation, role, country, email). Personal data collected are processed lawfully, correctly, pertinently, limited to what is necessary to achieve the purposes for which they were collected, for only the time necessary to achieve the purposes for which they were collected, in accordance with the principles indicated in Article 5 of the GDPR and, in any case, in such a way as to guarantee their security and protect the utmost confidentiality of the data subject, securing strictly monitored access.

Photos, audio, and video recordings will be eventually taken during project meetings, training sessions and events. They will be processed according to the consent given and used for dissemination purposes.

## **DATA SHARING**

Common personal data (name, organisation, role, country, email) may be transferred to any country within the European Union other than the country where you are located, including private clouds and/or public clouds provided by third party providers. Any transfer of personal data to third parties takes place solely for the purpose of carrying out activities instrumental to the above-mentioned purposes of organising the TRACE Open Call for SMEs Support and the TRACE SMEs Support Programme. No personal data will be transferred to third countries or international organizations.

Photos, audio, and video recordings will be eventually taken during project meetings, training sessions and events. They will be processed according to the consent given and used for dissemination purposes.

## **DATA STORAGE**

Personal data are stored in a secure server located in the EU territory. The Cloud service is provided by Microsoft Teams service, which privacy policy is available at the following link: <https://learn.microsoft.com/en-us/microsoftteams/teams-privacy>.

The data collected during the TRACE project will be stored, processed and retained until the purposes of the TRACE project are achieved, and in any case in compliance with the Italian "Deontological rules for processing for statistical or scientific research purposes", published pursuant to art. 20, paragraph 4, of Legislative Decree no. 101 of 10 August 2018 (published in the Official Gazette no. 11 of 14 January 2019).



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Common personal data will be stored only for the duration of the TRACE project. After this time, personal data will be destroyed.

Audio and video recordings may be processed also by online conference platforms to organise remote training activities, such as Zoom and Microsoft Teams, and live streaming platforms such as YouTube, according to the consent given, and will be used for project dissemination purposes.

## **RIGHTS OF DATA SUBJECT**

With reference to the processing of personal data, the data subjects have the right to:

- access their own data, check it and request that the data be updated or corrected;
- revoke, at any time, the consent to the processing of their personal data previously given without giving reasons, however without affecting the lawfulness of the processing prior to the withdrawal of consent;
- or object to the processing of their data if this is done on a legal basis other than the consent previously given, including the processing of data for commercial, marketing and profiling purposes;
- request the restriction of the processing of their data: in this case, the data controller will not process the data for any purpose other than to keep their data;
- obtain the deletion or removal of their personal data, if the conditions set out in Article 17 of the European Data Protection Regulation (GDPR) apply.
- receive their data in a structured, commonly used and machine-readable format and, where technically feasible, to have them transferred to another data controller;
- to object to automated processing and not to be subjected to processing based solely on automated decisions, including profiling;
- to lodge a complaint with the competent data protection supervisory authority or take legal action.

To exercise one or more of these rights, data subjects may address a request to the contact details of the data controller indicated in this document.

Date of issue 24/03/2023