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Funded by
the European Union

1 Information Sheet

1.1. About the Project

The Advanced Validation and Testing Environment for Enhancing the EU HW and SW Vulnerabilities Assessment and Security based on Innovative AI Services (hereinafter, "**ATHENA**" or "**the Project**") is a 36-month, EU-funded project under the Horizon Europe programme.

The project's main objective is to enhance hardware and software vulnerability assessment capabilities across Europe by developing an advanced validation and testing environment powered by innovative artificial intelligence services.

ATHENA brings together a multidisciplinary consortium of 12 partners from across Europe, including universities, research centres, public bodies, tech SMEs, and industrial and port stakeholders. The collaboration aims to build a comprehensive environment that integrates threat detection, automated testing, cyber-intelligence, and compliance, all within a secure and ethically aligned framework.

The outcomes of the Project are expected to contribute to Europe's strategic autonomy in cybersecurity, providing new capabilities to defend against advanced cyber threats across both civil and industrial domains.

Among the project partners, we at ETRA are responsible for managing the Stakeholder Network of the project.

As part of these responsibilities, we have prepared an online form in order to engage new stakeholders to the network of ATHENA, and we would be grateful for your participation.

Please take whatever time you need to read and understand the following text. The decision to join, or not to join, is up to you.

1.2. Voluntary Participation

Your participation is entirely voluntary and free of charge, as well as your consent to participate in the ATHENA Stakeholder Network as described above. It is your choice to participate or not. You might change your mind later and stop participating even if you agreed earlier, at any time, without any negative consequence.

1.3. Risks

There are no risks associated with joining the Stakeholder Network beyond normal communication activities.

1.4. Benefits

Your participation is highly appreciated! There will not be a direct benefit for you. By joining the network, you will have the opportunity to stay informed about project developments and contribute to shaping cybersecurity innovation in Europe.

1.5. Reimbursement

You will not receive any incentives to take part in the research.

1.6. Contact information

If you have any questions about the Stakeholder Network (SHN) or the Project itself, the processing of your personal data, or your participation in the related activities, please contact:

Pablo Mendioroz - pmendioroz.etraid@grupoetra.com

2. Privacy Notice

For the purposes described above, ETRA INVESTIGACIÓN Y DESARROLLO S.A. shall be the Data Controller of your personal data. ETRA INVESTIGACIÓN Y DESARROLLO S.A. is committed to taking its responsibility regarding the security and privacy of Personal Data very seriously (as well as the Consortium as a whole) and is going to be transparent about the type of data it collects and how it is being handled.

According to Article 5 of the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the Processing of the Personal Data carried out for the performance of the research activities indicated above for the purposes of the Project will be based on the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity and accountability.

To this extent, please read the following Privacy Notice (hereinafter the "**Privacy Notice**") that explains how your personal data will be processed and protected by the Controller.

Any term indicated in capital letters shall have the meaning attributed to it within the GDPR or otherwise provided hereto. However, if you have any doubts, please feel free to ask for any kind of clarification from the person who is delivering you the present Privacy Notice.

2.2. Contact Details

If You would like to exercise your rights under GDPR, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your Personal Data, please feel free to contact the following email address: pmendioroz.etraid@grupoetra.com. You can also contact our Data Protection Officer by sending a message to dpo@grupoetra.com.

2.3. Data Controller

The Data Controller of your Personal Data will be ETRA INVESTIGACIÓN Y DESARROLLO S.A.

2.4. Personal data processing and lawful basis

The Controller will only process the Personal Data that you will voluntarily and directly decide to provide and/or disclose to the same in connection and/or related to the Stakeholder Network (SHN) activities, such as, your name, surname, email, professional details information and job title.

The lawful basis pursuant to which the Controller will process your Personal Data shall be your freely given and informed consent to the data processing itself, given by you by accepting the Privacy Notice. Please note that you are free to give your consent as well as to deny it (Article 6, paragraph 1, letter a of GDPR). Furthermore, the ETRA INVESTIGACIÓN Y DESARROLLO S.A. may use your Personal Data to comply with its tax and other legal obligations, including in terms of invoicing, accounting and archiving (Article 6, paragraph 1, letter c of GDPR).

2.5. Purpose of the data processing

The Processing of your Personal Data will be limited to the extent necessary to perform each and all the activities connected and related to the Stakeholder Network.

These activities include:

- To manage your registration and membership in the Stakeholder Network.
- To communicate with you regarding the Project activities, events, and updates.
- To send you relevant information, newsletters, and publications about the ATHENA project.
- To involve you in workshops, surveys, and stakeholder activities.

Any other further processing of your Personal Data will be excluded without your prior consent.

2.6. Recipients of Personal Data

Your Personal Data may be accessed, for the purposes referred to above, by:

- Subjects, bodies or authorities to which the Controller is obliged to communicate your Personal Data pursuant to any applicable law;
- Our server provider at ETRA INVESTIGACIÓN Y DESARROLLO S.A. premises.

The Controller may also share your information with the EC or with competent legal and/or fiscal authorities for legitimate reasons.

2.7. Personal Data transfer to third countries

As a general rule, any transfer of your personal data outside the European Economic Space (EEA) will be carried out in full compliance of Chapter V of GDPR (Transfers of personal data to third countries or international organisations), moreover if any processing activities involving the transfer outside the EEA of your personal data should occur (i) you will be notified before the transfer and (ii) you will have the right to object to such transfer at any time. At the moment, the Data Controller does not provide for the transfer of data to third countries. However, this aspect will be subject to continuous monitoring and updating.

Without prejudice to the above, as a general rule, your personal data will be stored and processed within the EEA.

2.8. Data Retention and Data Security

The personal Data processed for the purposes set out in the section “Purposes of the data processing” will be kept for the time strictly necessary to achieve the purposes stated therein. The Controller will store your information until the end of the project (October 2028), or the retention period required by law, whichever is longest, and for the applicable statute of limitations period thereafter.

In any case, to ensure the best level of protection of your Personal Data, we will apply all the best physical and logical security measures internally, and our servers are subscribed from the most established cloud providers and protected through state-of-the-art security measures.

2.9. Data subject rights

Pursuant to the GDPR, you have a number of rights concerning the Personal Data we hold about you. If you wish to exercise any of these rights, please contact us using the contact details set out above.

- **The right to be informed.** You have the right to be provided with clear, transparent and easily understandable information about how we use your information and your rights. This is why we are providing you with the information in this Privacy Notice.
- **The right of access.** You have the right to obtain access to your Personal Data, subject matter of the data Processing. This will enable you, for example, to check that we are using your Personal Data in accordance with the relevant data protection law. If you wish to access the information we hold about you in this way, please get in touch (please see section Contact Details above).
- **The right to rectification.** You are entitled to have your Personal Data corrected if it is inaccurate or incomplete. You can request that we rectify any errors in information that we hold by contacting us (please see section Contact Details above).
- **The right to erasure.** This is also known as 'the right to be forgotten' and, in simple terms, enables you to request the deletion or removal of certain of the Personal Data that we hold about you by contacting us (please see section Contact Details above). Please remember that it is possible that, pursuant to any applicable law, you may not have all your personal data erased.
- **The right to restrict processing.** You have the right to 'block' or 'suppress' certain further use of your Personal Data. When processing is restricted, we can still store your Personal Data, but we will not use it further.
- **The right to data portability.** You have the right to obtain your personal information in an accessible and transferrable format so that you can re-use it for your own purposes across different service providers. This is not a general right, however, and there are exceptions. To learn more, please get in touch (please see section Contact Details above).
- **The right to lodge a complaint.** You have the right to lodge a complaint about the way we handle or process your Personal Data with the relevant national Data Protection Authority.
- **The right to withdraw consent.** If you have given your consent to anything we do with your Personal Data, you have the right to withdraw that consent at any time. You can do this by contacting us (please see section Contact Details above). Withdrawing consent will not, however, make unlawful our use of your information while consent had been apparent.
- **The right to object to processing.** You have the right to object to certain types of processing.

2.10. Changes

Where appropriate, we will notify you of any changes to this Privacy Notice by email.

This Privacy Notice was last updated on 08/07/2026.