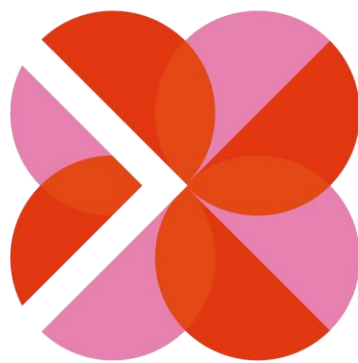
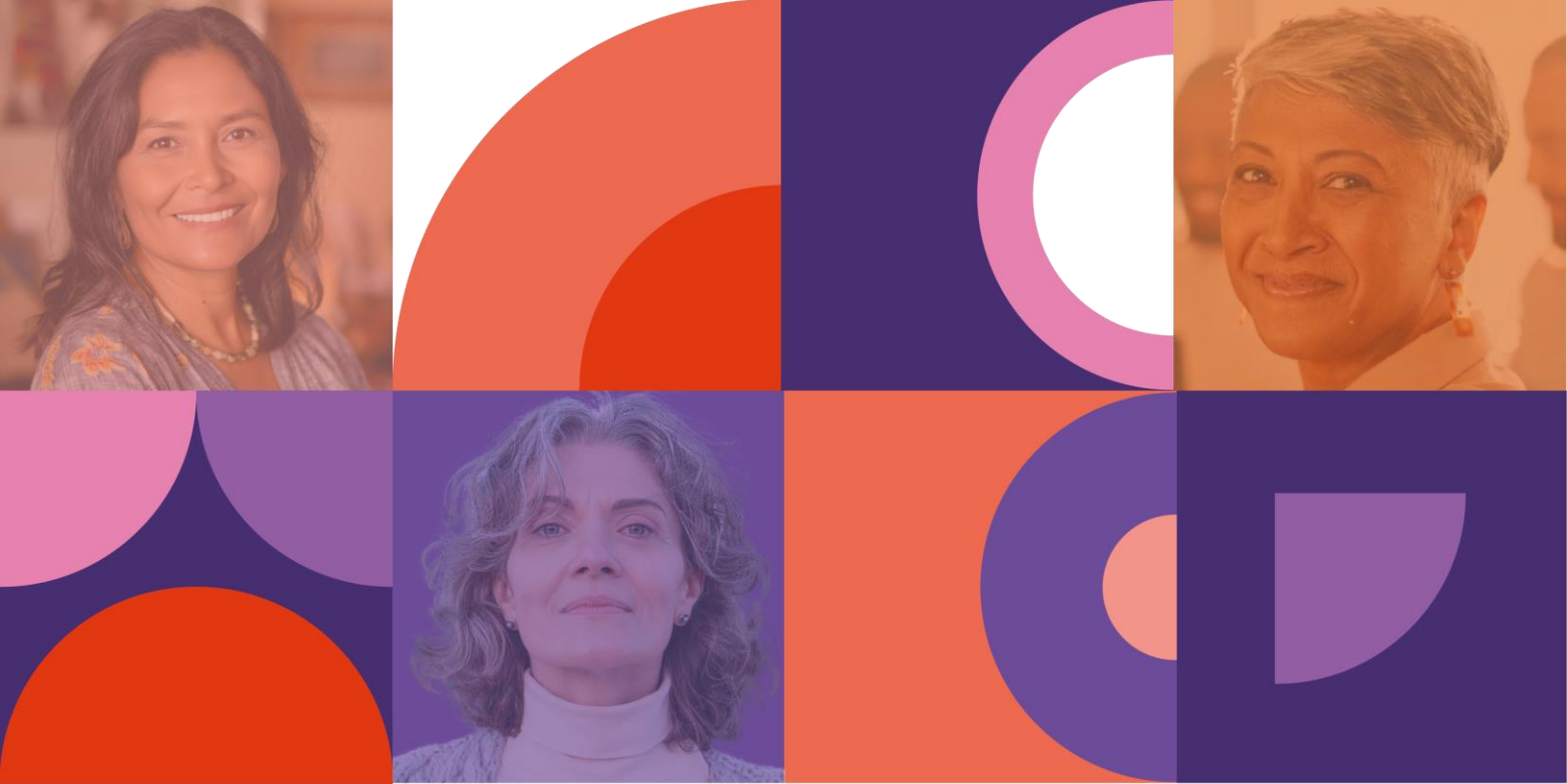




Hera

Helping Empower Women
through Reskilling and
Advancement

Privacy Policy

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RESHAPING
WORK

women in Tech Alliance



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Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the European Education and Culture Executive Agency (EACEA). Neither the European Union nor EACEA can be held responsible for them.

Operator: AINIGMA Technologies BV

Website: heracommunity.eu

The company 'AINIGMA TECHNOLOGIES' (hereinafter 'the Company') acts as the Data Controller and collects, stores, uses, processes, and routes personal data when a Data Subject visits, registers, or uses the HERA Community Platform and its subpages. HERA is a community platform dedicated to lifelong learning and empowerment for women aged 45 and above, fostering personal growth, connection, and digital inclusion.

As the protection of personal data is extremely important to our Company, this document defines our obligations, how we use, share and protect the data we receive, and how we can resolve any issue through communication between us.

★ **Erasmus+ / EU Obligation:** HERA is co-funded by the European Union under the Erasmus+ Programme (EU Grant Agreement No. [101196001]). The European Commission (EC) have specific legal rights to access, audit, and verify personal data processed under the grant agreement. This Privacy Policy reflects those obligations.

1. Definitions

Data Protection Legislation means any law relating to the processing of personal data, privacy, and security, including, without limitation, Regulation (EU) 2016/679 on the protection of natural persons (GDPR), Directive 2002/58/EC on privacy and electronic communication, as well as relevant regulations, directives, or guidelines of competent administrative authorities.

'Data Controller', 'Processor', 'Data Subject', 'Personal Data', and 'Processing' shall have the meanings attributed to them in the applicable Data Protection Legislation.

Personal Data means the entirety of personal data as defined under the applicable Data Protection Legislation, which is disclosed or made available to the Processor for the purposes of the respective communication, and/or which the Processor collects, stores, or otherwise processes on behalf of the Company.

Websites refers to the official HERA Community Platform, which maintains an electronic platform for facilitating lifelong learning, community engagement, and digital empowerment for women aged 45 and above.

Processing of Personal Data is any operation or series of operations performed with or without automated means on personal data, such as collection, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure by transmission, dissemination, alignment or combination, restriction, erasure, or destruction.

2. What Our Platform Does

The Controller, before delivering data to the Processor that falls within the scope of the relevant data protection legislation, must have obtained the consent required from the Data Subject for the transfer. The Company processes Personal Data for the purpose of providing the Services offered through the HERA Community Platform, using Personal Data only when strictly necessary for the fulfilment of its obligations in accordance with the Terms and Conditions.

The processing operations will last for the time necessary to complete the Services. At all times, Personal Data will be protected by the Company as Data Controller with the character of Confidential Protected Information.

★ **Erasmus+ / EU Obligation:** In its capacity as an Erasmus+ beneficiary, the Company is also required to process certain participant data for the purpose of reporting to the European Commission. This processing is based on the legal obligation arising from the EU Grant Agreement (Article 6(1)(c) GDPR).

3. Is It Mandatory to Provide Your Personal Data?

The provision of data to the Company may be necessary to achieve the purposes specified in this Privacy Policy, or may be optional.

If you refuse to provide mandatory data, it will be impossible to achieve the main purpose for which the data is collected and may, for example, make it impossible for the Company to provide community services or other services available on its Sites. The provision of additional data is optional and has no consequences in relation to the main purposes of data collection, since their provision serves exclusively to optimize the quality of services provided.

4. What Personal Data Do We Collect From You?

We take care to collect only the absolutely necessary Personal Data that is appropriate and explicit for its intended purpose. This data includes the following:

- Data that you provide when registering and creating a user account on the HERA Platform: specifically your email address (e-mail), password/login password, name, surname, postal address, and telephone number.
 - Data on the options, learning modules, and services that you prefer to choose most often, in order to recommend content of your interest and to improve your experience. You always have the option not to share such information with us.
 - Data you provide when subscribing to our platform or any informative material.
 - Traffic data of our website.
 - Information collected from the use of cookies in your browser.
 - Technical information about your internet connection and browser, the country and phone code where your device is located, the web pages that appear during your visit, the content you interact with, and any search terms you enter.
 - Your social media username if you interact with us through these channels, to help us respond to your comments, questions, or feedback.
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5. How Do We Use Your Personal Data?

5.1 To Complete Service Selections

AINIGMA Technologies processes your data to fulfil its contractual relationship, process your choice of services, provide customer service, comply with legal obligations, and object to, raise, or exercise legal claims. Please note that it may be necessary to transfer your data to third parties in order to service and process your preferred service.

5.2 To Create a User Account

AINIGMA Technologies processes your data in order to provide you with account functions and to facilitate the provision of community and learning services within the HERA Platform.

5.3 For Contact

AINIGMA Technologies uses your data to respond to your requests, queries, and/or any complaints. We may also keep a record of your queries to help us better respond to any future communication.

5.4 For Web Push Notifications

With your consent, the HERA Platform may send you push notifications about new learning content, community events, and updates. You have the possibility to withdraw this consent at any time from your browser settings.

5.5 For Participation in a Loyalty or Rewards Programme

AINIGMA Technologies may process your data for the purposes of your participation in a loyalty or rewards programme within the HERA community, including the processing of your participation application, the accumulation and redemption of points, and the enjoyment of member benefits. This enables us to offer you personalised offers and content of interest to you.

5.6 To Develop and Improve Our Services

We use your data to develop and improve the content, offers, functionality, and services we provide through the HERA Platform, based on our legitimate business interests and our desire to offer you proposals that are more relevant to your interests and needs.

5.7 To Send Survey and Evaluation Requests

We may send you survey requests in order to improve our services. These messages will not include advertising content. We have a legitimate interest in doing so as this helps our services to be more relevant to you. You are free to opt out at any time by updating your preferences in your online account.

5.8 To Protect Your Account from Fraud and Other Illegal Activities

This includes using your data to maintain, update, and protect your account. We also monitor browsing activity to identify and quickly resolve any problems and protect the integrity of our platform. For example, we check your password when you log in and use automated tracking to detect possible false logins from unexpected locations.

5.9 To Prevent Fraudulent Transactions

We do this based on our legitimate business interests. This also helps to protect our members from fraud and cybercrime incidents in general.

5.10 To Comply with Legal and Contractual Obligations

To comply with our contractual obligations to you, or pursuant to statutory provisions or in execution of court orders. To send you communications required by law or necessary to inform you about changes to the services we provide, including updates to this Privacy Policy.

6. What Is the Legal Basis for the Processing of Your Data?

Data protection legislation defines various reasons for which a company may collect and process your personal data, including:

- The terms of our contractual relationship.
- Your consent, where required. When collecting your personal data, we will always inform you which data is necessary in relation to a specific service.
- The legitimate interest of our Company. In specific cases, we collect your data in a manner that is reasonably expected as part of our business operations and that does not substantially affect your rights, freedom, or interests.

7. Who Are the Recipients of Your Data?

Access to your data is granted to the absolutely necessary personnel of the Company, which is committed to maintaining confidentiality, and to the businesses collaborating with us or third-party service providers, who process your data as Processors on our behalf and according to our instructions.

8. How Is Your Data Shared?

The Company shares your data with:

- Third-party service providers who process personal data on behalf of the Company — for example (including but not limited to) for payment processing, hosting, management and maintenance of our data, research and analysis, management of promotional activities, as well as the management of certain services and elements. When we use third-party service providers, we enter into agreements that require them to implement appropriate technical and organizational measures to protect your personal data.
- Other third parties, to the extent required for: (i) compliance with a request from a Greek State authority, court order, or applicable law; (ii) prevention of illegal use of our Websites and Apps or violations of our Terms of Use; (iii) our protection against third-party claims; and (iv) contributing to the prevention or investigation of fraud cases.
- Other third parties to whom you have given your explicit consent.

8.1 Policy Applied with Third-Party Data Processors

Third-party Processors acting on our behalf have agreed and contractually committed to the Company to:

- Use your data only for the exact purposes we define in our contract with them.
- Work closely with us to ensure that your privacy is respected and protected at all times.
- Maintain confidentiality and not send your data to third parties without the Company's permission.
- Take appropriate security measures.
- Comply with the legal framework for the protection of personal data, particularly Regulation 2016/679/EU (GDPR).

★ **Erasmus+ / EU Obligation:** Erasmus+ Consortium Data Sharing: Where HERA operates within a multi-beneficiary Erasmus+ consortium, a formal consortium agreement governs the transfer of participant data between partners.

9. How Long Do We Keep Your Data?

We keep your Personal Data as long as necessary to fulfil the purposes outlined in this Privacy Policy).

9.1 Examples of Member Data Retention Periods

Data Category	Retention Period
Service Data	5 years from last service use, to comply with legal and contractual obligations.
Newsletter Consent	Duration of newsletter subscription and up to 6 months after cessation.
★ Erasmus+ Participant Data	Minimum 5 years after the end of the project's last grant agreement, or longer if required by the EU Grant Agreement or applicable EU law (EC audit and control rights persist for this period).

10. Are Your Data Secure?

We are committed to safeguarding your Personal Data. Recognizing the importance of the security of your Personal Data, we have taken all appropriate organizational and technical measures to ensure the security and protection of your data from any form of accidental or unlawful processing. We use the most modern and advanced methods to ensure the highest possible security.

Our platform uses the most modern and secure protocols to ensure the safety of online transactions. All data you provide is encrypted so that it cannot be decrypted or altered during transmission over the Internet.

The information used to identify you as an account user consists of two elements: the Username and the Password. Each time you enter your details, you are granted access to your personal account. This process is securely achieved through encryption during transfer over the internet and the Company's servers. The only person who knows your password is you, and you are solely responsible for maintaining the confidentiality of your password from third parties.

These measures are reviewed and modified when deemed necessary.

11. What Are Your Rights?

Under applicable EU data protection, you have the following rights regarding your personal data:

11.1 Right to Access Your Personal Data

You have the right to be informed by us if we are processing your data. If we are processing your data, you can request to be informed about the purpose of the processing, the type of your data that we hold, to whom we give it, how long we store it, whether automated decision-making takes place, as well as your other rights such as correction, deletion, restriction of processing, and filing a complaint with the Data Protection Authority.

11.2 Right to Correct Inaccurate Personal Data

If you find that there is an error in your data, you can submit a request for us to correct it (e.g., correction of name or updating a change of address).

11.3 Right to Deletion / Right to Be Forgotten

You can request us to delete your data if it is no longer necessary for the aforementioned purposes of processing or if you wish to withdraw your consent in the case that it is the only legal basis. Please note that this right may be limited where retention is required by EU grant obligations.

11.4 Right to Data Portability

You can request to receive your provided data in a readable format.

11.5 Right to Restrict Processing

You can request us to restrict the processing of your data for as long as your objections regarding the processing are pending examination.

11.6 Right to Object and Withdraw Consent

You can object to the processing of your data, and we will stop processing your data if there are no other compelling and legitimate reasons that override your right.

If you have given your consent for the collection, processing, and use of your personal data, you can withdraw your consent at any time with future effect by:

- Contacting us using the contact details provided in the relevant section below.
- In the event that we rely on our legitimate interest, you can request that we stop for reasons related to your personal situation.

12. How Can You Exercise Your Rights?

To exercise your rights, you can submit a relevant request to our email address with the subject 'Exercise of Right' and we will review it and respond to you as soon as possible.

By exception:

- If you wish to correct your data in your user account, you can log in and make any correction/change without the need to submit a formal request.
- If you wish to stop receiving web push notifications from the HERA Platform, you can disable the option from your browser settings.

12.1 Identity Verification

To protect the confidentiality of your information, we will ask you to verify your identity before proceeding with any request you submit based on this Privacy Policy. If you have authorized a third party to submit a request on your behalf, we will ask them to prove that they have your permission to act for this purpose.

13. When Do We Respond to Your Requests?

We respond to your requests free of charge without delay, and in any case within one (1) month from the time we receive your request. However, if your request is complex or there is a large number of requests, we will inform you within the month if we need to take an extension of a further two (2) months within which we will respond to you.

14. How Will You Be Informed of Any Changes to This Policy?

We update this Privacy Policy whenever necessary. If there are significant changes to the Privacy Policy or the way we use your Personal Data, we will publish the update on the HERA Platform website before the changes take effect and will notify you in any appropriate manner.

We encourage you to read this Policy periodically to know how your data is protected. This Privacy Policy was last modified on 31/05/2026.