



## ARMOUR

### A radical model of resilience for young minds

# Privacy Policy

The present document contains the privacy policy provided by the ARMOUR Consortium with respect to the management and administration of the ARMOUR website accessible via <https://armourproject.eu/> (Privacy Policy) and it regulates the data protection mechanisms provided by the ARMOUR Consortium to any user of the information services and content accessible through the ARMOUR website.

The ARMOUR website is developed, managed and administered by the ARMOUR Consortium via LIBRe Foundation.

Should any questions or concerns regarding the present Privacy Policy occur, you can contact the ARMOUR Consortium via Euro-Arab Foundation for Higher Studies (Spain) acting in the capacity of a coordinator and official representative of the ARMOUR Project, or via LIBRe Foundation using the following email address: [office@armourproject.eu](mailto:office@armourproject.eu) or the contact form provided at <https://armourproject.eu/signal>.

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This project was funded by the European Union's Internal Security Fund — Police, under Grant Agreement No. 823683.



For the purposes of the application and interpretation of the present **Privacy Policy**, the terms and phrases used have the following meaning:

- ❖ 'A RADICAL MODEL OF RESILIENCE FOR YOUNG MINDS — ARMOUR' Project (the ARMOUR Project) is a project funded by the European Union's Internal Security Fund — Police under Call ISFP-2017-AG-RAD "Call for projects on preventing and countering violent radicalisation" and implemented under Grant Agreement No. 823683 within the 01/01/2019 – 31/12/2020 (24 months) period;
- ❖ ARMOUR Consortium is the ARMOUR Project Consortium, formed by the following beneficiaries (partners) acting jointly as a consortium under Grant Agreement No. 823683: Euro-Arab Foundation for Higher Studies (Spain) acting in the capacity of a coordinator and official representative of the Project, Center for Security Studies - KEMEA (Greece), "Mihai Viteazul" National Intelligence Academy (Romania), SYNNO GmbH (Austria), Ministry of Justice (Italy), Agenfor International Foundation (Italy), LIBRe Foundation (Bulgaria), University of Malta (Malta), and University of Groningen (Netherlands);
- ❖ the ARMOUR website is developed, managed and administered by the ARMOUR Consortium via LIBRe Foundation, where LIBRe Foundation is a foundation, non-profit organization, established and operating in accordance with the laws of the Republic of Bulgaria, registered under company file No. 220/2015 as docketed in the Register of Non-Profit Legal Entities by the Sofia City Court, UIC BULSTAT 176860854, with seat and address of management: 64, Dimitar Petkov Str., Ent. B (B), Floor 3, 1309 Sofia, Bulgaria; a Partner in the ARMOUR Consortium.



## Your Privacy

The [General Data Protection Regulation](#) (GDPR) which became applicable in the territory of the European Union since 25<sup>th</sup> May 2018 aims to protect your basic rights and freedoms as users of the services offered via the ARMOUR website by setting requirements and measures in order to ensure your personal data protection at any given time.

As a data controller for the personal data processed through the ARMOUR website, LIBRe Foundation deeply believes that protecting your privacy and other fundamental rights and the integrity and confidentiality of your personal data is an integral part of the values and the aims of the ARMOUR Project.

One of your rights under EU law is that you must be informed when your personal data - also known as personal information - is processed (collected, used, stored, deleted and so on) by any organisation, including the institutions and bodies of the EU. You also have the right to know the details and purpose of that processing.

Some of the services offered through the ARMOUR website require the processing of your personal data. The present document gives you information about the compliance measures we have taken to protect your rights and freedoms while respecting the principles of lawful, transparent and honest processing of personal data.

Here you can find out what kind of personal data we process, for what purposes and under what terms, with whom and under what conditions we share them. You can also read about how you can access your personal data and exercise the full amount of rights guaranteed by the General Data Protection Regulation.

Here we give you a general overview of some of the ways this website processes your personal data including the use of cookies and social media.

**At any time, you may exercise your right of objection to the processing of personal data relating to you by contacting us directly.**



## Your Personal Data and the ARMOUR website

- LIBRe Foundation collects your personal information for the sole purpose of facilitating the provision of services through the ARMOUR website.
- We do not reuse the information for another purpose that is different to the one stated.
- We put in place measures to guarantee that your data are kept up-to-date and processed securely.
- We will never divulge your personal data for direct marketing purposes.
- You have the right to access your personal information, to have it corrected and the right to recourse; at any time if you believe your data protection rights have been breached.
- We do not keep your personal information for longer than necessary for the purposes for which we collected it.
- However, we may keep your information for a longer period for historical, statistical or scientific purposes with the appropriate safeguards in place.

### Personal data necessary for access to the ARMOUR website's Intranet Section

The following personal data are processed only for the purposes of providing access to the Intranet Section of the ARMOUR website for registered Team Members of the ARMOUR Consortium.

- Team Member Code - an identifier generated by the data controller used for initial registration of a Team Member, necessary to provide access to the Intranet Section of the ARMOUR website for Team Members of the ARMOUR Consortium (processed on the ground of Art. 6(1)(b) of GDPR);
- Name – we will only process your name for the purpose of registration and further personalization of the communication between you, as a Team Member, and us, as a data controller as well

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as using it in an official correspondence. This will also enable other Team Members to see your name and to address you personally (processed on the ground of Art. 6(1)(b) of GDPR);

- Email – we need your email address for the initial registration of a Team Member in order to provide access to the Intranet Section of the ARMOUR website for ARMOUR consortium members and in case you consented to receive a newsletter in which case it will be used in order to send the newsletter to you (processed on the ground of Art. 6(1)(b) of GDPR);
- Password – we use it to protect the Team Member Account against tampering and unauthorised access (processed on the ground of Art. 6(1)(f) of GDPR);
- Personalized Picture/Photo – if you decide to provide your personalized photo, we will only process it for the purpose of displaying a photograph which is visible to other Team Members with access to the Intranet Section of the ARMOUR website (processed on the ground of Art. 6(1)(a) of GDPR);
- Title – if you decide to provide your us with a title to address you, it will only be used to address the person officially in official correspondence (processed on the ground of Art. 6(1)(a) of GDPR);
- Field of Work – if you decide to provide us with information about your field of work, we will only process it for the purpose of providing professionally-oriented information to other Team Members of the Intranet Section of the ARMOUR website by making it visible for them (processed on the ground of Art. 6(1)(a) of GDPR);
- Place of Work – if you decide to provide us with information about your place of work, it will be processed only for the purpose of providing professionally-oriented information to other Team Members of the Intranet Section of the ARMOUR website by making it visible to them (processed on the ground of Art. 6(1)(a) of GDPR);
- Position – if you decide to provide us with your position, it will be processed only for the purpose of providing professionally-oriented information to other Team Members of the Intranet Section of the ARMOUR website by making it visible to them (processed on the

ground of Art. 6(1)(a) of GDPR).



## Your Rights

### Right to access

You have the right to ask us for copies of your personal information. This right always applies. You can make a subject access request to find out what data is held and how it is used by using [our contact form](#). Please identify the following:

- what kind personal data you want to access, or would you like to access all the personal data you have for you;
- your name and contact details; and
- if you need the data in a specific format.

We may refuse your access request if your data includes information about another individual, except where the other individual has agreed to the disclosure, or it is reasonable to provide you with this information without the other individual's consent.

We are going to provide the requested information in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### Right to erasure

You have the right to ask us to erase your personal information in certain circumstances. This is your so called 'right to be forgotten'. If you want to exercise this right of yours contact us via [our contact form](#) and let us know what you want to be erased.

This right is not absolute so make sure your case follows under one of the following circumstances:

- we do not need your data anymore (example: you do not work for

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one of our Partners anymore);

- you initially consented to the use of your data, but have now withdrawn your consent (have in mind that this applies only to the personal data we process on the ground of your consent);
- you have objected to the use of your data, and your interests outweigh ours;
- we have a legal obligation to erase your data;
- you suspect we have used your data unlawfully.

If your request meets one of the above scenarios we will erase your data. We can refuse to erase your data on one of the grounds in Article 17(3) of the General Data Protection Regulation, namely if your data is necessary for reasons of:

- freedom of expression and information;
- legal obligation to keep your data;
- public health;
- establishing, exercising or defending legal claims;
- when erasing your data would prejudice scientific or historical research, or archiving that is in the public interest.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### Right to rectification

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. This right always applies.

If you want to exercise this right of yours contact us via [our contact form](#) and let us know what you want data you consider incorrect and how you want it to be amended.

When we receive your request, we are going to investigate the issue and either correct it or inform you why we consider the data accurate. We can also refuse on the ground of your request being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources.

If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one month period.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### Right to restriction of processing

You have the right to ask us to restrict the processing of your information in certain circumstances. It may involve asking us to stop processing your data for a certain period of time, stop us processing your data in a certain way or even stop us deleting your data. In any circumstances you can exercise your right by using [our contact form](#).

You may ask us to temporarily limit the use of your data when we are considering:

- a challenge you have made to the accuracy of your data;
- an objection you have made to the use of your data.

You may also ask us to limit the processing of your data but not deleting it if:

- processed your data unlawfully but you do not want them deleted;
- we no longer need your data but you want us to keep it in order to create, exercise or defend legal claims.

What we will do to restrict the use of your data may include:

- temporarily moving your data to another system;
- making the data unavailable to users;
- temporarily removing it from the ARMOUR website.





We will securely store your data and not use it unless:

- you give us your consent to do so;
- the data is needed for legal claims;
- the data is used is to protect another person's rights;
- the data is used is for reasons of important public interest.

We can refuse your request on the ground of being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources. If your request is justified, we are going to erase your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation. In some cases we may need some extra time for investigation up to two more months but we will let you know about the delay in the initial one month period.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### **Right to object to processing**

You have the right to object to processing if we process your information on the ground of our legitimate interests.

If you feel we should stop processing your data on this ground, you can contact us and justify your reasons using [our contact form](#).

Note, however, that we may continue legitimately use your despite your objection if we can prove we have a strong reason to process your data that overrides your objection.

If your request is justified, we are going to stop processing your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

### **Your right to data portability**

You have the right to get your personal data from us in a way that is accessible and machine-readable. This right may seem similar to your right to access but it is only applicable to

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- data that is held electronically;
- data you have provided to the organization.

Data you have provided does not just mean information you have typed in, such as a username or email address. It may also include such things as website or search usage history or traffic and location data.

If you want to exercise this right of yours contact us via [our contact form](#), indicating what kind of data you would like to receive from us in a machine-readable format.

Before sending you this data we may need to confirm your identity in order to prevent fraud and other people getting access to your data. Then we will provide it in the required format.

If your request is justified, we are going to stop processing your data in the one-month term specified in Article 12(3) of the General Data Protection Regulation.

We can refuse your request on the ground of being “manifestly unfounded or excessive” which means it will cost us a significant amount of money or it will take a vast amount of resources. It can happen for example in case of a repetitive requests.

If you are unhappy with the result, please first get back to us so that we can investigate the matter further.

**If you were not able to exercise one or more of your rights, you may contact the Bulgarian Commission for Personal Data Protection and submit your complaint via:**

Address: 2 Prof. Tsvetan Lazarov Blvd., Sofia 1592

Phone number: +3592/91-53-518

Email: [kzld@cpdp.bg](mailto:kzld@cpdp.bg)

Website: [www.cdpd.bg](http://www.cdpd.bg)

**Nevertheless, we advise you to try and contact us on the matter first.**





## Cookies

### What are 'cookies'?

The **cookie** is a small text file that can be stored on your computer when you visit websites. Certain information is saved in this text file, such as the choice of website language. When you visit the website again, this cookie is sent to the particular website. This way, the website recognizes your browser and may, for example, save your language preferences.

Cookies usually have an “expiration date” which indicates for how long they are kept on your device. For example, some cookies are automatically deleted when you close your browser (so-called session cookies) while others stay on your device for a longer time, sometimes until you delete them manually - we call them permanent cookies.

### Why do we use 'cookies'?

As administrators of the ARMOUR website we use two types of cookies:

- cookies that ensure specific functions of the website work properly;
- cookies that are used for analytical purposes.

We use custom made platform to keep the content and services provided through the ARMOUR website up-to-date. This software uses the so-called cookies to provide specific functionality which means that they are necessary for the proper functioning of the website and therefore you cannot refuse the placement of these cookies on your device if you want to visit and use the services of our website.

We use [Google Analytics](#) for analytical purposes. As a user navigates between web pages, Google Analytics provides website owners with specific JavaScript tags (libraries) to record information about the page a user has seen, for example the URL of the page (for more information, please visit [Google Analytics Cookie Usage on Websites](#) and/or read the [Google's overview of privacy and safeguarding data](#) for more details about the data collected by Google Analytics). This analytics tool installs the cookies we use to monitor the number of visits (traffic) on the website. This

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allows us to understand, for example, how many times a page has been visited. We only use this information to improve the content of our website or as a justification for launching a new campaign or service on a particular topic of great interest. User data is all anonymous.

The ARMOUR website also use [Twitter for Websites](#) - a suite of products that enable website publishers to integrate Twitter content into their sites. These products include embedded Tweets, embedded timelines, Tweet buttons, and follow buttons. The ARMOUR website is using only the Tweets option. When a user view Twitter content or Twitter products integrated into other websites using Twitter for Websites, Twitter may receive information including the web page the user visited, the user’s IP address, browser type, operating system, and cookie information. This information helps Twitter to improve our products and services, including personalized suggestions and personalized ads. Learn more about the information Twitter receives and how Twitter uses it in their [privacy policy](#) and [cookies use](#).

### What cookies do we use?

You can check the cookies we use and their function here.

- List of the **functional cookies** – if you want to use the ARMOUR website, you cannot refuse the placement of the following cookies, necessary for its proper functioning.

Name	Expiration date	First-party or third-party cookie	Purpose
XSRF-TOKEN (essential)	2 hours	First-party cookie	This is a session cookie and is written to help with site security in preventing Cross-Site Request Forgery attacks.
articles_voted_ids	1 hour	First-party cookie	This cookie is used to indicate whether a user has voted for an article during the 1-hour period and is used to avoid double or

			more voting by one and the same user within a single day.
creato_session (essential)	2 hours	First-party cookie	This is a cookie used to indicate whether the user is logged in in the website. If the user is logged in, the cookie contains information about the user ID. If the user is not logged in, the cookie contains information about an anonymous ID.
data-no-showcookiewarning (essential)	1 month	First-party cookie	These cookies are used to indicate whether the cookie warning message is open or closed.
cookie_msg (essential)	10 years	First-party cookie	
<p>You can block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.</p>			

- List of the **analytical cookies** – the following cookies may be refused, and you may continue to use the ARMOUR website and the services offered through it.

Name	Expiration date	First-party or third-party cookie	Purpose
_ga	2 years	First-party cookie	This cookie is used to help us count how many people visit our site by tracking if you've visited before.

_gid	24 hours	First-party cookie	This cookie is used to distinguish visitors via a visitor ID data.
_gat_gtag_UA_103987859_23	1 minute	First-party cookie	This cookie is used to throttle request rate and support the management of the rate at which page view requests are made.
<p>These cookies are used to collect information about how visitors use our website. We use the information to compile reports and to help us improve the website. The cookies collect information in an anonymous form, including the number of visitors to the website and blog, where visitors have come to the website from and the pages they visited. <a href="#">Read Google's overview of privacy and safeguarding data.</a></p>			

We make a link to our Twitter account available on our website, we also display recent Tweets using the Twitter api. Twitter may set cookies on your computer through our use of their api. [Read an overview of privacy at Twitter.](#) These cookies, provided by Twitter, are used in conjunction with the Twitter social plugins in order to allow following our Twitter account easily, share content via Twitter, and to display the latest tweet. Twitter makes use of cookies to improve its own service. They also help us measure and optimise the effectiveness of our online marketing campaigns and service you with advertisements that may be relevant to you and your interests.

### How to find out what cookies were placed on my device and how to delete them?

If you want to know what cookies are installed on your device or want to delete them, you can use your browser settings.

You can prevent your browser from accepting certain cookies, have the browser require your consent before a new cookie is placed in your browser, or block cookies altogether by selecting the appropriate settings on your browser privacy preferences menu. To avoid receiving cookies on

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the browser of your mobile device, you will need to refer to its user manual. For information on how to opt-out of cookies set by our suppliers, please visit the applicable links listed in the table above.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit [www.aboutcookies.org](http://www.aboutcookies.org) or [www.allaboutcookies.org](http://www.allaboutcookies.org).

The links below will help you find the settings for some common browsers:

- Manage cookie settings in [Chrome](#) and [Chrome Android](#) and [Chrome iOS](#)
- Manage cookie settings in [Safari](#) and [Safari iOS](#)
- Manage cookie settings in [Microsoft Edge](#)
- Manage cookie settings in [Mozilla Firefox](#)
- Manage cookie settings in [Microsoft Internet Explorer](#)
- Manage cookie settings in [Opera](#)

To find information relating to other browsers, visit the browser developer's website.

To opt out of being tracked by Google Analytics across all websites, visit <http://tools.google.com/dlpage/gaoptout>.

If you do not want Twitter to show you interest-based ads on and off of Twitter, there are several ways to turn off this feature:

- Using your Twitter settings, visit the Personalization and data settings and adjust the setting Personalize ads.
- If you are on the web, you can visit the Digital Advertising Alliance's consumer choice tool at [optout.aboutads.info](http://optout.aboutads.info) to opt out of seeing interest-based advertising from Twitter in your current browser.
- If you do not want Twitter to show you interest-based ads in Twitter for iOS on your current mobile device, enable the "Limit Ad Tracking" setting in your iOS phone's settings.
- If you do not want Twitter to show you interest-based ads in Twitter for Android on your current mobile device, enable "Opt out of Ads"

Personalization” in your Android phone’s settings.



## Social media

We use social media to present our work through widely used and contemporary channels. Our use of social media is highlighted on this website.

Cookies are not set by our display of social media buttons to connect to those services when our website pages are loaded on your computer (or other devices) or from components from those services embedded in our web pages.

Each social media channel has their own policy on the way they process your personal data when you access their sites. For example, if you choose to watch one of our videos on YouTube, you will be asked for explicit consent to accept YouTube cookies; if you look at our Twitter activity on Twitter, you will be asked for explicit consent to accept Twitter cookies; the same applies for Facebook.

If you have any concerns or questions about their use of your personal data, you should read their privacy policies carefully before using them.



## Newsletter

We need your email to be able to send you the ARMOUR Newsletter. If you do not confirm your email address within 3 days’ time, it will be deleted from our system. In case you confirm your email address finalizing the subscription process, it will be used for the purpose of receiving the ARMOUR Newsletter only. Our purpose for collecting the information is so we can provide you with a service and let you know about ARMOUR most recent activities.

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The legal basis we rely on for processing your personal data is your consent under article 6(1)(a) of the GDPR. We rely on your consent to process the personal data you provide to us for sending you this newsletter. You have the right to withdraw your consent, or to object to the processing of your personal data for this purpose at any time. You can do that by clicking on the 'unsubscribe' link at the bottom of each newsletter or by sending an email to: [office@armourproject.eu](mailto:office@armourproject.eu). If you do that, we are going to update our records immediately to reflect your preferences.

In case you do not consent to processing your email address for sending you the ARMOUR newsletter, you can still access the previous newsletter through the ARMOUR website.

*The present Privacy Policy is adopted with a decision of the LIBRe Foundation's director on behalf of the ARMOUR Consortium on 31 January 2019 prior to the launch of the ARMOUR website.*

*Any subsequent changes to the Privacy Policy shall be effective from the date indicated with the corresponding amendments.*

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