

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA

Pursuant to Articles 13 and 14 of Regulation (EU) 2016/679 – GDPR

Dear participant,
pursuant to Article 13 of Regulation (EU) 2016/679 (“GDPR”), the **Euro-Mediterranean Center on Climate Change Foundation (CMCC)** informs you how your personal data will be processed within the research project “**Sustainable forest management in Finland**”, carried out under the Horizon Europe project PRUDENT (Principal Investigator Prof. Jacopo Bonan: jacopo.bonan@cmcc.it).

1. Data Controller and Data Protection Officer (DPO)

The **Data Controller** for the data collected in this research is the **Fondazione CMCC**, registered office at Via Marco Biagi 5, 73100 Lecce (Italy), VAT/Tax code 03873750750, e-mail: privacy@cmcc.it.

CMCC has appointed a **Data Protection Officer (DPO)**, who can be contacted at: dpo@cmcc.it.

2. Categories of data, purposes and legal basis

Purpose

Data are processed to carry out the research project described in the information sheet, strictly to the extent necessary for that purpose (scientific research).

Categories of data processed by CMCC

Identification and contact data

- self-selected nickname (a pseudonym used to link responses across the different blocks without name or surname);
- e-mail address: collected only where you give optional consent to be re-contacted (see Section 3).

Research data (pseudonymised)

- age band; level of education; gender; household income band;
- size of the forest property and degree of involvement in forest management;
- sustainable forestry practices adopted;
- opinions and attitudes regarding biodiversity, climate change and environmental policies;
- answers to knowledge quizzes;
- decisions taken during the behavioural game and expectations about other participants' behaviour;
- preferences regarding different environmental policies and future intentions to adopt sustainable practices;
- forest-management decisions recorded through

Legal basis

Processing is based on the **data subject's consent** under Article 6(1)(a) GDPR. Failure to provide consent makes participation impossible. Consent to e-mail re-contact (Section 3) is optional and separate: withholding it does not affect participation.

You may withdraw your consent at any time by writing to dpo@cmcc.it or to the Principal Investigator. Withdrawal prevents further participation but does not affect the lawfulness of processing carried out beforehand; data already collected, if no longer attributable to you, may be used in the project.

3. Processing methods and retention

Data are processed in accordance with the principles of lawfulness, fairness, transparency, relevance and minimisation (Art. 5 GDPR), using IT tools ensuring security and confidentiality.

Pseudonymisation. Research data are collected and stored in pseudonymised form: participants are represented solely by a coded study identifier (the nickname). The experimental database contains no names, e-mail addresses or payment data.

Retention of research data. Pseudonymised research data are retained by CMCC for **10 years** after the end of the project, a period justified by the scientific verifiability and reproducibility requirements set out in the project's Data Management Plan.

Retention of the e-mail address. Where consent to re-contact is given, the e-mail address is stored separately from the research data, used solely to send a maximum of two invitations (approximately at 6 and 12 months) and

deleted after the second contact and in any case within 12 months of the session, unless consent is withdrawn earlier.

Place of processing. Personal data will not be transferred abroad to countries or international organizations outside the European Union that do not guarantee an adequate level of protection recognized under Article 45 of the GDPR, based on an adequacy decision of the EU Commission. In case it becomes necessary, the transfer of personal data to countries or international organizations outside the EU, for which the Commission has not adopted any adequacy decision under Article 45 of the GDPR, will only take place if adequate safeguards are provided by the recipient country or organization, in accordance with Article 46 of the GDPR, and provided that data subjects have enforceable rights and effective remedies. In the absence of an adequacy decision of the Commission under Article 45 of the GDPR, or adequate safeguards under Article 46 of the GDPR, including binding corporate rules, cross-border transfers will only take place if one of the conditions indicated in Article 49 of the GDPR is met.

4. Data recipients

Processor (Art. 28 GDPR). The Athens University of Economics and Business (AUEB) programmes and hosts the digital platform used for the information notice, consent, coded registration, initial survey and final questionnaire, acting on the Controller's instructions as a processor under Art. 28 GDPR (established within the EEA).

Disclosure to EFI (independent controller). Recruitment, organisation of in-person sessions and compensation are handled by the European Forest Institute (EFI), which processes the related data (including any correspondence between identity and study identifier) as an **independent controller**. CMCC does not receive the participant name lists. Where consent to re-contact is given, the e-mail address may be disclosed to EFI, which sends the follow-up questionnaire invitations.

Dissemination. Results will be published or presented only in anonymous and aggregate form. Personal data will not be transferred to third parties during or after the research, except as indicated above.

5. Rights of the data subject

Under Articles 15-22 GDPR you have the right to request from the Controller access to your personal data, rectification, erasure, restriction of processing, as well as to object to processing and to obtain data portability, in the cases provided for.

Requests should be addressed to the CMCC Data Protection Officer: dpo@cmcc.it or to the Privacy Department: privacy@cmcc.it.

6. Right to lodge a complaint

If you consider that the processing of your data infringes the GDPR, you have the right to lodge a complaint with the Italian Data Protection Authority (Garante per la Protezione dei Dati Personali) under Art. 77 GDPR, or to bring the matter before the competent courts under Art. 79 GDPR.