

PRIVACY NOTICE



ELEPHANT TAG RESEARCH GROUP
RESEARCH PROPOSAL
2026.

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Introduction

The purpose of this Privacy Notice (hereinafter referred to as the “**Privacy Notice**”) is to set out, in accordance with the applicable legislation, in particular, but not limited to, the GDPR and the Hungarian Privacy Act, the principal rules governing the processing of data collected through the website <https://ele-tag-research.welfareapp.eu/> (hereinafter referred to as the “**Website**”), which are provided or otherwise used in connection with applications for TAG endorsement conducted by the EAZA Elephant TAG Research Group operating under the auspices of the European Association of Zoos and Aquariums (registered office: Plantage Middenlaan 45, 1018 DC Amsterdam, the Netherlands; abbreviated as “EAZA”) (hereinafter referred to as the “**Research Organiser**”).

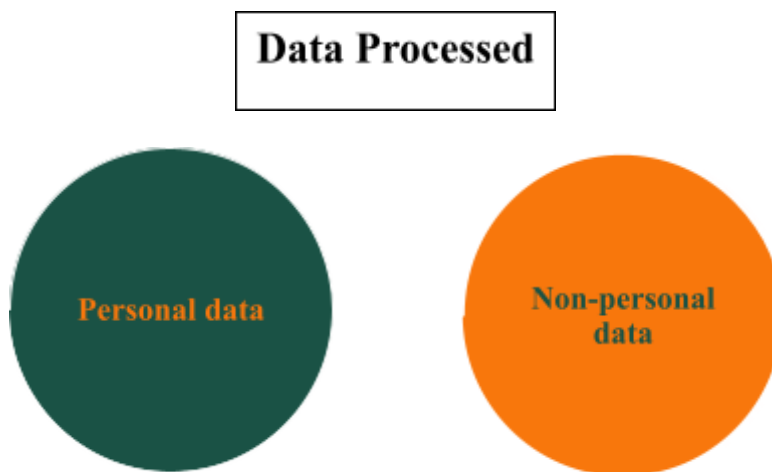
A further key purpose of this Privacy Notice is to provide Data Subjects, in accordance with the applicable legal requirements, with concise, transparent, intelligible, clear and easily accessible information concerning the processing of Personal Data.

1. Definitions – What does each term mean?

a) Categories of data processed by the Controller:

a/1) *Personal Data*: any information relating to a Data Subject.

a/2) *Non-Personal Data*: any data that does not constitute Personal Data.



b) Persons involved in processing by the Controller:

b/1) Controller: the natural or legal person, or an organisation without legal personality, which, alone or jointly with others, determines the purposes of Processing, makes and implements decisions concerning Processing (including the means used for Processing), or has such decisions implemented by a Processor.

Explanation: For the purposes of this Privacy Notice, the Controller is primarily the Research Organiser. A person employed by, or otherwise engaged under another legal relationship for the performance of work (e.g. under a service agreement) by, the Research Organiser may also qualify as a Controller.

b/2) Submitting Party: a person who submits a Research Proposal through the Website, makes an enquiry in connection with a Research Proposal, or otherwise uses the Website for information purposes.

The Submitting Party may be either a Data Subject or a Person Concerned in Relation to Non-Personal Data.

Explanation: If you submit a Research Proposal through the Website, either on your own behalf or on behalf of another person, make an enquiry in connection with a Research Proposal, or otherwise use the Website for information purposes, you qualify as a Submitting Party.

b/3) Researcher: a natural person, legal person or organisation without legal personality referred to as a researcher in a Research Proposal and whose data are provided in the submitted Research Proposal.

Explanation: If you are identified as a Researcher in the submitted Research Proposal and your data are provided in that capacity, you qualify as a Researcher.

b/4) Data Subject: an identified or identifiable natural person to whom any information relates. For the purposes of this Privacy Notice, a Data Subject shall mean a natural person in respect of whom Personal Data or Special Categories of Personal Data are provided to the Controller by the Submitting Party.

Data Subjects may include Submitting Parties, Researchers and other persons.

Explanation:

You are a Data Subject if:

- you are a Submitting Party, Researcher or other person and you provide the Controller with information relating to you on the basis of which you can be identified;
- another Submitting Party provides such information relating to you to the Controller.

b/5) Person Concerned in Relation to Non-Personal Data: a natural person, legal person or organisation without legal personality to whom the Non-Personal Data relate or with whom such data may be associated. Persons Concerned in Relation to Non-Personal Data may include Submitting Parties, Researchers and other persons.

Explanation:

You are a Person Concerned in Relation to Non-Personal Data if:

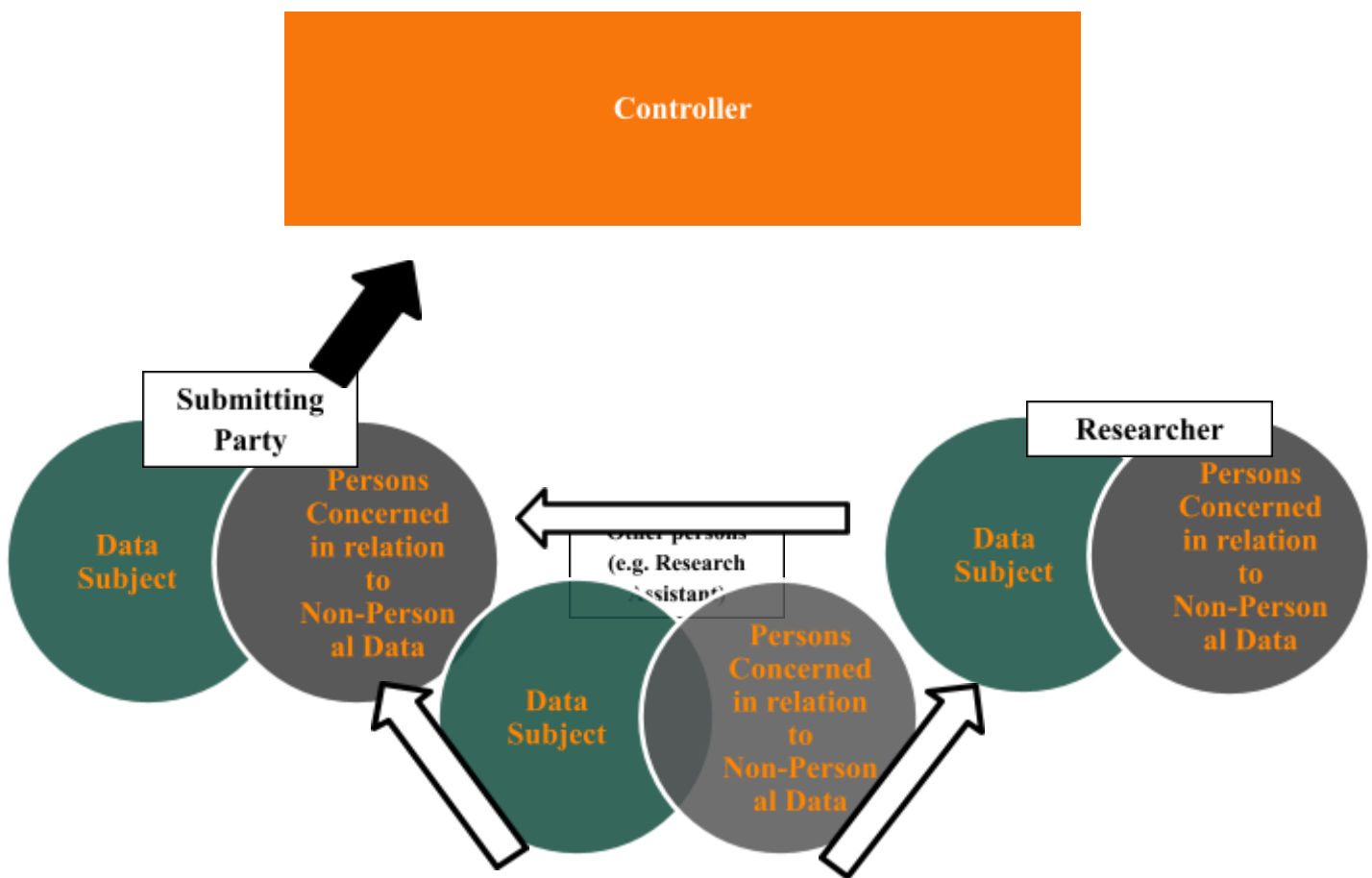
- you are a Submitting Party, Researcher or other person and you provide the Controller with information relating to you on the basis of which you cannot be identified;
- another Submitting Party provides such information relating to you to the Controller.

In addition to the above, a legal person or an organisation without legal personality represented by you may also qualify as a Person Concerned in Relation to Non-Personal Data if:

- you; or
- another Submitting Party

provides the Controller with data relating to that legal person or organisation.

Before you continue reading, please check which group you belong to. Please note that you may belong to more than one group at the same time. The arrows indicate the flow of data.



c) Activities related to Processing by the Controller:

c/1) Processing by a Processor: the performance of technical tasks related to Processing operations, irrespective of the method and means used to carry out such operations and the place where they are performed, provided that the technical task is performed on the data.

Explanation: In practice, Processing by a Processor takes place when the Controller engages an external company, person or other party to perform a technical operation on the data processed by the Controller. Such operations may include, for example, organising or grouping data or transferring them into a standardised database.

c/2) Processing: any operation or set of operations performed on data, irrespective of the procedure used, including, but not limited to, the collection, recording, organisation, storage, alteration, use, retrieval, transmission, disclosure, alignment or combination, restriction, erasure and destruction of data, as well as the prevention of any further use of such data.

Explanation: For the purposes of this Privacy Notice, any activity performed by the Controller on data provided to it constitutes Processing.

c/3) Consent: any freely given, specific, informed and unambiguous indication of the wishes of the Data Subject or the Person Concerned in Relation to Non-Personal Data by which they, by a statement or by other clear affirmative action, signify their agreement to the Processing of Personal Data or Non-Personal Data relating to them.

For the purposes of this Privacy Notice, Consent shall also include a declaration by the Submitting Party or Researcher stating that the Personal Data and Non-Personal Data provided by them to the Controller have been provided in accordance with the applicable legal requirements and assuring the Controller that such data may be lawfully processed by the Controller without any further action being required, even where such data do not relate to the Submitting Party or Researcher concerned.

Explanation:

Consent includes a declaration:

- by which you consent to the Processing of your Personal Data and Non-Personal Data provided to the Controller;
- by which you declare that Personal Data and Non-Personal Data provided by you to the Controller but relating to another person have been provided lawfully and, where applicable, with the consent of the Data Subject.

By making this declaration, you also assure the Controller that it may process such data with the consent of the Data Subject and that no further action is required on its part.

c/4) Destruction of Data: the complete physical destruction of the data carrier containing the data.

Explanation: Destruction of Data includes, for example, the physical destruction of a USB drive or paper documents containing the data.

c/5) Erasure: rendering data unrecognisable in such a way that they can no longer be restored.

Explanation: Erasure includes, for example, deleting data from a USB drive in such a way that they can no longer be recovered.

d) Other terms related to Processing by the Controller:

d/1) Data File: the entirety of data processed in a single filing system.

d/2) Submission: the process carried out through the Website, consisting of the provision of data and the making of declarations, as a result of which a Research Proposal is submitted for the purpose of obtaining TAG endorsement.

d/3) TAG Endorsement: a positive decision made in respect of a Research Proposal submitted through the Website as part of the TAG Review Process, as a result of which the research described in the Research Proposal may receive professional endorsement from the TAG.

d/4) TAG Review Process: the process through which a decision is made as to whether a submitted Research Proposal may receive TAG endorsement.

2. Legislation Applicable to Processing – What laws govern Processing by the Controller?

2.1. The Controller has prepared this Privacy Notice in accordance with, in particular, but not limited to, the following legislation:

- *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the Processing of Personal Data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the “GDPR”);*
- *the Fundamental Law of Hungary;*
- *Act V of 2013 on the Civil Code (hereinafter referred to as the “Civil Code”);*
- *Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as the “Hungarian Privacy Act”).*

3. Purpose of Processing – Why does the Controller process data?

3.1. The purposes of Processing are:

- recording technical and session data necessary for the operation of the Website;
- providing information requested by the Submitting Party;
- identifying the Submitting Party and/or Researcher as necessary for the submission of a Research Proposal and the TAG Review Process conducted for the purpose of granting TAG Endorsement;
- collecting and processing the data, information and documents necessary for the TAG Review Process and using them in the course of the TAG Review Process;
- documenting the TAG Review Process;
- granting TAG Endorsement;
- monitoring the progress of the research;
- facilitating, where appropriate, contact between Researchers, subject to consent to the sharing of data;
- complying with legal obligations applicable to the Controller.

4. Categories of Data Processed – What data does the Controller process?

4.1. In the case of Submitting Parties:

4.1.1. When certain parts of the Website are loaded, cookies are placed on the Submitting Party’s computer. Cookies are small text files stored by the computer and/or browser containing information about the Submitting Party’s session activity on the Website and other technical information, and may enable the identification of the Submitting Party’s computer (hereinafter referred to as “Activity Data”). Submitting Parties are provided with separate information on the use of cookies when using the Website, on the basis of which they may consent to the use of cookies. The placement of cookies is necessary for the operation of certain functions of the Website. Cookies do not cause any damage to the Submitting Party’s computer and do not contain viruses.

Activity Data are stored in a closed system protected by IT security measures, to which only

the Controller and the other persons specified in Section 8.1 have access. The Controller expressly undertakes to use Activity Data solely for the purposes of maintaining the session and ensuring the secure operation of the Website.

Explanation: The Controller uses cookies in connection with the operation of the Website. Cookies are small text files that the Website places on your computer with your consent (they do not cause any problems or damage). This enables the Website to monitor your session and certain technical information necessary for its operation. It is important to note that the Controller uses these data solely to maintain the session and ensure the secure operation of the Website.

4.1.2. The Submitting Party may make enquiries concerning the submission of a Research Proposal in person, by telephone or by email.

a) Enquiries made in person or by telephone:

If the Controller is able to provide the requested information during the enquiry, no data will be recorded in the Controller's system and no Processing will take place.

If the Controller is unable to provide the requested information during the enquiry and the Submitting Party wishes to return in person to obtain the information, the following data must be provided:

- name;
- other data relating to the enquiry (e.g. the professional requirement concerned by the enquiry).
-

If the Controller is unable to provide the requested information during the enquiry and the Submitting Party requests a return telephone call or a response by email, the following data must be provided:

- name;
- telephone number and/or email address;
- other data relating to the enquiry (e.g. the professional requirement concerned by the enquiry).

b) Enquiries made by email

If the Submitting Party wishes to visit the Controller in person to obtain the information, the following data must be provided:

- name;
- other data relating to the enquiry (e.g. the professional requirement concerned by the enquiry).

If the Submitting Party requests a return telephone call in connection with the enquiry, the following data must be provided:

- name;
- telephone number;
- other data relating to the enquiry (e.g. the professional requirement concerned by the enquiry).

If the Submitting Party requests a response by email in connection with the enquiry, the following data must be provided:

- name;
- email address (if the Submitting Party requests a response through the same channel used to contact the Controller, the email address does not need to be provided separately);
- other data relating to the enquiry (e.g. the professional requirement concerned by the enquiry).

4.1.3. Research Proposals may be submitted through the Website.

The following data must or may be provided when submitting a Research Proposal:

- email address;
- project title;
- brief project summary;
- proposed start and end dates;
- the data relating to the participating Researcher(s) specified below;
- background/introduction;
- research aims and objectives;
- methodology;
- research design;
- project deliverables and outputs;
- summary of what is needed from EAZA institutions;
- information on what is intended to be given back to the participating institutions once the project has been completed;
- a declaration as to whether the animals or their environment will need to be manipulated for research purposes during the course of the study;
- a declaration as to whether the project will be submitted, or has already been submitted, to the competent ethical review committee for approval. If so, the approval document must be attached where approval has already been obtained or, where the application is pending, information must be provided on the current status of the application;
- cited references;
- supporting documents and any notes relating to them.

4.2. In the case of Researchers:

The following data relating to the Researcher(s) must or may be provided when submitting a Research Proposal:

- participating Researcher(s):
 - name;
 - organisation;
 - role(s) in the study;
 - contribution of the project to an academic qualification;
 - address;
 - email address;
 - telephone number.

5. Legal Basis for Processing – On what legal basis does the Controller process data?

5.1. In the case of Personal Data: The Controller's Processing of Personal Data is based on the consent of the Data Subject. The Data Subject may withdraw their consent at any time.

The Processing of certain Personal Data is also based on the fact that the Processing is necessary for the performance of obligations arising from a contractual relationship to which the Data Subject is a party, or in order to take steps at the request of the Data Subject prior to entering into such a contractual relationship.

In addition to the above, the Processing of certain Personal Data may also be required by law.

Explanation:

The Controller may process Personal Data relating to you because:

- you, as the Data Subject, have consented to the Processing. You may withdraw your consent at any time;
- the data are necessary in order to take steps requested by you prior to entering into a contractual relationship between you and the Controller;
- the data are necessary for the performance of obligations arising from a contractual relationship between you and the Controller;
- the Processing is required or permitted by law.

5.2. In the case of Non-Personal Data: Processing is based on a declaration made by the Submitting Party or Researcher stating that the data provided may be lawfully processed by the Controller.

Explanation: The Controller may process Non-Personal Data because you, as a Submitting Party or Researcher, have declared that the Controller may lawfully process such data, i.e. that the data do not constitute, for example, a trade secret, protected know-how or other protected information.

6. Processing Procedures – How and for how long does the Controller process data?

6.1. Processing of data collected in relation to Submitting Parties

6.1.1. Processing of data recorded by cookies

Activity Data recorded by cookies are stored in the Controller's closed system protected by IT security measures, to which only the persons specified in Section 8.1 have access.

The Controller processes these data until the purpose of the Processing has been fulfilled and reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Explanation: If the cookies used on the Website have recorded Activity Data, the Controller stores such data in a system protected by IT security measures. The Controller processes the data for as long as necessary to maintain the session and ensure the secure operation of the Website. The Controller reviews the necessity of the Processing every three years.

6.1.2. Processing of data provided in the course of an enquiry

Submitting Parties may make enquiries concerning the submission of a Research Proposal in person, by telephone or by email.

If the Controller is able to provide an immediate response to an enquiry made in person or by telephone, no Processing will take place.

If the Controller is unable to provide an immediate response, or if the Submitting Party makes an enquiry by email, the legal basis for the Processing is that the Processing is necessary in order to take steps at the request of the Submitting Party prior to entering into a contractual relationship. Such data are processed until the purpose of the Processing has been fulfilled, and the Controller reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Once the data provided in the course of the enquiry have been transferred to the Controller, they are recorded in the Controller's closed system protected by IT security measures, to which only the persons specified in Section 8.1 have access.

Explanation: You may make an enquiry concerning the submission of a Research Proposal in three ways: in person, by telephone or by email.

If the Controller is unable to provide you with an immediate response in person or by telephone, it may process the data you provide because those data are necessary in order to provide the information you have requested. The same applies to enquiries made by email. The Controller processes the data for as long as necessary to provide the requested information. The Controller reviews the necessity of the Processing every three years.

The Controller stores electronically recorded data in a system protected by IT security measures until the purpose of the Processing has been fulfilled.

6.1.3. Processing of data provided when submitting a Research Proposal

When submitting a Research Proposal, the Submitting Party must provide the data specified above.

The data provided are recorded in the Controller's closed system protected by IT security measures, to which only the persons specified in Section 8.1 have access.

Where the Processing is based solely on consent, the Controller processes these data until the purpose of the Processing has been fulfilled and reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Where the Processing is based solely on the necessity of Processing for the performance of obligations arising from a contractual relationship between the parties, the Controller processes the data until the purpose of the Processing has been fulfilled and reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Where the Controller processes the data on the basis of a legal requirement, the data are retained and processed for the period prescribed by the applicable legislation.

Explanation: In order to submit a Research Proposal, the Submitting Party must provide the data specified above. The Controller stores electronically recorded data in a system protected by IT security measures until the purpose of the Processing has been fulfilled. The Controller reviews the necessity of retaining the data every three years.

However, where the Processing of your data is also required by law, the Controller processes those data for as long as required by the applicable legislation.

When submitting a Research Proposal, the Submitting Party must provide the data relating to Researchers specified above.

The data provided are recorded in the Controller's closed system protected by IT security measures, to which only the persons specified in Section 8.1 have access.

Where the Processing is based solely on consent, the Controller processes these data until the purpose of the Processing has been fulfilled and reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Where the Processing is based solely on the necessity of Processing for the performance of obligations arising from a contractual relationship between the parties, the Controller processes the data until the purpose of the Processing has been fulfilled and reviews the necessity of the Processing in a documented manner at least once every three years. The Controller retains the documentation prepared as part of such review for 10 years.

Where the Controller processes the data on the basis of a legal requirement, the data are retained and processed for the period prescribed by the applicable legislation.

Explanation: In order to submit a Research Proposal, the Submitting Party must provide the data relating to Researchers specified above. The Controller stores electronically recorded data in a system protected by IT security measures until the purpose of the Processing has been fulfilled. The Controller reviews the necessity of retaining the data every three years.

However, where the Processing of your data is also required by law, the Controller processes those data for as long as required by the applicable legislation.

7. Data Security – How does the Controller protect the data it processes?

7.1. The Controller stores the electronic data specified in Section 4 in a closed system protected by IT security measures and processes such data using secure, closed software systems protected by appropriate IT security measures.

The Controller undertakes to take all necessary and reasonable measures to protect the data it processes, both during network communications and during the storage and retention of such data, against unauthorised access, alteration, transmission, disclosure, erasure or destruction, as well as against accidental loss, destruction or damage and against becoming inaccessible as a result of changes in the technology used.

Explanation: The Controller stores the electronic data in its possession in a system protected by IT security measures and uses only software protected by appropriate IT security measures when Processing such data. The Controller protects the data against unauthorised access or disclosure, alteration, loss of availability and destruction.

8. Controllers, Processors and Other Service Providers – Who processes the data provided to the Controller, and what other persons or organisations may you come into contact with?

8.1. Controller: Only the Research Organiser and persons employed by, or otherwise engaged under another legal relationship for the performance of work by, the Research Organiser (hereinafter collectively referred to as the “Controller”) are authorised to process the data specified in Section 4 or access the stored data. The Controller processes the data solely for specified purposes and does not use the data for any purpose other than those specified in Section 3.

Explanation: The data provided to the Research Organiser may only be processed by persons working for the Research Organiser. In the course of Processing, they may only act in accordance with the purposes of Processing.

8.2. Processor: The Controller engages Processors for the purpose of performing certain obligations and carrying out its activities.

8.2.1. The Controller stores the data provided or obtained through the Website on storage space provided by the following hosting service provider (hereinafter referred to as the “Hosting Service Provider”):

Name: RACKFOREST ZRT.

Contact person: the person authorised to represent the company according to the data recorded in the company register.

Address: 1132 Budapest, Victor Hugo utca 11, 5th floor, B05001, Hungary

In relation to the data provided to the Controller, the Hosting Service Provider solely provides data storage services and does not perform any other Processing operations.

The Hosting Service Provider provides the storage space necessary for storing the data for as long as required for the performance of its contract with the Controller.

Explanation: The Hosting Service Provider specified above provides storage space to the Controller. The Hosting Service Provider cannot view the data stored on the server and cannot perform any other Processing operations on such data. The data remain stored for as long as required under the contract between the Hosting Service Provider and the Controller.

8.3. For the purpose of sending the confirmation email addressed to the Submitting Party regarding the submission of the Research Proposal and the notification email addressed to the persons participating in the TAG Review Process (in both cases containing a PDF version of the Research Proposal), the Controller uses the email system and server of the following service provider.

We specifically draw your attention to the fact that Processing carried out by this service provider **may also take place outside the European Union and the European Economic Area (EEA).** Submitting Parties, Researchers and other Data Subjects may obtain further information about the Processing activities carried out by the service provider on the service provider’s website.

Service provider and server: Google Cloud EMEA Limited (70 Sir John Rogerson’s Quay, Dublin 2, Ireland) or Google Ireland Limited (Gordon House, Barrow Street, Dublin 4, Ireland), Gmail SMTP server

Contact person: the person authorised to represent the relevant company according to the applicable official register

We also specifically draw your attention to the fact that **where a Researcher, research institution, university or other contributor participating in the research project is located in a third country outside the EEA, the Controller may transfer data to the relevant third country.** Such transfers will only take place where the requirements set out in Chapter V of the GDPR are met.

Explanation: In order for the Controller to send you a confirmation email regarding the submission and to inform the persons participating in the TAG Review Process about your Research Proposal, the Controller uses the services of the service provider specified above. Further information on the Processing activities carried out by this service provider is available on the service provider’s website. We specifically draw your attention to the fact that Processing carried out by this service provider may also take place outside the European Union and the EEA.

9. Rights of Data Subjects and Persons Concerned in Relation to Non-Personal Data – What rights do you have in connection with Processing carried out by the Controller and the Processor?

9.1. *Right of Access:* The persons and organisations referred to above may at any time request that the Controller provide them with the data relating to them and information concerning the Processing of such data.

Explanation: You may at any time request information about the data relating to you that are processed by the Controller. You may also request information about the source of the data, the purpose and legal basis of the Processing, the period for which the data are processed, the name and address of the Processor, and the Processor's activities in connection with the Processing.

9.2. *Right to Rectification:* The persons and organisations referred to above may at any time request that the Controller rectify or complete the data relating to them.

Explanation: If any data relating to you are inaccurate or incomplete, you may request that the Controller correct or complete them.

9.3. *Right to Restriction, Erasure and Destruction:* The persons and organisations referred to above may at any time request the restriction of Processing of data relating to them, or the erasure or destruction of such data (except for data subject to mandatory Processing).

Explanation: You may at any time request the restriction of Processing of data relating to you, or the erasure or destruction of such data.

9.4. The Controller shall comply with the requests referred to above as soon as possible, but no later than 25 days after receipt of the request, or shall inform the persons or organisations concerned of the refusal of the request, the reasons for such refusal and the available legal remedies.

Explanation: You will receive a response to your request no later than 25 days after it is received. If the Controller refuses your request, it will provide the reasons for the refusal and inform you of the legal remedies available to you.

9.5. In the event of an infringement of their rights referred to above, Data Subjects may lodge a complaint with or bring proceedings before:

- Hungarian National Authority for Data Protection and Freedom of Information (1055 Budapest, Falk Miksa utca 9–11, Hungary);

- the competent court according to their place of residence or habitual residence.

Explanation: If your rights relating to your Personal Data are infringed, you may seek legal remedy before the authorities or courts specified above.

9.6. A Person Concerned in Relation to Non-Personal Data and the Controller shall primarily seek to resolve any dispute arising between them in connection with Processing by amicable settlement. If no settlement can be reached, the Person Concerned in Relation to Non-Personal Data may bring proceedings before the competent court in accordance with the general rules laid down in the legislation governing civil procedure.

Explanation: If your rights relating to Non-Personal Data associated with you are infringed, you may seek to resolve the matter by amicable settlement or through court proceedings.

10. Miscellaneous and Final Provisions

10.1. The Controller is entitled to amend this Privacy Notice unilaterally, subject to prior notification of the Submitting Parties and Researchers. In the event of a material amendment to this Privacy Notice, the Controller shall, where necessary to ensure the lawfulness of the Processing, obtain consent again. The Controller makes this Privacy Notice available on the Website.

Explanation: You may view this Privacy Notice on the Website at any time. The Controller may amend this Privacy Notice unilaterally. To ensure that new provisions do not apply to you without your knowledge, the Controller will inform you of any amendment in advance and, where necessary, obtain your consent to the Processing again.

10.2. The Submitting Party or Researcher may not provide the Controller with any data that infringe the rights or legitimate interests of a third party or the Controller.

Explanation: You may only provide the Controller with data that do not infringe the rights of the Controller or any other person.

10.3. If the Submitting Party or Researcher has provided the data of a third party without authorisation, the Controller shall be entitled to treat the declaration made by the Submitting Party or Researcher as invalid and to delete the submitted Research Proposal and/or the data provided.

10.4. This Privacy Notice consists of 15 numbered pages and has been adopted by the Research Organiser as the fundamental document governing Processing in connection with the Website and the submission of Research Proposals.