

PRIVACY POLICY

This privacy policy explains how we collect, use, and safeguard your data as part of the WEM Cyber Horizon Europe project, ensuring compliance with GDPR and other relevant privacy regulations.

1. Introduction

1.1

This is the privacy policy of the WEM Cyber Horizon Europe project (the “Policy”), which is referred to as “WEM Cyber”. The WEM Cyber project aims at boosting women’s participation and expertise in cybersecurity through targeted secondments, mentorship, and skills development programmes. Its consortium consists of the following eight partners BILISIM VADISI TEKNOPARK YONETICI AS (Türkiye), BOGAZICI UNIVERSITESI (Türkiye), VILNIAUS GEDIMINO TECHNIKOS UNIVERSITETAS (Lithuania), UNIVERZA V MARIBORU (Slovenia), UNIVERSIDAD POMPEU FABRA (Spain), UNIVERSITE DE TOULOUSE (France), WOMEN4CYBER MARI KERT – SAINT

AUBYN FOUNDATION (Belgium) and UBITECH (Greece); and five Turkish based affiliated entities SMSK BILGI TEKNOLOJILERI VE TICARET LIMITED SIRKETI, : SPHERETECH YAZILIM ANONIM SIRKETI, CYBERWHIZ SIBER GUVENLIK ANONIM SIRKETI, CLOUDMETRIK TEKNOLOJI ANONIM SIRKETI and ONINC ELEKTRONIK AS. The project has received funding from the European Research Executive Agency (REA) in the framework of Horizon Europe under grant agreement 101216854. The project runs from January 2026 to December 2028.

1.2

For the purposes of GDPR, BILISIM VADISI TEKNOPARK YONETICI AS (BV) is the ultimate controller of any personal data collected for the scope of deliverables to WEM Cyber. BILISIM VADISI TEKNOPARK YONETICI AS is located at MUALLIMKOY MAHALLESİ DENİZ CAD NO 143 5 GEBZE, KOCAELİ 41480, Türkiye. Hereinafter it is referred to as “us” or “we” throughout this Policy. This Policy provides details of the ways in which we process personal data in line with our obligations under data protection law including the General Data Protection Regulation (No 2016/679) (“GDPR”).

1.3

As part of its compliance, WEM Cyber has appointed a Lead Data Protection contact for the project:

WP5 Ethics Requirements Lead

Deniz Özer – denizozzer@bilisimvadisi.com.tr

2. Background and purpose

2.1

The purpose of this Policy is to explain what personal data we process and how and why we process it. For the purposes of this Policy, personal data means any information relating to an identified or identifiable person. Please read this Policy carefully as it provides important information about how we use personal data and explains your legal rights. In addition, this Policy outlines our duties and responsibilities regarding the protection of such personal data. The way we process data will evolve over time, and we will update this Policy to reflect changing practices and law. We will notify you of any changes, either the next time you visit a website or to the contact details we hold for you.

2.2

In order to meet our transparency obligations under data protection law, we will incorporate this Policy by reference into various points of data capture used by us (e.g. application forms etc.) and may provide additional information where relevant.

3. BILISIM VADISI TEKNOPARK YONETICI as Data Controller

3.1

We will act as a data controller in respect of personal data provided to us by various individuals in connection with the operation and administration of WEM Cyber. Such individuals will generally include the following:

a. WEM Cyber consortium partners:

- BILISIM VADISI TEKNOPARK YONETICI AS
- BOGAZICI UNIVERSITESI
- VILNIAUS GEDIMINO TECHNIKOS UNIVERSITETAS
- UNIVERZA V MARIBORU
- UNIVERSIDAD POMPEU FABRA
- UNIVERSITE DE TOULOUSE
- WOMEN4CYBER MARI KERT – SAINT AUBYN FOUNDATION
- UBITECH

b. WEM Cyber activities participants and respondents to any questionnaire

c. Interested parties or stakeholders who consent to share their personal data

We sometimes use third party providers to collect this information on our behalf such as Luma, Google Forms and Brevo. They are responsible for protection of personal data that they collect and process as per the GDPR.

4. What personal data do we process, for what purposes and on what legal basis?

4.1

In order for us to provide our services to you, we require certain personal data from you. We collected the following personal data for the various data subjects:

Data Subject	Personal Data	Purpose of Processing	GDPR Legal Basis	Recipient	Retention	Transfer outside EEA
Consortium partners	Name, email, phone, organisation, expertise	Project implementation, communication, reporting	Art. 6(1)(b) GDPR (performance of contract); Art. 6(1)(f) GDPR (legitimate interests)	Consortium partners, REA where required	Project duration + 5 years	No
Secondment applicants / participants	Name, email, education, expertise, cybersecurity knowledge, LinkedIn	Evaluation of applications, organisation of secondments, mentoring, reporting	Art. 6(1)(a) GDPR (consent); Art. 6(1)(b) where applicable	Consortium partners	Same	No

Survey respondents	Survey responses, demographic information, expertise	Research, evaluation, project monitoring	Art. 6(1)(a) GDPR (consent)	Consortium partners	Same	No
Newsletter subscribers	Name, email	Sending project news	Art. 6(1)(a) GDPR	Brevo	Until consent withdrawn	No
Website visitors	IP address, browser, cookies	Website security, analytics	Art. 6(1)(a) GDPR (non-essential cookies); Art. 6(1)(f) GDPR (security)	Website hosting provider	See Cookies Policy	No

5. How long do we keep your personal data for?

5.1

For the above-mentioned purposes, your personal data will be kept for five years after the project ends (December 2028 until December 2033). To satisfy its legal obligations or in order to have the necessary elements to assert its rights, BILISIM VADISI TEKNOPARK YONETICI AS will be able to retain the data for another ten years under the conditions established by applicable rules and regulations.

6. Who are the recipients of your personal data?

6.1

In the context of such processing, the recipients of all or part of your personal data will be the personnel of BILISIM VADISI TEKNOPARK YONETICI AS (Türkiye) and WOMEN4CYBER MARI KERT - SAINT AUBYN FOUNDATION (Belgium) in charge of dissemination and communication, and hosting the WEM Cyber website in Belgium.

7. Is your personal data transferred out of the european economic area?

7.1

As part of the implementation of the WEM Cyber project, certain personal data may be transferred from the European Economic Area (EEA) to BILISIM VADISI TEKNOPARK YONETICI A.S. in Türkiye, which acts as the project coordinator and data controller.

7.2

As Türkiye is not currently subject to an adequacy decision adopted by the European Commission under Article 45 GDPR, any transfer of personal data from the EEA to Türkiye will be carried out in accordance with Chapter V of the GDPR and will be subject to appropriate safeguards. Where required, such safeguards may include the European Commission's Standard Contractual Clauses (SCCs) or another lawful transfer mechanism under the GDPR.

7.3

We will take appropriate technical and organisational measures to ensure that your personal data remains protected throughout the transfer and subsequent processing and that your rights under the GDPR continue to be respected.

8. Individual data subject rights

8.1

Applicable data protection laws provide certain rights in favour of you as a data subject,

such as the right:

- of a data subject to receive detailed information on the processing (by virtue of the transparency obligations on the controller);
- of access to personal data;
- to rectify or erase personal data (right to be forgotten);
- to restrict processing;
- of data portability;
- to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; and
- to object to automated decision making, including profiling, and where we rely on its legitimate interests to process your personal data (for example, for marketing purposes).

8.2

You may make a request to us to exercise any of the above rights by contacting the Data Protection contact listed in paragraph 1.3. Your request will be dealt with swiftly in accordance with data protection law.

9. Data security and data breach

9.1

We have technical and organisational measures in place to protect personal data from unlawful or unauthorised destruction, loss, change, disclosure, acquisition or access. Personal data are held securely using a range of security measures including, as appropriate, IT measures such as encryption, and restricted access through approvals and passwords.

9.2

The GDPR obliges data controllers to notify the relevant data protection supervisory authority and affected data subjects in the case of certain types of personal data security breaches. Any data breaches identified in respect of personal data controlled by us will be dealt with in accordance with data protection law and our internal data breach procedure.

10. Further information and complaints procedure

10.1

For further information about this Policy and/or the processing of your personal data by or on behalf of BILISIM VADISI TEKNOPARK YONETICI AS please contact the representative listed in paragraph 1.3.

10.2

Our website may link to third-party platforms and websites, such as forms or booking systems. Please note that this Privacy Policy applies only to our website, and we encourage you to review the privacy policies of any third-party services you access or use through it.

10.3

While you may make a complaint in respect of our compliance with data protection law to the relevant data protection supervisory authority in your jurisdiction, we request that you contact BILISIM VADISI TEKNOPARK YONETICI AS (at the contact listed in paragraph 1.3) in the first instance to give us the opportunity to address any concerns that you may have.

11. Contact information

If you have questions or comments about this Policy, please contact us at:

coo.wemcyber@bilisimvadisi.com.tr

Date: 22 July, 2026