

PRIVACY NOTICE for the Moon Camp Project 2024-2025

Released by: European Space Agency, as Data Controller

Addressed to individuals whose personal data are collected and processed

**Concerning collection and processing initiated by: ESA TEC-XS (Education Office)
(hereinafter referred to as the “Education Office”)**

The European Space Agency (hereafter “the **Agency**” or “**ESA**” or “**We**”) is committed to protecting Personal Data in line with the ESA Framework on Personal Data Protection (herein the “**ESA PDP Framework**”) available at: http://www.esa.int/About_Us/Law_at_ESA/Highlights_of_ESA_rules_and_regulations composed of:

- the Principles of Personal Data Protection adopted by ESA Council on 13 June 2017
- the Rules of Procedure for the Data Protection Supervisory Authority adopted by ESA Council on 13 June 2017
- the Policy on Personal Data Protection (including its Annex entitled “Governance Scheme of the ESA’s Personal Data Protection”) adopted by the Director General of ESA on 1 March 2022 (“**ESA PDP Policy**”).

This notice is intended to describe why and how Your personal data are collected and processed by or on behalf of ESA as Data Controller, on the initiative of the ESA above-mentioned Education Office, as well as what rights You have in relation to Your personal data. It also informs You about the contact details of the Data Protection Officer. This privacy notice was last updated on 02/09/2024. It must be read in conjunction with the ESA PDP Framework and other privacy notices referred to herein.

(1) How can you contact ESA regarding this notice?

The ESA Data Protection Officer (“DPO”) may be contacted in line with the ESA PDP Framework at DPO@esa.int. As the collection and processing concerned by this notice is performed on the initiative of the above-mentioned Education Office questions may also be sent to the e-mail address: education@esa.int

SEPARATE CONTROLLERS:

To know the point of contact for personal data protection matters concerning separate Controllers (which are independently responsible for the collection and processing of personal data they decide upon), please refer to the privacy notices of these separate Controllers. Your queries regarding these matters will not be dealt with by ESA or its DPO.

(2) What kinds of personal data are collected and further processed?

We collect and process various kinds of personal data and may require You to provide personal data for the purposes mentioned later in this notice. Depending on the purpose for which they are collected and further processed, the personal data may include the following:

- **Identity Data:** including Your names, nationality
- **Professional/contact information:** including educator role, email address, and organization/affiliation name, region, city and country;
- **Technical data, including online identifiers:** for example, internet protocol (IP) address or domain names of the devices utilised, login data, browser data, operating system and platform and other technology of the devices you are using; geolocation server logs data, log data;
- **Photo:** Any photographs submitted by you, including those in which other persons are featured.
- **Audio-video recordings, statements, interviews;**
- **Other** personal data that You have to the extent you made them public;
- **Other data, such as:**
 - o Your messages, date, and time the message was sent;

- the content of the questions you have asked;
- other data mentioned in Your messages;
- data You have made public.

(3) **How are Your personal data collected or further processed?**

In addition to the personal data, We collect directly from You (e.g. if you complete and submit a form to, or for, ESA, if You use an platform, tool or website operated by ESA or on behalf of ESA, etc.), We may, depending on Your situation, collect certain personal data about You indirectly including collection of personal data from third-parties.

For instance, depending on the purpose of processing, third parties may be:

- analytics providers or social media platforms and Your data may result from the content You post on social media You consult, from cookies deposited on Your device under the relevant terms and conditions etc.;
- third parties (service providers of ESA, investors concerned by ESA programmes, activities or initiatives, etc.) involved in an area relevant to the purpose of processing etc..

(4) **Why are Your personal data collected and further processed?**

We collect and process Your personal data necessary for the activities conducted to fulfil Our purpose, which is *“to provide for and to promote, for exclusively peaceful purposes, cooperation among European States in space research and technology and their space applications, with a view to their being used for scientific purposes and for operational space applications systems”* (as per ESA Convention). We serve the public interest, and we wish to foster the public interest in space activities and programmes.

All the processing carried out by, or on behalf of, ESA upon initiative of the above-mentioned Education Office falls in this general purpose and, in particular, into one of the reasons permitted under ESA PDP Framework, in particular under ESA PDP Policy.

In any case, we do not process your personal data for activities where our interests are overridden by the impact on you, unless we have your consent or are otherwise required or legally permitted.

Further information on the purpose of processing is provided in each section below, which correspond to various situations that may be relevant to You.

What is the purpose of processing Your personal data?
<p>4.1 IF YOU REGISTER IN THE ESA MOON CAMP PLATFORM (https://mooncampchallenge.org/) (operated by ESA or on behalf of ESA)</p> <p>In particular, Your personal data are collected and further processed for the following purposes:</p> <ul style="list-style-type: none"> (i) to provide you a user account that enables you to access to a personal area on the website (ii) to provide a user account to enable you to submit project(s) (iii) to check the content of your project submission to record statistics on participation in the project (iv) to publish your project(s) in an online gallery on the website (v) to manage your relationship with the Agency as well as your requests and applications in relation to this project (vi) to send you notifications in connection with the project to create participation certificates which contain the teacher/mentor and/or the student team names, organization/affiliation name, city name and/or country. (vii) to highlight and promote the project; to communicate about the project as well as to promote similar events, in the future on any ESA media (viii) to send you notifications about other ESA Education activities (ix) to conduct surveys (x) to share your personal data with the national ESERO, third-party collaborators, contractors and/or partners involved in the organisation of the project (xi) To aggregate information used for statistical purposes.



- (xii) may be used to categorise the browser on your computer and support us in storing user preferences and usage trends on an aggregated basis.
- (xiii) to prevent cyber-attacks and server overload (IP address)

4.4 IF YOU FORMULATE A REQUEST OR A COMPLAINT IN THE EXERCISE OF YOUR RIGHTS

In particular, Your personal data are collected and further processed for the following purposes:

- (i) to handle any questions or complaints you submit to ESA;
- (ii) to respond to any request relating to your rights;
- (iii) to defend ESA from possible liability claims that may arise.

NOTA BENE: If Your personal data processing is subject to one of the situations above, other sections may be relevant to You. You are thus invited to take knowledge of information provided under all the sections that are relevant to your case. In the description of the purpose, we made the choice to avoid duplication.

(5) On what legal grounds do We collect and process Your data?

We process Your personal data pursuant to the ESA PDP Framework, in particular pursuant to Article 5 of the ESA PDP Policy, for fair, specified and legitimate purposes or for purposes compatible therewith. Other ESA Rules and Regulations may serve as legal basis, as they may be indicated to You in additional notices, as appropriate.

What are the legal basis for processing Your personal data?

5.1 General basis for processing under ESA PDP Policy

Generally, the processing referred to in this notice falls under **Article 5.2.1 of the ESA PDP Policy**, i.e.:

- a. for the performance of an activity carried out by ESA within its purpose and in the framework of, and in conformity with, the ESA Convention, the Policy on Personal Data Protection adopted by Director General of ESA on 1 March 2022 “Agreement between the States Parties to the Convention for the establishment of a European Space Agency and the European Space Agency for the protection and the exchange of classified information” done in Paris on 19 August 2002, and the applicable rules and procedures, including ESA Security Regulations and Directives; this includes Processing necessary for ESA’s management and functioning, Dispute Resolution Procedure, and or Investigation Procedures; or
- b. for security; or
- c. for Your legitimate interest; or
- d. for purposes covered by Your Consent, as it may be obtained from You as mentioned herein or under a separate document (e.g. Consent form).

5.3. Consent

When consent is the most appropriate lawful basis for processing, it will be requested from You and you can refuse to consent. Depending on the situation, Your consent may be given by various modalities (e.g. written form, verbally) and may in particular result from:

- (i) use of electronic means, such as mouse-click, swipe, keystroke,
- (ii) use of a service-specific user interface (for example, via a website, an app, a log-on account, the interface of an IoT device or by e-mail), choosing certain settings in connection thereof,
- (iii) filling in electronic consent forms, using digital signatures, sending email(s), filling in web forms for newsletter subscriptions, filling in event registration forms, responding to surveys, filling in and submitting applications,
- (iv) positive behaviour or action, based on the knowledge of the fact that such behaviour or action involves agreement, such as:
 - you send your name and address to us to obtain information from us.

When you consented to specific processing, you may withdraw the consent or exercise your rights in line with Article 9 herein. Unless otherwise advised in a separate notice or by ESA DPO, you can withdraw consent by contacting DPO@esa.int

For example: In case you provided your consent to subscribe to an activity, we may process all the data on your interests to build a profile of the topics you are interested in. If you unsubscribe, we delete retrievable personal data relating to or collected in the context of the activity from our systems and services, including the profile(s) relating to you, where ESA is Controller.

If Your data was processed for several purposes, We will not process personal data for the purposes for which consent has been withdrawn.

(6) In which circumstances may We transfer or provide access to Your personal data?

At times, it is necessary for us to disclose Your personal data to authorised recipients, to the extent this is necessary for carrying out the processing operations referred to in this notice. Typically, the third-party recipients include:

1/ third party providers: We may engage various service providers such as:

- (i) providers involved in marketing, advertising activities, managing newsletters, managing statistics and media services,
- (ii) providers of cloud/data hosting services,
- (iii) providers of website related services,
- (iv) providers enabling Us to manage our contracting process,

2/ ESA governing bodies and authorities and their subordinate bodies, as required by the legal framework applicable to ESA, including ESA Member States' delegations, experts and advisors, for the purposes of performing their role in relation to the Agency, in the light of the ESA Convention and all the applicable rules and regulations;

3/ National institutions which are delivering the ESERO project nationally, which have a contract with ESA for the delivery of educational activities in ESA Member States and Associate States.

4/ The Airbus Foundation, which is a partner of the Moon Camp project

In exceptional cases, for instance in case of a criminal offence evidenced by the collection or processing of data, we may share the said data with the appropriate authorities or bodies, including those having an investigative role or those involved in the concerned legal proceedings.

(7) How long do We retain Your personal data for?

Your data are stored for the shortest time possible, considering the reasons why we need to process Your data, as well as all legal obligations applicable to ESA. The ESA established time limits to erase or review the data stored. Retention periods applied by the ESA are proportionate to the purposes for which they were collected. Thus, the ESA will keep Your personal data for as long as necessary for the fulfilment of those purposes and shall be deleted afterwards. By way of exception, We may keep Your personal data for a longer period, for archiving purposes in the public interest or for reasons of scientific or historical research, being reminded that appropriate technical and organisational measures are put in place (e.g. anonymisation, encryption, etc.).

(8) How do We protect and safeguard Your personal data?

All processing operations are carried out pursuant to ESA Rules and Regulations, including ESA PDP Framework and ESA Security Regulations. In particular, the ESA collects and processes personal data in conditions protecting confidentiality, integrity and security of personal data.

In order to protect Your personal data, ESA has implemented a number of technical and organisational measures against the risks of loss as well as against unauthorised access, destruction, use, modification or disclosure of personal data, in particular when such risks concern sensitive personal data.

These measures consider the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons. They may include, as appropriate, the pseudonymisation and encryption of personal data.

(9) What are Your rights as data subject and how can you exercise them?

Under conditions detailed in the ESA PDP Framework, You have:

- the right to be informed about the identity of the data controller, the contact details of the data protection officer, the purpose of the data processing, the data recipients to whom the personal data shall be disclosed, the rights of rectification or erasure of his/her data, the storage time-limits (if any), the practical modalities of exercising the rights, etc. ; this is the purpose of this privacy notice and any other notice referred to herein ;
- the right to access the personal data We process about You; unless you have access to such data via an account, you may send us your request by email to dpo@esa.int ;
- the right to have Your personal data erased, rectified, completed; if you want to review and correct the personal information, you can either do it yourself, in case you have access to such data via an account, or you may send us your request by email to dpo@esa.int ;
- the right to lodge a complaint before the Supervisory authority, in accordance with the latter's rules of procedure. In case You demonstrate, or have serious reasons to believe, that a data protection incident occurred in relation with Your personal data, following a decision of ESA, you may send notify us thereof by email to dpo@esa.int.

Once a request to erase data is received, we will ensure that the data are deleted unless it can be processed on another legal ground, as mentioned in Article 5.1 above. If Your data was processed for several purposes, We do not process personal data for the part of the processing for which consent has been withdrawn.

For instance:

- Your personal data may continue to be processed for the performance of a legal obligation of ESA or where such data is necessary for the establishment, exercise, or defence of legal claims;
- If there are multiple processing concerning You, based on consent, You have to expressly indicate which consent you wish to withdraw.

When the processing of Your personal data are based on Your consent and unless a specific case applies (e.g. see Article 6 above), You have also the right to withdraw Your consent.

You may wish to exercise any of the above-mentioned rights, by sending a request explicitly specifying Your query to the ESA DPO via e-mail at dpo@esa.int

You may be asked additional information to confirm your identity and/or to assist ESA to locate the data You are seeking.

(10) Specific rules for minors

If the minors of your team(s) want to interact or otherwise engage with ESA, they will often need approval from their parent or legal guardian, as the minor's personal data will be collected for these purposes.

The child will no longer need parental consent once they have reached the age of majority according to the applicable jurisdiction. We will by default ask for parental consent for any child that is below the age of majority in their respective country. We may ask for your contact data (e.g. email address) in order to be able to verify your identity and ensure that We have the explicit consent to collect and use the minor's data.

Table 1: List of ESERO Offices

ESERO Office	Host organisation	Website	Link to Privacy Notice
ESERO Austria	Ars Electronica	https://ars.electronica.art/esero/en/	https://ars.electronica.art/about/de/datenschutz
ESERO Belgium	KU Leuven	https://esero.be	https://admin.kuleuven.be/privacy/
ESERO Czech Republic	Planetum	https://eserocz.cz	https://www.eserocz.cz/zpracovani-osobnich-udaju
ESERO Denmark	House of Natural Sciences	https://esero.dk/	https://esero.dk/cookies-og-privatlivspolitik/
ESERO Estonia	University of Tartu	https://esero.ee/	https://ut.ee/en/content/data-protection-policy
ESERO Finland	Heureka	https://www.esero.fi/	https://www.heureka.fi/tietosuojaseloste/
ESERO France	CNES	https://esero.fr/	https://esero.fr/mentions-legales/
ESERO Germany	University of Bochum	http://esero.de/	http://esero.de/impressum/
ESERO Greece	Aristotle University of Thessaloniki	https://esero.gr/	https://www.auth.gr/en/gdpr-en/
ESERO Hungary	Ministry of Foreign Affairs and Trade, MANT, Muegyetem 1782, ELTE	https://eserohu.hu/	https://designterminal.org/en/privacy-policy
ESERO Ireland	SFI	https://esero.ie/	https://www.sfi.ie/privacy/
ESERO Italy	MUST	https://www.esero.it/	https://www.esero.it/privacy-policy/
ESERO Luxembourg	LSC	https://www.esero.lu/	https://www.esero.lu/legal/?lang=de

ESERO Netherlands	NEMO Science Museum	https://esero.nl/	https://esero.nl/paginas/disclaimer-en-privacyverklaring https://www.nemosciencemuseum.nl/en/about-nemo/termsandconditions/privacy-statement/
ESERO Norway	Andoya Space Education	https://www.esero.no/	https://www.andoyaspace.no/privacy-policy https://learn.andoyaspace.no/personvern/
ESERO Poland	Copernicus Science Center	https://esero.kopernik.org.pl/	https://esero.kopernik.org.pl/wp-content/uploads/2022/01/29_2018-Copernicus-Science-Centres-Data-Protection-Policy.pdf
ESERO Portugal	Ciencia Viva	https://www.esero.pt/	https://www.cienciaviva.pt/sobre/privacidade
ESERO Romania	ROSA	http://www.esero.ro/	https://ec.europa.eu/info/law/law-topic/data-protection_en
ESERO Slovenia	Ministrstvo za vzgojo in izobraževanje ter Ministrstvo za gospodarstvo, turizem in šport	http://esero.si/	https://www.csod.si/stran/Varstvo-osebni-podatkov
ESERO Spain	Parque de las Ciencias	https://esero.es/	https://esero.es/politica-de-privacidad/
ESERO Sweden	KTH Royal Institute of Technology	https://www.esero.se/	https://intra.kth.se/en/anstallning/anstallningsvillkor/att-vara-statligt-an/behandling-av-person/dataskyddsförordningen-gdpr-1.800623 https://www.esero.se/om-oss/integritetspolicy/
ESERO UK	STEM Learning	https://www.stem.org.uk/esero/	https://www.stem.org.uk/privacy-policy

*ESEROs in Switzerland and Latvia may be established during the period October 2024 and June 2025. The name of the organisations, domains and privacy policies will be added as soon as these are operational.

Table 2. List of National Space Agencies/Offices

National Space Agency/Office	Website	Link to Privacy Notice
Austrian Aeronautics and Space Agency	https://www.ffg.at/en/content/aeronautics-and-space-agency-0	https://www.ffg.at/en/privacy-policy
BELSPO, Belgium	https://www.belspo.be/	https://www.belspo.be/belspo/organisation/privacy_nl.stm
Canadian Space Agency	https://www.asc-csa.gc.ca/	https://www.asc-csa.gc.ca/eng/terms.asp
Ministry of Transport of the Czech Republic	https://www.mdcz.cz/	https://www.mdcz.cz/Ministerstvo/Ochrana-osobnich-udaju-

		(GDPR)/memo?returl=/Ministerstvo/Ochran a-osobnich-udaju-(GDPR)
Danish National Space Center	https://www.space.dtu.dk/	https://www.dtu.dk/english/About/strategy-policy/Policies/Privacy-policy
CNES, France	https://cnes.fr/	https://cnes.fr/en/node/47
DLR, Germany	https://www.dlr.de/en/ar	https://www.dlr.de/en/service/privacypolicy
Estonia Space Office	https://eas.ee/en/estonian-space-office/	https://eas.ee/isikuandmete-tootlemine/
Finland – Heureka Science Center	https://www.heureka.fi/	https://www.heureka.fi/pages/tietosuojaseloste
Greek Ministry of Digital governance	https://mindigital.gr/	https://www.gov.gr/info/politiki-aporritou https://www.secdigital.gov.gr/politiki-aporritoy/
Hungarian Space Office	http://www.hso.hu/	https://kormany.hu/sutikezelesi-tajekoztato.pdf
Irish Department of Education and Skills	www.education.ie	https://www.gov.ie/en/help/privacy-policy/
Italian Space Agency (ASI)	https://www.asi.it/en/	https://www.asi.it/privacy-policy/
Latvian Space Office	https://latviaspace.gov.lv/en/latvian-space-office/	https://www.em.gov.lv/en/privacy-policy
Lithuanian Space Office	https://mita.lrv.lt/en/about-mita/lithuanian-space-office	https://mita.lrv.lt/en/about-mita/privacy-policy
Luxembourg Space Agency	https://space-agency.public.lu/en.html	https://space-agency.public.lu/en/support/aspects-legaux.html
Netherlands Space Office	https://www.spaceoffice.nl/nl/	https://www.spaceoffice.nl/nl/contact/privacy/
Norwegian Space Agency	https://www.romsenter.no/en	https://www.romsenter.no/en/privacy-statement
POLSA (Polish Space Agency)	https://polsa.gov.pl	https://polsa.gov.pl/polityka-prywatnosci/
Portuguese Space Agency	https://ptspace.pt/	https://ptspace.pt/privacy-policy/
Romanian Space Agency	http://www.rosa.ro/index.php/en/	https://rosa.ro/wp-content/uploads/2014/04/Informare_prelucrarea_datelor_cu_caracter_personal.pdf
Slovak Space Office	https://spaceoffice.sk/	https://www.sario.sk/sk/o-nas/ochrana-osobnych-udajov https://www.vlada.gov.sk/informacna-povinnost-prevadzkovatela/?csrt=471334995879443159
Slovenian Space Office- Ministry of Economic Development and Technology	https://www.gov.si/en/state-authorities/ministries/ministry-of-the-economy-tourism-and-sport/about-the-ministry-of-	https://www.gov.si/o-spletnem-mestu/zasebnost-in-varstvo-osebnihpodatkov/



	economy-tourism-and-sport/slovenian-space-office/	
CDTI, Spain	https://www.cdti.es/	https://www.cdti.es/privacidad-y-de-proteccion-de-datos
Swedish National Space Agency	https://www.rymdstyrelsen.se/en/	https://www.rymdstyrelsen.se/om-rymdstyrelsen/behandling-av-personuppgifter/
Swiss Space Office	https://www.sbf.admin.ch/sbf/en/home/research-and-innovation/space.html	https://www.admin.ch/gov/en/start/terms-and-conditions.html
UK Space Agency	https://www.gov.uk/government/organisations/uk-space-agency	https://www.gov.uk/government/publications/uk-space-agency-gdpr-privacy-notice
Malta Council for Science and Technology	https://mcst.gov.mt/	https://mcst.gov.mt/privacy-policy/