

XR ERA Privacy Policy

Welcome to XR ERA, a community that promotes closer collaboration between players in the field of extended reality (XR) in academia. XR ERA website and other services are owned and controlled by the Centre for Innovation (“CFI”) of Leiden University, ICTE Innovation Program (“Leiden University”).

This privacy policy (“Privacy Policy”) applies to all personal information collected through and/or processed in connection with the website <http://xr-era.eu> (the “**Website**”), the community platform offered by XR ERA (“**Community Platform**”) and verbal, email, text and other electronic messages between you, our Website and/or XR ERA’s personnel, including our newsletter (collectively referred to as the “**XR ERA services**”).

This Privacy Policy has been developed by the CFI, so when we mention “XR ERA”, “we”, “us” or “our” in this Privacy Policy, we are referring to the Centre of Innovation of Leiden University. In this Privacy Policy, we inform you of our practices with respect to the collection and use of your personal information when using the XR ERA services. Unless otherwise defined in this Privacy Policy, terms used here starting with a capital letter shall have the same meaning as in our [Terms of Services](#). All additional terms, guidelines, and rules, including our Terms of Services, are incorporated by reference into this Privacy Policy. We may act as a data controller or data processor within the meaning of the General Data Protection Regulation (GDPR).

This privacy policy explains, among other things, the following topics:

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Within the XR ERA services, you may come across links to other websites, apps and services, or applications that allow you to share information with other websites, apps and services. We are not responsible for the privacy practices of these other websites, apps and services and we therefore recommend that you review the privacy policies of those websites, apps or services before accessing or using them.

If you do not agree to the provisions of this privacy policy, you should not use the XR ERA services.

Our principles of privacy

At XR ERA, the users and members come first, and we believe that you should know what information we collect about you, why we do it and how we use and share it. That is why we have created this Privacy Policy to provide you with simple, clear, and actionable information about our privacy and data protection practices.

We believe that users and members of XR ERA should have meaningful choices about the information we collect, use, and share as described in this Privacy Policy. This information will be accessible to you, either online through our Privacy Policy or direct request to the Data Protection Officer of the Centre.

Information We Collect

The personal data we collect is related to the provision of the XR ERA services and its functions and falls under three general categories:

- Information provided by you;
- Information We Collect Automatically;
- Information we obtain from outside sources.

Nonetheless, in keeping with the principle of data minimisation, we aim to collect as little personal data as possible and only that data which is necessary for us to carry out our work.

Information provided by you

When you use or intend to use some of the XR ERA services, we request and collect the personal data below. These data are necessary for the adequate performance of the services provided to you and for compliance with our obligations arising from our [Terms of Service](#).

We may also process this data in the context of our legitimate interest to improve the XR ERA services and provide our users and members with the best experience. Without this information, we may not be able to provide you with all the requested services and functions on the XR ERA services.

You do not need to be a member of XR ERA to visit or use our Website. However, some services require you to provide us with certain information:

- **Membership of XR ERA** - If you want to become a member of XR ERA, we will ask you to provide us with personal information, such us:
 - your real name;
 - your email address;
 - your organization;
 - your job title, position, or role.
- **Newsletter subscription** – If you subscribe to the XR ERA newsletter, we will collect personal information, such us:
 - your name;
 - your email address;
 - your organization.
- **Contributing Members / Frontrunner’s Website Public Profile** – As a Contributing Member or Frontrunner of XR ERA, you can provide additional information to be part of your Website Public Profile (This data is publicly accessible and can be seen by anyone who visits the website), for example:
 - the city and/or country where you live;
 - your job title, position, or role;
 - a profile picture, an image above your profile;
 - your bio;
 - links to your personal or institution’s websites and/or social media profiles.
- **Messages** - When you communicate with XR ERA by email or through the Community Platform, or use the Community Platform to communicate with others, we collect data about your communications and any information you provide.
- **Job Applications** – If you apply for a job with us, we may collect personal data such us your name, address and contact details, including email address and telephone number, details of your qualifications, skills, experience and employment history, information about your current level of remuneration, including benefit entitlements and all the information included in the CV you send us.
- **Survey Information** - If you participate in a survey, you may provide certain personal information as part of your response unless you respond anonymously.
- **Information or publications that you post on the Website or the Community Platform** - You may provide personal information when you upload files, when you comment or contribute to group discussions on the Website or the Community Platform.

Information we collect automatically

We collect certain data automatically when you use the XR ERA services. This data typically includes:

- **Website Usage Data** - We use cookies and other similar technology to collect aggregated data about the users’ interaction with the Website, such us the pages they visit, source where they have come from, the links they click, approximated location based on IP address, frequency and duration of their visits to the Website.
- **Community Platform Usage Data** – Our Community Platform automatically collects aggregated data about the members’ interaction with the Community Platform, expressed as statistics about their engagement and activity, such us posts, replies, meetings, mentions and reactions.

Information from outside sources

- **Service providers** - We may also receive information about you through our service providers, including companies that assist with analytics, data processing and management, account management, hosting, and technical services, content moderation and other services that we use to provide the XR ERA services. Below we explain in detail how we use this data and who our third-party providers are.

How we use your data

We use the personal data we collect from you, automatically or from outside sources, for a number of different purposes based on different legal bases for processing.

- **To provide you with the XR ERA services**
 - We use your name, organization, job title/position/role and email address in order to enrol you and recognize you as a Member of XR ERA. We process this data on the basis of your consent and for our commitments to you under our [Terms of Service](#) or other agreements with you or is necessary to administer your membership.
 - Your email address will be also used to send you service updates and notifications about your membership and to respond to a comment or question you have submitted.
 - We use your name, email address and organization (optional) when you subscribe to our newsletter to send you our newsletter and other important communications. We process this data on the basis of your consent. You can unsubscribe from our newsletter at any time you want.
 - When you are a Contributing Member or Frontrunner of XR ERA, we will use the voluntarily additional information that provide us in order to create and share your Website Public Profile. We process this data only on the basis of your consent. You can request us to delete or modify your Website Public Profile and the data you provide us at any time you want.
 - We collect and store the data you share with us and other members within the Community Platform in order to maintain and supervise the XR ERA Community Platform environment. You are free to be part and participate in the Community Platform (and to not do it). The Community Platform Moderators will oversee and control the content published therein based on the Community Guidelines, and can take actions such as adding, removing, or changing the location of your posts, messages, files, or other communications if necessary. We process this information on the basis of your consent, for the adequate performance of our commitments to you and our legitimate interest of maintaining a community.
- **To maintain, protect and improve the XR ERA Services**

We may process personal data with the purpose of maintaining, protecting, and improving the XR ERA Services. We mainly process this data for the adequate

performance of our commitments to you under our [Terms of Service](#). In addition, we may process this data out of our legitimate interest, to improve the XR ERA services and to provide our users and members with the best experience; and based on a legal obligation. The main purposes for this processing are:

- We may conduct surveys and research, test features that are being developed, and analyse the data we have to review and improve our services, develop new features, perform audits, and troubleshoot problems.
 - Detecting and preventing fraud, spam, abuse, security incidents and other suspicious activities.
 - Checking and authenticating your identity and preventing unauthorized or illegal activities.
 - Improving the safety and security of our services.
 - Preventing or taking action against activities that may or may not violate our Terms of Service, Community Guidelines, or applicable law.
 - Complying with our legal obligations;
 - Protecting the rights and property of the CFI and Leiden University;
 - Providing technical support.
- **To communicate with you.**

For example, by emailing you to ask for your feedback, share tips for getting the most out of our community, or keep you up to date on XR ERA services. If you do not want to hear from us, you can opt out of our communications at any time.

- **To recruit new XR ERA Members, Ambassadors or Partners.**

For example, by evaluating possible new Members, Ambassadors or Partners for XR ERA and communicating with them.

- **Other purposes.**

In addition, we may use your data for other purposes, provided that we disclose the purpose and use to you in a timely manner and that you consent to the proposed use of your personal data. Which of your data we process based on your consent depends on the purpose of your consent.

Sharing your data

This section describes how the information collected or generated as a result of your use of the XR ERA services may be shared by you or by us.

- **Through your profile on the Community Platform** - The information you decide to share in your profile within the Community Platform is accessible to other members and users of the Community Platform. They can view your profile information, consistent in the information you decided to share.

- **Through your profile on the Contributing Members / Frontrunner’s Website Public Profile** - All information on your Website Public Profile is accessible to other users of the Website. They can view your profile information, consistent in the information you voluntarily decided to provide us with. Your Website Public Profile information is just that — public — so please keep that in mind when deciding what information you would like to include.
- **Other data shared with your consent** - We may disclose your information for other necessary purposes, provided you have agreed that we may do so. When we collect your data, we will make you aware of this, as well as the purposes of sharing the data.
- **Service Providers** - We use and share your information, including personal data with some of our service providers in order to ensure that the XR ERA services are properly performed. For example, we work with service providers of cloud storage (that help us to store data), postal and email delivery (that help us stay in touch with you), hosting providers (for hosting our website), analytics providers (that help us understand and enhance our Services), programs that help us with task management, scheduling, word processing, email and other communications, and collaboration among our team. Some of service providers may be located outside the European Economic Area (“EEA”), to provide services to us or to our members on our behalf. These service providers have access to information about you only to provide their services on our behalf and are contractually obligated to take appropriate organizational and technical security measures to protect personal data from unauthorized disclosure and to only process personal data in accordance with our instructions and to the extent that this necessary to provide their services to us. These service providers are usually only allowed to process your data on our behalf under special conditions.
- **Third-party applications** - If as a Member you want to be part of the Community Platform, you may share some information with the third-party application being used for that matter. Currently, XR ERA is using **Microsoft Teams** as Community Platform Provider. To be part of the Community Platform we share your email address with Community Platform Provider. If you do not want this information to be shared with Microsoft, but you want to be part of the Community Platform contact us in order to look for an alternative.
- **Compliance with Laws** - We may provide your information to courts, law enforcement agencies and government authorities (i) to comply with our legal obligations, (ii) to comply with legal process and in response to claims against CFI, (iii) in response to verified request in connection with a criminal investigation or any suspected or suspected illegal activity or any other activity that places us, you or any of our other users legally liable, (iv) for performing or applying our Terms of Service and other agreements with users or (v) to protect the rights, property or personal safety of CFI and Leiden University, its employees and outsiders.

You can find our authorized partners and service providers (data processors) [here](#).

Information security

We take appropriate technical, administrative and physical precautions designed to prevent unauthorized access, use or disclosure of the personal data collected or stored by us and ensures an appropriate level of security for risks to the rights and freedoms of natural persons

who may be involved in our processing activities. We regularly check our systems for possible vulnerabilities and attacks. However, it is not possible to guarantee the security of information transmitted over the Internet. You use the XR ERA services and provide us with information at your own discretion and risk.

International data transfers

Some of our service providers may be located outside the European Economic Area (“EEA”), and we share your information with them for the purposes described in this privacy policy. For example, data collected within the EEA may be transferred to countries outside the EEA for the purposes described in this privacy policy. We use appropriate safeguards, such as the standard [contractual clauses](#) approved by the European Commission or, if required, additional measures to ensure the lawful transfer of your personal data outside the EEA.

Children

The XR ERA services are not intended for use by children. Persons under the age of 16 in the EEA or 13 years of age in the United States and the rest of the world should not use the XR ERA services or provide personal information to us. We never knowingly collect personal information from anyone under the age of 16 or 13, as the case may be, nor do we authorize them to be members of XR ERA. If we learn that we have collected personal information from a person under the age of 16 or 13, as the case may be, we will delete that information as soon as possible. If you think we may have collected such personal data, please let us know immediately at c4idataprotection@sea.leidenuniv.nl.

Exercising your privacy rights

You can exercise the rights described in this article by contacting us at c4idataprotection@sea.leidenuniv.nl. Please note that if you have reasonable doubts about your identity, we may ask you to verify your identity before taking any further action on your request.

- **Access and transferability of data**
 - You have the right to find out whether or not your personal data is being processed by us and, if that is indeed the case, to inspect that personal data. You may also have the right to request copies of your personal data held by us.
- **Change or correct data**
 - You have the right to ask us to correct, change, update or rectify your data.
- **Retain and delete data**
 - We usually keep data for as long as necessary to provide you with the XR ERA services.
 - You have the right to ask us to erase all or part of the personal data we hold about you. If you are a member, you can resign your membership at any time.
 - We may also need to keep certain personal data after you resign your membership if this is reasonably necessary to comply with our legal

obligations (for example, under applicable tax or commercial law or to prevent fraud or abuse and improve security). After that, we will delete the data immediately, unless we have to keep the data until the expiry of the statutory limitation period in order to be able to provide evidence in civil claims or due to legal storage obligations (for example for accounting reasons).

- **Objection to processing**
 - You have the right to object at any time to the processing of your personal data for reasons related to your specific situation (in particular when the data processing is not necessary to comply with a contractual or other legal requirement or when we transfer the data use based on our legitimate interest).
- **Restricting Processing**
 - Under certain circumstances, you may have the right to limit the way we use your personal data.
- **Revoke consent**
 - If you grant us permission to process your personal data, you can withdraw your consent at any time by sending us a notice stating the specific consent you are withdrawing.
- **File complaints**
 - You have the right to complain to a competent data protection authority about our data processing activities. We are under the supervision of the Dutch Data Protection Office.

Contact information

If you have any questions or complaints about this Privacy Policy or our practices, please contact our Officer by email at c4idataprotection@sea.leidenuniv.nl.

Changes to this Privacy Policy

We may update this privacy policy from time to time and at our sole discretion. If we change this Privacy Policy, we will post the revised Privacy Policy on the Website and update the "Last Modified" date below. Please check this page periodically to make sure you are aware of any changes to this Privacy Policy. Members will be notified of substantial changes to this Privacy Policy by means of a notice to their emails / or by posting a notice of the change on the website. Your visits to the Website or use of the XR ERA services after the effective date of those changes are subject to the revised Privacy Policy.

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