

# PRIVACY POLICY — ircbb.com (Website Visitors)

Last Updated: December 2025

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This Privacy Policy explains how ircbb.com (the “Website”) processes Personal Data in connection with website access and communications. It is intended to provide clear transparency in accordance with the EU General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679) where applicable and applicable rules on cookies and similar technologies (“Cookie Rules”). This Privacy Policy applies to Website visitors and to individuals who contact us by email.

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## 1) Controller and Contact (Who is Responsible)

Controller: IRCBB Website Administration (the individual(s) responsible for operating and maintaining the Website).

Primary privacy contact [info@ircbb.com](mailto:info@ircbb.com)

Note: Data protection responsibilities attach to the person(s) who determine the purposes and means of processing for this Website, regardless of whether the Website relates to a voluntary scientific collaboration.

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## 2) Minimal-Data Website Design (What We Do Not Do)

We designed this Website to be minimal-data. We do not intentionally:

- operate user accounts, member areas, or newsletters on the Website,
- run advertising, paid promotions, or transactions through the Website,
- use Google Analytics, advertising identifiers, marketing/remarketing pixels (e.g., Meta Pixel), or behavioral profiling,
- sell, rent, or trade Personal Data,
- perform automated decision-making or profiling about visitors.

## 3) Personal Data We May Process

### 3.1 Technical and Log Data (automatic)

When you access the Website, limited technical data may be processed automatically for core operation, delivery, and security, such as:

- IP address,
- device and browser information (e.g., user agent),

- timestamps and basic request/log information,
- security/diagnostic data necessary to deliver the Website and protect it against abuse (e.g., anti-bot/anti-fraud signals).

We do not use this technical data to market to you, build visitor profiles, or conduct behavioral tracking.

### **3.2 Cookie and Preference Data (where applicable)**

If a cookie banner / privacy center is enabled, the Website and/or the hosting platform may process:

- your cookie preference status (consent choices),
- technical identifiers required to remember or apply your choices.

### **3.3 Communication Data (only if you contact us)**

If you contact us at [info@ircbb.com](mailto:info@ircbb.com), we may process:

- your email address and any name you choose to include,
- message content and related metadata (date/time, headers),
- any attachments or information you voluntarily provide.

Please do not send sensitive personal data (e.g., health data) unless strictly necessary for your inquiry. If you voluntarily include such data, we will apply strict minimization and limit processing to what is necessary to handle the communication and/or legal defense.

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## **4) Purposes of Processing**

We process Personal Data only for the following purposes (as applicable):

1. Website delivery and functionality (rendering pages, enabling core features).
2. Security and abuse prevention (protecting the Website and users, detecting/mitigating fraud or abuse, ensuring service integrity).
3. Consent management (recording and respecting cookie choices, where applicable).
4. Responding to communications you initiate (e.g., academic/general inquiries).
5. Legal compliance and legal defense (where necessary to comply with law or establish, exercise, or defend legal claims).

## **5) Legal Bases (GDPR)**

Depending on the context and applicable law, we rely on one or more of the following:

### **5.1 Website technical processing (GDPR)**

GDPR (where applicable): Article 6(1)(f) — Legitimate Interests

Our legitimate interests include delivering the Website reliably, maintaining network and information security, preventing abuse/fraud, and protecting the integrity of the Website and hosting environment.

You have the right to object to processing based on legitimate interests (GDPR Article 21), as described in Section 12.

## **5.2 Non-essential cookies/scripts (if ever used)**

GDPR (where applicable): Article 6(1)(a) — Consent, together with applicable Cookie Rules

Non-essential cookies/scripts (e.g., optional functional or analytics features, if enabled) are activated only after consent through cookie controls. You can withdraw or modify consent at any time. Withdrawal does not affect the lawfulness of processing prior to withdrawal.

## **5.3 Email communications you initiate**

GDPR (where applicable): Article 6(1)(b) and/or Article 6(1)(f)

## **5.4 Legal obligations / legal claims**

GDPR (where applicable): Article 6(1)(c) and/or Article 6(1)(f)

## **6) Is Provision of Data Required?**

- You are not required to provide Personal Data to browse the Website.
- If you contact us by email, providing your email address and message content is necessary for us to receive your inquiry and (if you request it) to respond.

## **7) Cookies and Similar Technologies**

We aim to keep cookies and similar technologies to a minimum.

### **7.1 Essential cookies**

Essential cookies (and similar technologies) may be used for core functionality and security (e.g., security and anti-abuse mechanisms, load balancing, stability).

### **7.2 Optional cookies (only with consent, if enabled)**

If optional cookies are ever enabled, they should be controlled via cookie settings (banner/privacy center, where applicable) and activated only with consent where required.

### **7.3 Browser controls**

You can also control cookies through your browser settings. Blocking essential cookies may affect Website functionality.

## **8) Hosting Provider, Recipients, and Sharing**

The Website is hosted on Wix.com Ltd (“Wix”). Wix provides hosting and related infrastructure services and publishes a Data Processing Agreement for Wix users.

### **8.1 Wix roles (processor and/or independent controller)**

Depending on the specific activity and configuration:

- Wix may process certain data as a processor on behalf of website operators for infrastructure services (hosting, delivery, security), and/or
- Wix may process certain limited technical data as an independent controller for purposes such as security, fraud prevention, service integrity, diagnostics, and compliance with legal obligations.

### **8.2 Recipients**

We do not share visitor data for marketing or advertising.

Personal Data may be processed by:

- Wix and its authorized sub-processors strictly for hosting, delivery, security, and infrastructure purposes.
- Professional advisors (e.g., legal/IT/security) only where necessary for compliance, security, or legal defense, and only to the extent required.
- Authorities where required by law or valid legal process.

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## **9) International Transfers (Cross-Border Processing)**

Because hosting and security infrastructure may be distributed, Personal Data may be processed in multiple jurisdictions (including inside or outside the EU/EEA), depending on the hosting provider’s service delivery and security needs.

GDPR (where applicable): Where transfers outside the EU/EEA occur and no adequacy decision applies, appropriate safeguards (such as Standard Contractual Clauses) may be used by relevant parties, along with supplementary measures where required.

## **10) Data Retention**

We do not maintain user accounts or a public visitor database.

- Technical logs/security data (where applicable): retained for limited periods necessary for security, abuse prevention, troubleshooting, and legal compliance, consistent with operational requirements and hosting practices.
- Email communications: retained only as long as reasonably necessary to respond to your inquiry and administer correspondence and then deleted or archived according to reasonable administrative needs and applicable limitation periods for legal claims/defense.

Where feasible, we delete or anonymize data when it is no longer necessary.

## **11) Security**

We implement appropriate technical and organizational measures to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorized access, or disclosure, taking into account the nature of processing and risk.

No method of transmission or storage is 100% secure. We apply reasonable safeguards to reduce risk.

## **12) Your Rights (GDPR)**

GDPR (where applicable):

Subject to applicable law and circumstances, you may have the right to:

- access,
- rectification,
- erasure,
- restriction,
- objection,
- data portability (where applicable),

and the right to withdraw consent at any time (where processing is based on consent).

Practical limitations (GDPR Article 11):

Because we do not operate accounts and generally process limited technical data, we may not be in a position to identify you from logs alone. In such cases, GDPR Article 11 may apply. We will still assist to the extent reasonably possible and may request limited additional information to locate relevant records (e.g., approximate date/time of visit and browser/device details).

To exercise rights or make GDPR requests, contact: [info@ircbb.com](mailto:info@ircbb.com).

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## **13) Complaints / Supervisory Authorities**

GDPR (where applicable):

You have the right to lodge a complaint with a data protection supervisory authority, in particular in the EU Member State of your habitual residence, place of work, or the place of the alleged infringement (GDPR Art. 77).

## **14) Children**

The Website is not directed to children, and we do not knowingly collect Personal Data from minors.

## **15) External Links**

The Website may contain academic references and links to third-party websites. We do not control third-party content or privacy practices. Please review third-party privacy notices before providing Personal Data to them.

## **16) AI / Dataset Use**

We do not intentionally collect Website visitor data for AI training, do not build visitor datasets, and do not sell or exchange visitor interaction data.

## **17) Changes to This Policy**

We may update this Privacy Policy by posting an updated version on this page and revising the “Last Updated” date. The version published on the Website is the current version.

## **18) Contact**

For privacy questions or to exercise your rights: [info@ircbb.com](mailto:info@ircbb.com)

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### **Optional Appendix A — Cookie Notice (Categories)**

This Website aims to remain minimal. Depending on configuration and hosting requirements, cookies may fall into:

1. Strictly Necessary (Essential): core functionality, security, abuse prevention, stability.
2. Functional (Preferences) (if enabled): remember user interface preferences.
3. Analytics (Statistics) (if enabled): aggregated usage measurement to improve performance/content (not for advertising).
4. Marketing: not intentionally used.