Data Protection Policy

COMPTEXT Association Limited

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COMPTEXT CONFERENCE

1. Policy Statement

COMPTEXT Association Limited, incorporated and registered in Ireland ("COMPTEXT" or "the Company"), organises conferences, workshops and other academic events hosted by universities, research institutes and other public venues worldwide. In doing so, COMPTEXT inevitably collects and processes personal data relating to participants, staff, contractors, partners and other stakeholders.

COMPTEXT recognises its responsibility as a data controller to ensure that such personal data is processed lawfully, fairly and transparently, in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR"), the Irish Data Protection Act 2018, and any other applicable legislation in the jurisdictions where events are hosted.

The purpose of this Policy is to set out how COMPTEXT collects, uses, stores, shares and protects personal data, and to inform data subjects of their rights under data protection law.

2. Definitions

For the purposes of this Policy:

Personal Data means any information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, online identifier, or one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person.

Data Subject means the natural person whose Personal Data is processed.

Processing means any operation or set of operations performed on Personal Data, whether or not by automated means, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Controller refers to COMPTEXT Association Limited as the entity which determines the purposes and means of Processing Personal Data.

Processor means any natural or legal person, public authority, agency or other body which processes Personal Data on behalf of the Controller.

Third Party means any natural or legal person, public authority, agency or body other than the Data Subject, the Controller, the Processor, and persons

who, under the direct authority of the Controller or Processor, are authorised to process Personal Data.

Data Users refers to COMPTEXT staff, contractors, volunteers, and other authorised persons who have access to and use Personal Data on behalf of the Company.

Data Protection Laws means all applicable laws relating to the protection of individuals with regard to the processing of personal data, including Regulation (EU) 2016/679 (the General Data Protection Regulation, or "GDPR"), the Data Protection Act 2018 (Ireland), and any relevant guidance or codes of practice issued by the Data Protection Commission or other competent authorities.

Personal Data Breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, Personal Data, whether caused accidentally or deliberately.

Special Category Data means Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, as well as genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, or data concerning a natural person's sex life or sexual orientation.

Criminal Offence Data means Personal Data relating to criminal convictions, offences or related security measures.

Profiling means any form of automated processing of Personal Data consisting of the use of such data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

Automated Decision-Making means a decision based solely on automated processing, without any human involvement, which produces legal effects concerning a Data Subject or similarly significantly affects them.

Data Retention Principles means the standards by which COMPTEXT determines how long Personal Data is retained, ensuring that data is kept only for as long as is necessary for the purposes for which it is processed and in line with applicable legal and regulatory requirements.

3. Principles

COMPTEXT is committed to ensuring that all Personal Data is processed lawfully, fairly, and in a transparent manner in accordance with applicable Data Protection Laws. To this end, the Company adheres to the following principles:

3.1. Lawfulness, Fairness and Transparency

Personal Data shall be processed lawfully, fairly and in a manner that is transparent to the Data Subject.

3.2. Purpose Limitation

Personal Data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner incompatible with those purposes.

3.3. Data Minimisation

Personal Data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.

3.4. Accuracy

Personal Data shall be accurate and, where necessary, kept up to date. Every reasonable step shall be taken to ensure that inaccurate data, having regard to the purposes for which it is processed, is erased or rectified without delay.

3.5. Storage Limitation

Personal Data shall be kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the data is processed, subject to legal and regulatory retention requirements.

3.6. Integrity and Confidentiality

Personal Data shall be processed in a manner that ensures appropriate security, including protection against unauthorised or unlawful processing, accidental loss, destruction or damage, using suitable technical and organisational measures.

3.7. Accountability

COMPTEXT, as Controller, accepts responsibility for demonstrating compliance with these principles and shall maintain appropriate policies, procedures and records to evidence such compliance.

4. Scope of the Policy

This Policy applies to all Personal Data processed by COMPTEXT in connection with its academic, administrative and professional activities. It covers the collection, use, storage, disclosure and protection of Personal Data, regardless of the format (electronic, paper or otherwise) or the means by which it is processed.

The scope includes, but is not limited to, the following areas of COMPTEXT's activities:

- **Event registration and participation** – including conferences, workshops, seminars, training courses, and associated social or networking activities organised under the auspices of COMPTEXT.

- **Membership administration** – including the management of institutional and individual memberships, rights and obligations, elections, and communications with members.

- **Academic and professional communication** – including peer review, research collaborations, funding applications, publication processes, mailing lists and newsletters.

- **Financial transactions** – including payments for event participation, membership subscriptions, grants, and reimbursements.

- **Online platforms and websites** – including the official COMPTEXT website (https://www.comptextconference.org/), online registration systems, virtual event platforms, collaborative tools and digital archives.

- **Social media and digital communications** – including COMPTEXT's official accounts on platforms such as LinkedIn, Bluesky and X (formerly Twitter), where Personal Data may be collected, processed or displayed.

This Policy applies to all categories of Data Subjects, including:

- **Participants** (delegates, speakers, chairs, panellists, observers) attending COMPTEXT events;

- **Staff and volunteers** (COMPTEXT personnel, contractors, student assistants);

- **Members** of COMPTEXT (institutional representatives, individual members, affiliated Standing Groups or networks);

- **Suppliers and partners** (external service providers, publishers, caterers, IT and technical support);

- **Visitors and users** of COMPTEXT's websites, online systems and social media accounts.

This Policy applies during all official COMPTEXT activities, whether onsite at a host venue, online through COMPTEXT-managed platforms, or in hybrid formats. It does not extend to private activities undertaken by participants outside the scope of COMPTEXT's official programme.

5. How We Collect Personal Data

COMPTEXT collects Personal Data from a range of sources in the course of carrying out its academic, administrative and organisational activities. These include:

5.1. Directly from Data Subjects

- When you register for a COMPTEXT event, create an online account, submit a proposal, participate in a workshop or panel, or otherwise interact with COMPTEXT staff or representatives.
- When you communicate with COMPTEXT by email, telephone, online forms, surveys or in person.
- When you provide payment information for membership, event participation or reimbursement.

5.2. Automatically through Digital Platforms

- COMPTEXT's official website (https://www.comptextconference.org/) and associated online services may collect data such as IP addresses, browser type, device identifiers, pages visited, and usage logs.
- Cookies and similar technologies may be used to analyse traffic, improve functionality and enhance user experience. Cookie settings can be managed at the browser level.

Category	Purpose	Examples of Cookies
Essential cookies	Required for the operation of the website and for security purposes, including the prevention of spam and automated abuse.	_GRECAPTCHA, AEC
Analytics cookies	Collect information on how visitors use the website in order to improve functionality and performance.	_ga, _ga_K2LKZPHQSE
Security and account-related cookies	Set by Google services for authentication, fraud prevention, and account security.	__Secure-1PAPISID, __Secure-3PSID, APISID, HSID

5.3. Through Third-Party Systems and Providers

- COMPTEXT may use third-party platforms for event registration, academic submissions, virtual events, and payment processing. Where Personal Data is collected via such platforms, COMPTEXT ensures that appropriate Data Processing Agreements are in place.

- Where an institution hosts a COMPTEXT event, limited Personal Data (e.g., name, institutional affiliation, role) may be shared with the host for organisational or security purposes.

5.4. Photography, Filming and Recordings at Events

- Photography and filming may take place during COMPTEXT events for academic, archival and promotional purposes. Participants will be notified in advance, and where feasible, will be given opportunities to opt out of being photographed or recorded.
- Recordings of plenary sessions, keynote lectures or workshops may be made available via COMPTEXT's website, online repositories or official social media channels (e.g. LinkedIn, Bluesky, X).

5.5. Social Media and Online Interaction

- COMPTEXT maintains official social media accounts (including LinkedIn, Bluesky, and X). Where individuals engage with these accounts by liking, sharing, commenting or posting content, Personal Data may be visible to COMPTEXT and other users of the platform. Each platform is subject to its own privacy policy and COMPTEXT does not accept responsibility for the practices of third-party social media providers.

COMPTEXT does not purchase, sell, or otherwise trade in Personal Data. Any data obtained from third parties is limited to what is necessary for the fulfilment of COMPTEXT's legitimate organisational purposes.

6. Lawful Bases for Processing

COMPTEXT processes Personal Data only where a valid lawful basis exists under applicable Data Protection Laws. Depending on the context, one or more of the following bases may apply:

6.1. Consent

Where Data Subjects have given their explicit, informed, and freely given consent for the processing of their Personal Data (e.g., subscribing to newsletters or joining mailing lists).

6.2. Contractual Necessity

Where the processing is necessary for the performance of a contract 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 a contract (e.g., conference registration, membership agreements).

6.3. Legal Obligation

Where the processing is necessary for compliance with a legal obligation to which COMPTEXT is subject (e.g., financial record-keeping, tax compliance, regulatory reporting).

6.4. Legitimate Interests

Where processing is necessary for the purposes of COMPTEXT's legitimate interests or those of a third party, except where such interests are overridden by the rights and freedoms of the Data Subject (e.g., improving events, protecting the security of IT systems, promoting COMPTEXT's activities).

6.5. Vital Interests

Where processing is necessary in order to protect the vital interests of the Data Subject or another natural person (e.g., in cases of medical emergencies at COMPTEXT events).

6.6. Public Interest

Where processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in COMPTEXT (rare in practice, but may arise in the context of cooperation with public institutions).

7. Special Category Data and Criminal Offence Data

7.1. Special Category Data

COMPTEXT does not, as a rule, actively collect or process Special Category Data (such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health information, or data concerning an individual's sex life or sexual orientation).

If, in exceptional circumstances, the Company is required to process such data (for example, in relation to accessibility requirements for events), this will only be done where strictly necessary and subject to:

- the explicit consent of the Data Subject; or
- another applicable lawful basis and condition for processing under Article 9 GDPR.

7.2. Criminal Offence Data

COMPTEXT does not process data relating to criminal convictions or offences. Should such processing ever become necessary (for example, in the context of safeguarding obligations at an event), it will only take place under the control of official authority or where expressly permitted by applicable law.

7.3. Safeguards

In all cases where Special Category Data or Criminal Offence Data must be processed, COMPTEXT will apply heightened security and confidentiality measures, ensure access is strictly limited, and maintain detailed records of the legal basis and justification for such processing.

8. Data Sharing and Third Parties

8.1. General Principles

COMPTEXT will not disclose Personal Data to third parties except where there is a lawful basis for doing so under Data Protection Laws.

8.2. Processors

Where COMPTEXT engages external service providers (such as IT hosting, payment processors, event management systems, or mailing platforms), those providers act as Data Processors on behalf of COMPTEXT. In such cases:

- Processing will be governed by a written Data Processing Agreement (DPA) in compliance with Article 28 GDPR;
- Processors will act only on documented instructions from COMPTEXT, and Adequate technical and organisational measures must be in place to ensure the security of Personal Data.

8.3. Other Disclosures

Personal Data may also be disclosed:

- where required by law or public authorities;
- where necessary to establish, exercise, or defend legal claims;
- where disclosure is necessary for the performance of a contract or delivery of an event (e.g., sharing participant lists with host institutions for security or logistical purposes).

8.4. Third-Party Controllers

COMPTEXT does not routinely transfer Personal Data to independent third-party controllers. Where this is unavoidable (for example, when engaging

external publishers, funding bodies, or accreditation authorities), COMPTEXT will ensure that a lawful basis exists and that Data Subjects are informed in advance.

9. Data Retention

COMPTEXT retains Personal Data only for as long as is necessary to fulfil the purposes for which it was collected, and in accordance with applicable legal, regulatory, and contractual requirements. Retention periods are determined by reference to:

- the nature and sensitivity of the Personal Data;
- the purposes for which it is processed;
- applicable statutory or regulatory requirements in the relevant jurisdictions;
- the legitimate interests of COMPTEXT in maintaining records for accountability, legal claims, or compliance purposes.

Once the applicable retention period has expired, or where the Personal Data is no longer required for the stated purpose, the data will be securely deleted, anonymised, or otherwise rendered permanently inaccessible.

COMPTEXT applies the following general principles to retention:

- **Event registration and participation data** will be kept only for as long as necessary to administer the event and comply with legal obligations, after which it will be securely deleted or anonymised.
- **Contractual, financial, and payment records** will be retained in accordance with applicable accounting and taxation laws.
- **Correspondence and communications** will be retained only as long as is required to respond and maintain a proper record of interaction.
- **Special Category Data and Criminal Offence Data**, where exceptionally processed, will be subject to stricter retention periods and security measures.

All retention practices are reviewed periodically to ensure compliance with the principles of necessity, proportionality, and data minimisation.

10. Data Security

COMPTEXT takes the security of Personal Data seriously and implements appropriate technical and organisational measures to protect it against unauthorised or unlawful processing, accidental loss, destruction, or damage.

These measures include, but are not limited to:

- Secure storage of digital data using password protection, encryption, and access controls;

- Restricted access to Personal Data, limited to authorised personnel with a legitimate business need;
- Secure physical storage of any paper-based records and controlled access to premises;
- Regular monitoring and review of security procedures, including updates to software and systems;
- Policies, guidance, and training for staff and contractors on their responsibilities in handling Personal Data;
  Procedures for responding promptly to any actual or suspected Personal Data Breaches, in compliance with applicable Data Protection Laws.

COMPTEXT regularly reviews its security framework to ensure that it remains proportionate to the risks associated with the processing activities undertaken.

11. Data Subject Rights

In accordance with the GDPR and applicable Data Protection Laws, individuals whose Personal Data is processed by COMPTEXT ("Data Subjects") have the following rights:

- **Right of Access** to obtain confirmation as to whether Personal Data concerning them is being processed, and, where that is the case, access to the data and related information.
- **Right to Rectification** to request the correction of inaccurate Personal Data and the completion of incomplete Personal Data.
- **Right to Erasure ("Right to be Forgotten")** to request the deletion of Personal Data where there is no lawful basis for its continued processing.
- **Right to Restriction of Processing** to request the limitation of processing under certain circumstances, such as during the verification of contested data accuracy.
- **Right to Data Portability** to receive Personal Data in a structured, commonly used, and machine-readable format, and to transmit that data to another controller, where technically feasible.
- **Right to Object** to object at any time, on grounds relating to their particular situation, to the processing of Personal Data based on legitimate interests or for direct marketing purposes.
- **Rights in Relation to Automated Decision-Making and Profiling** to not be subject to decisions based solely on automated processing, including profiling, which produce legal or similarly significant effects.

Requests to exercise these rights may be submitted to COMPTEXT using the contact details provided in this Policy. COMPTEXT will respond within the timeframes required by law and in accordance with applicable exemptions and limitations.

12. Data Breach Notification

In the event of a Personal Data Breach, COMPTEXT will assess the risk to the rights and freedoms of individuals and, where required, notify the competent supervisory authority within 72 hours. Where the breach is likely to result in a high risk to affected individuals, COMPTEXT will also inform those individuals without undue delay.

13. Sharing of Personal Data

COMPTEXT only shares Personal Data where it is necessary and lawful to do so. Data may be shared with:

- **Host institutions and venues** (universities, research institutes, or other partners) for the organisation and delivery of conferences, workshops and events.
  Service providers and contractors engaged to support COMPTEXT's activities (such as IT support, payment processing, event management platforms, or website hosting). These third parties act as Processors and are bound by written Data Processing Agreements.
- **Social media platforms** (including, but not limited to, LinkedIn, Bluesky and X) where participants, speakers or organisers have given consent for their personal information (e.g. name, institutional affiliation, photograph) to be used for promotional or informational purposes relating to COMPTEXT events.
- **Public authorities or regulators** where required by law, legal proceedings, or to protect COMPTEXT's rights and obligations.

COMPTEXT does not sell or otherwise disclose Personal Data to third parties for marketing or unrelated purposes.

14. Third-Party Links and Services

The COMPTEXT website (https://www.comptextconference.org/) may contain links to external websites and services, including academic institutions, publishers, service providers, and social media platforms (e.g. Bluesky, X/Twitter, LinkedIn, YouTube).

Please note that COMPTEXT is not responsible for the privacy practices of such third parties. Users are encouraged to review the privacy notices of external sites before providing any Personal Data.

15. Changes to this Policy

This Policy is reviewed periodically and may be updated to reflect changes in legal requirements, organisational practices, or technological developments. Any amendments will be published on COMPTEXT's official website. The effective date of the most recent version will be clearly indicated.

16. Contact Information

For any questions, requests or concerns regarding this Policy or the processing of your Personal Data, please contact:

COMPTEXT Association Limited

Email: info@comptextconference.org
Website: https://www.comptextconference.org/