

# DigLib Privacy Policy

*Last updated: June 27, 2025*

Website: <https://dig-lib.eu>

## 1. INTRODUCTION

This Privacy Policy explains how dig-lib.eu (“we”, “our”, or “us”) collects, uses, and protects your personal data when you visit our website [<https://dig-lib.eu>] in accordance with the General Data Protection Regulation EU regulation 2016/679 (“GDPR”) and other applicable EU and national data protection laws.

This policy applies to all users accessing the site, whether from within or outside the EU.

## 2. DATA CONTROLLER

The data processing activities described in this Privacy Policy of the dig-lib.eu website are carried out under the joint controllership of the partners participating in the “Digital Libraries” project. These partners act as **joint data controllers** within the meaning of Article 26 of the General Data Protection Regulation (GDPR) and are bound by a joint controllership agreement that defines their respective roles and responsibilities in ensuring compliance with data protection obligations.

A summary of the essence of this agreement can be made available upon request.

The joint controllers are:

- **Fundacja Rozwoju Społeczeństwa Informacyjnego (FRSI)**, Kopernika 17,00-359 Warsaw, Poland
- **Dot Beyond s.r.l**, Piazza di Sant’Andrea della Valle, 6 00186, Roma, Italy,
- **Culture Socialità Biblioteche Network Operativo (CSBNO)**, Via Vittorio Veneto 18, 20026 Novate Milanese, Italy
- **Public Libraries 2030 (PL2030)**, Rue Maximilien 16, 1050 Ixelles, Brussels, Belgium
- **Fundatia EOS pentru Educatie Digitala (EOS)**, Strada Treboniu Laurian, nr 5, ap 5, 300200 Timișoara, Romania

For any inquiries or to exercise your data protection rights, you may contact any of the joint controllers, or write to the designated contact point: [diglib-privacy@frsi.org.pl](mailto:diglib-privacy@frsi.org.pl)



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### 3. WHAT DATA DO WE COLLECT?

We may collect the following types of personal and technical data:

- **Technical data:** IP address, device and browser type, browsing activity (collected via cookies and analytics tools)
- **Usage data:** number of visits, page views, document downloads (via Google Analytics); user interactions within the virtual learning environment (e.g., completed modules, participation in forums and chats), where applicable
- **Contact and account information:** name, surname, organization or library (if applicable), and email address—only when voluntarily provided, for example when subscribing to our newsletter, submitting an inquiry, or registering for access to the virtual learning environment
- **Learning activity and feedback data:** optional questionnaires filled out by registered users during their learning journey (e.g., initial skills self-assessment, satisfaction surveys after completing content units or the overall learning path)
- **Social media data:** if you interact with us via social media buttons (e.g., follow/share), we may see your public profile, including profile picture and other public information depending on your privacy settings

### 4. HOW DO WE COLLECT DATA?

We collect personal data through:

- Newsletter subscription forms
- Contact forms or direct email communication
- Optional user registration on the website for accessing the virtual learning environment
- Cookies and tracking technologies (see our [Cookie Policy](#))
- Google Analytics for aggregate statistical purposes
- Social media platforms (if you follow or interact with our profiles through embedded buttons)

### 5. PURPOSE OF DATA PROCESSING

We process your personal data for the following purposes:

- To manage and provide the newsletter subscription service
- To respond to user inquiries and communication requests
- To analyze website usage and improve performance, as well as prevent abuse, security breaches or malicious activity
- To allow optional registration and user access to the virtual learning environment
- To support users' learning experience through personalised interactions, participation in peer-to-peer spaces (e.g., forums, chats), and the collection of structured feedback via educational questionnaires



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- To fulfill reporting obligations related to the EU-funded “Digital Libraries” project (e.g., usage metrics)
- To understand user interaction with our social media content (e.g., through likes, follows, or shares)

## 6. LEGAL BASIS FOR PROCESSING

In compliance with the GDPR, we rely on the following legal bases for processing your personal data:

- **Consent:** for newsletter subscriptions, cookie usage, and voluntary social media interactions (via our cookie banner and opt-in forms)
- **Legitimate interest:** to ensure site functionality, respond to general inquiries, and analyze aggregated usage data
- **Legal obligation:** to respond to the exercise of data subject rights under GDPR, and to fulfill obligations related to EU project funding requirements
- **Contractual or pre-contractual necessity:** where data processing is necessary to take steps at the request of the data subject before entering into a contract (e.g., event registration or service inquiry)

## 7. DATA RETENTION

We retain your data only for as long as necessary to fulfill the purposes outlined above or as required by law. Newsletter subscription data is stored until you withdraw your consent. Data collected for inquiries will be stored for the time needed to respond and maintain a record of communication.

## 8. DATA SHARING & DATA TRANSFER

We may share your data with the following third-party services:

- **Mailchimp**, for newsletter distribution.  
Data stored: email address
- **Google**, for anonymized website analytics (Google Analytics)  
Data collected: IP address, device data  
IP anonymisation is enabled.
- **Social media platforms** (e.g., Facebook, X/Twitter, LinkedIn), when you interact with embedded content or follow us via social buttons
- Trusted third-party service providers, only when necessary for the technical operation or security of the website

Where applicable, these third parties act as independent data controllers.

**For more information on how these services handle personal data, please refer to the privacy policies of the respective third-party platforms.**

Data may be transferred outside the European Economic Area (EEA) only where appropriate safeguards are in place, in accordance with Articles 44–49 of the GDPR.

## 9. YOUR RIGHTS

Under the GDPR, you have the right to:

- Access your data
- Correct inaccurate data
- Erase your data (“right to be forgotten”)
- Restrict or object to the processing of your data
- Withdraw consent at any time (without affecting the lawfulness of processing based on consent before its withdrawal)
- Lodge a complaint with your national Data Protection Authority

To exercise any of these rights, please contact us at: [diglib-privacy@frsi.org.pl](mailto:diglib-privacy@frsi.org.pl)

## 10. CHANGES TO THE PRIVACY POLICY

This document, published at [LINK](#) constitutes the privacy policy of this site. It may be subject to changes or updates. Users are invited to periodically consult this page to keep up to date with the latest legislative news. Changes to this Privacy Policy are effective when they are posted on this page.

## 11. CONTACT

If you have questions about this Privacy Policy, contact us at: [diglib-privacy@frsi.org.pl](mailto:diglib-privacy@frsi.org.pl)



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