

## Privacy Policy

**Effective date:** 4.6.2026

CLIC Innovation Ltd (“CLIC Innovation”, “we”, “us”) processes personal data in accordance with applicable data protection legislation, including the General Data Protection Regulation (EU) 2016/679 (“GDPR”).

This Privacy Policy describes how we process personal data collected through the website [www.balticseah2valley.eu](http://www.balticseah2valley.eu) (“Website”), operated by CLIC Innovation Ltd as part of the BalticSeaH2 project.

### 1. Controller

CLIC Innovation Ltd  
Elielinaukio 2 G  
00100 Helsinki, Finland

Email: [info@clicinnoation.fi](mailto:info@clicinnoation.fi)

### 2. What personal data do we process?

We may process the following categories of personal data collected through the Website:

- contact information submitted through website forms, such as name, organization, email address and phone number;
- communications and inquiries sent through the Website;
- technical and usage information, such as IP address, browser type, device information, visited pages and timestamps;
- cookie and analytics data;

### 3. Purposes and legal bases for processing

We process personal data for the following purposes:

Purpose of processing	Legal basis
Responding to inquiries and contact requests	Legitimate interest
Providing and maintaining the Website	Legitimate interest

Purpose of processing	Legal basis
Website analytics and performance monitoring	Legitimate interest / consent where required
Ensuring website security and preventing misuse	Legitimate interest
Compliance with legal obligations	Legal obligation

Where processing is based on legitimate interest, we consider the processing necessary for operating, maintaining and developing the Website, communicating with stakeholders and ensuring information security.

#### 4. Cookies and analytics

The Website uses cookies and similar technologies to:

- ensure website functionality;
- improve user experience;
- analyze website traffic and usage;
- support communications and marketing activities.

The Website uses different categories of cookies, including necessary cookies required for the operation of the Website, analytical cookies used to understand and improve website performance, and marketing cookies used in connection with embedded content and communications.

We may use third-party service providers, such as Google Analytics, to collect information about the use of the Website and to help us analyze and improve our services.

Where required by applicable law, cookies that are not strictly necessary for the operation of the Website are used only after the user has provided consent through the cookie consent banner or preference centre.

Users can manage, modify or withdraw their cookie preferences at any time through the cookie consent banner or preference centre available on the Website.

A current list of cookies used on the Website, including information on their purposes, providers and retention periods, is available through the cookie preference centre.

## **5. Sources of personal data**

Personal data is collected:

- directly from users through forms and communications;
- automatically through cookies and website analytics tools;

## **6. Recipients of personal data**

Personal data may be disclosed to:

- IT and website service providers;
- analytics and hosting service providers;
- authorities where required by law.

Personal data is processed only to the extent necessary for the purposes described in this Privacy Policy.

## **7. International transfers**

Some service providers used in connection with the Website may process personal data outside the European Union or European Economic Area.

In such cases, CLIC Innovation ensures that appropriate safeguards are implemented in accordance with GDPR requirements, such as:

- the European Commission's adequacy decisions; or
- the European Commission's Standard Contractual Clauses (SCCs).

## **8. Retention periods**

Personal data is retained only for as long as necessary for the purposes described in this Privacy Policy or as required by law.

## **9. Data security**

We implement appropriate technical and organizational measures to protect personal data against unauthorized access, disclosure, loss, misuse or alteration.

## **10. Rights of data subjects**

Under GDPR, individuals have the right to:

- access their personal data;
- request rectification of inaccurate data;
- request erasure of data where applicable;
- request restriction of processing;
- object to processing based on legitimate interest;
- withdraw consent where processing is based on consent;
- lodge a complaint with a supervisory authority.

Requests concerning personal data may be submitted using the contact details above.

### **11. Changes to this Privacy Policy**

We may update this Privacy Policy from time to time. The latest version will always be available on the Website.

### **12. Contact information**

If you have questions regarding this Privacy Policy or the processing of personal data, please contact:

CLIC Innovation Ltd  
info@clicinnovation.fi