

## iFLEX Joint Controller Agreement: A Summary

All partners in the iFLEX project have entered into a Joint Controller Agreement (JCA). This means that the partners in the iFLEX project are joint data controllers and therefore jointly determine the purposes (reasons, scope and objectives) and means (means and methods) of processing personal data in the iFLEX project.

This document summarises the essential content of the iFLEX JCA.

Personal data is any information that relates to an identified or identifiable living individual. Different pieces of information, which collected together can lead to the identification of a particular person, also constitute personal data.

### **Who are the Joint Controllers of my personal data?**

The project partners in iFLEX are Joint Data Controllers. You can find their contact details in the [iFLEX privacy policy](#):

- VTT Technical Research Centre of Finland Ltd. (VTT)
- Smart Com d.o.o. (SCOM)
- Enerim Oy (EMPOWER)
- Jozef Stefan Institute (JSI)
- Athens University of Economics and Business (AUEB)
- Intracom SA Telecom Solutions (ICOM)
- Elektro Celje (ELE)
- Caverion Oyj (CAVERION)
- In-JeT ApS (IN-JET)
- ECE d.o.o. (ECE)
- HERON (HERON)
- Optimus Energy (OPTIMUS)
- Zveza potrošnikov Slovenije (ZPS)

### **Pilot hosts**

Pilot hosts are those partners who have collected your informed consent allowing the iFLEX project to collect and process your personal data as a part of your participation in an iFLEX pilot. Your pilot host is your main contact point. Your pilot host therefore also acts as your contact point between yourself and the joint controllers in the project (see also “Your rights” below). You will find specific contact details of your pilot host on your copy of the informed consent form. General enquiries to the pilots can be sent to:

#### Greek pilot

HERON  
Email: R&D@heron.gr

#### Slovenian pilot

ECE d.o.o.  
Email: info@ece.si

#### Finnish pilot

VTT  
E-mail: iFLEX-Info@vtt.fi

### **Sharing project personal data with joint data controllers**

The iFLEX joint data controllers may share the collected personal data for the purposes of the iFLEX project only and only if needed to carry out their task(s) in the project. It will not be shared with any other parties. We will always strive to pseudonymise personal data as quickly as possible after it has been collected and prior to sharing it. Whenever possible, personal data will be anonymised prior to being shared. In this case, it is no longer personal data. You can find more detail about the type of data that iFLEX will collect and process in the table below.

### **Joint data controllers' roles and responsibilities**

As joint data controller, each individual iFLEX partner who discloses project personal data to another iFLEX partner is responsible for complying with the General Data Protection Regulation (GDPR) and national data protection laws.

Although iFLEX partners are joint data controllers, they do *not* have equal roles or equally shared responsibilities. Individual joint data controllers may be involved in different stages of particular personal data processing and in a different scope. It is, therefore, not necessary for every iFLEX partner to have control over all stages of a particular data processing.

### **Your rights**

Your rights as a data subject are protected by the GDPR. Please refer to the project's [privacy policy](#) for details on your rights and how to exercise them.

If you send a request concerning the exercise of your Data Protection Rights to an individual partner, this partner must forward your request to the relevant pilot host (your contact point) without undue delay.

Description of processing			
<b>Name of processing purpose</b>	iFLEX flexibility assistant		
<b>Primary contact point (pilot host)</b>	Pilot in Finland: VTT Pilot in Slovenia: ECE Pilot in Greece: HERON  (Location is determined by the presence of data subjects).		
<b>Description of processing</b>	iFLEX project (H2020 research project funded by European Commission) concerning iFLEX flexibility assistant, especially the following: <ul style="list-style-type: none"> <li>- WP7: Research concerning energy flexibility management of the data subjects' (private) households.</li> <li>- WP2: Surveys and other co-creation activities with consumers</li> <li>- WP3: Development of algorithms for flexibility optimization</li> <li>- WP4: Interoperability of the data</li> <li>- WP5: Incentive mechanisms for user engagement.</li> </ul>		
<b>Legal basis of processing informed to data subjects</b>	Data subject's consent.		
<b>Personal data categories</b>	<ul style="list-style-type: none"> <li>- Contact information (such as name, address and other relevant contact details, if needed) and ID for the data subject.</li> <li>- Demographics data: marital status, children, household members, dwelling size, educational level, etc.</li> <li>- Household information (such as list of appliances)</li> <li>- Energy data from the data subject's household collected with smart meters (electricity meters).</li> <li>- Other measurement data from the household indoor climate collected with sensors (such as temperature, air quality, humidity).</li> </ul>		
<b>Data subject categories</b>	Research participants (tenant, owner) who are living in the household during the research period.		
<b>3<sup>rd</sup> party recipients of personal data – <u>Finnish pilot only</u></b>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Party: VTT</td> <td style="width: 50%;">Recipient (e.g. processor): Foundation for Student Housing in the Helsinki Region sr (Hoas).</td> </tr> </table>	Party: VTT	Recipient (e.g. processor): Foundation for Student Housing in the Helsinki Region sr (Hoas).
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<b>Transfer of personal data to non-EU or non-EEA country</b>	No		
<b>Duration of processing informed to data subjects:</b>	Duration of the project and 18 months thereafter.		
<b>Technical and organisational security measures:</b>	Primary contact point (pilot host) shall pseudonymize the personal data before disclosure to other Parties (by removing all contact information and direct identifiers before disclosure).  Personal data is stored in private cloud environment hosted by the consortium Parties operating as joint controllers. The environment is protected with: <ul style="list-style-type: none"> <li>- access control (personal user name, password)</li> <li>- encryption</li> <li>- user monitoring (log).</li> </ul>		