

# Privacy Policy

This privacy policy explains how the InnerWorld: Virtual Reality for Psychosocial Support (VRPS) project website handles personal data. InnerWorld is an Erasmus+ KA210 project, delivered by a consortium of organisations in Türkiye, Bulgaria, and France.

## Who we are

The controller for this website is Ankara Bilim Üniversitesi (Türkiye), acting on behalf of the InnerWorld consortium: Ankara Bilim Üniversitesi (Türkiye), Foundation “Situational Center Open Doors” (Bulgaria), and Centre de ressources ukrainien (France).

Contact Information:

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## Scope

This policy covers the public website and its forms, events pages, newsletters, and cookies. If you use the separate VR tool or any external platforms linked from the site, those services will provide their own privacy terms.

## What data we collect through the website

We collect only what we need to run the site and respond to you:

- contact details you enter in forms (name, email, message)
- technical data from your browser (IP address, device, basic diagnostics) for security and performance
- your cookie preferences and, if you consent, analytics signals

## Why we process your data and legal bases

We process personal data under the GDPR's lawful bases:

- to respond to enquiries and manage events, based on performance of a contract or steps at your request, and legitimate interests in running the project site
- to place non-essential cookies, based on your consent (which you can withdraw at any time)
- to secure and maintain the website (for example, server logs and security monitoring), based on our legitimate interests
- to meet legal obligations where applicable

These bases derive from Articles 5 and 6 and the transparency duties in Articles 12–14 of the GDPR. ([EUR-Lex](#))

## Cookies and analytics

We use strictly necessary cookies to make the site work. All non-essential cookies (for example, analytics) will run only after you give consent through our cookie banner. You can change your choice at any time via “Cookie settings.”

This approach follows Article 5(3) of the ePrivacy Directive, which requires prior consent for storing or accessing information on your device, except for cookies strictly necessary to provide the service you request. The validity of consent is further governed by the GDPR and the EDPB's Consent Guidelines (freely given, specific, informed, unambiguous, and as easy to withdraw as to give). ([EUR-Lex](#), [European Data Protection Board](#))

## Children and young people

Because the project engages displaced youth, this site may be used by people under 18. Under Article 8 GDPR, Member States may set the digital age of consent between 13 and 16; if a user is below that threshold, parental authorisation is required. ([GDPR](#))

We do not collect special-category data (such as health information) via the website. If you voluntarily share sensitive details in a free-text field, we will delete them or ask for explicit consent where appropriate under Article 9 GDPR. ([EUR-Lex](#))

## When partners act together

The website is operated for a consortium. For some activities—such as co-organised events—the partners may jointly determine purposes and means and therefore act as joint controllers. In those cases, the partners will make the essence of their Article 26 arrangement available and identify a contact point. ([GDPR](#), [European Data Protection Board](#))

## Sharing your data

We share personal data only with:

- service providers who host the site, send emails, provide analytics or security, or support event management (bound by data processing agreements)
- public authorities if required by law

We do not sell or rent your data.

## International transfers

If data moves outside the EEA—for example, to a service provider or to a consortium partner in a country without an adequacy decision—we will use one of the GDPR’s transfer mechanisms, typically the European Commission’s Standard Contractual Clauses (SCCs). Where an adequacy decision exists (for example, the EU-US Data Privacy Framework for certified US companies), transfers may rely on that decision. ([EUR-Lex](#), [European Commission](#))

## How long we keep data

We retain personal data only as long as necessary for the purposes above:

- contact enquiries: typically up to 24 months after closure
- event records: up to 24 months after the event unless a longer period is needed for reporting obligations
- server logs and security records: typically up to 6 months
- consent records and cookie logs: as required to demonstrate compliance

We may keep aggregated, non-identifiable statistics longer.

## Security

We apply appropriate technical and organisational measures such as encryption in transit, access controls, least-privilege practices, and regular updates. Article 32 of the GDPR requires security appropriate to risk. ([EUR-Lex](#))

If we suffer a personal data breach, we will assess the risk and, where required, notify the relevant supervisory authority within 72 hours and inform affected individuals without undue delay, in line with Articles 33 and 34 and EDPB guidance on breach notification. ([GDPR](#), [European Data Protection Board](#))

## Your rights

Under the GDPR you can, in most cases:

- request access to your data and a copy
- ask us to correct inaccuracies
- ask us to delete data or restrict processing
- object to certain processing, including direct marketing
- receive your data in a portable format
- withdraw consent at any time, where consent is the legal basis

These rights appear in Chapter 3 (Articles 12–22). You may also lodge a complaint with your local data protection authority; a list of authorities is available from the European Data Protection Board. ([GDPR](#), [European Data Protection Board](#))

We respond to rights requests without undue delay and within one month, extendable by two months for complex requests, as set out in Article 12(3) and reflected in EDPB guidance for SMEs. ([GDPR](#), [European Data Protection Board](#))

## How to exercise your rights or contact us

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For any cookie choices, use the “Cookie settings” link available on every page.

## Third-party links and embeds

Our site may link to third-party websites or embed content (for example, a video). Those providers operate under their own privacy policies. Non-essential third-party embeds will only load after you consent through our banner.

## Changes to this policy

We will update this policy when our practices change or when the law requires. Material changes will be highlighted on this page with a new effective date.

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Sources underpinning this policy

GDPR text and core duties, including lawful bases, transparency, security, breach notification, and rights. ([EUR-Lex](#))

EDPB Guidelines 05/2020 on consent; ePrivacy Directive Article 5(3) on cookies. ([European Data Protection Board](#), [EUR-Lex](#))

Joint controllership concepts (Article 26) and the duty to share the essence of arrangements. ([GDPR](#), [European Data Protection Board](#))

International transfers, SCCs, and adequacy decisions. ([EUR-Lex](#), [European Commission](#))