



DATA PROTECTION NOTICE

ConсорX is an EU-based digital platform for small and medium-sized enterprises (SMEs) collaborating on public tenders. We take your privacy seriously and comply fully with the EU's General Data Protection Regulation (GDPR). ConsorX is the **data controller** and commits to processing your personal and company data lawfully and transparently. Under GDPR, we must process data fairly and only for specified, legitimate purposes. This Notice explains what data we collect, how we use it during the pre-bidding and post-award phases, how we secure it, and what rights you have as a data subject.

Data Collected

We collect and process **personal data** and **company data** needed to support your participation in public procurement. "Personal data" means any information that identifies you as an individual. Examples we collect include:

- **Contact and Profile Data:** Name, title, corporate email, phone number, job role or position, credentials (e.g. professional background, qualifications), and other personal details you provide.
- **Company Data:** Company name, legal form, registration number, VAT or tax ID, business address, size (e.g. number of employees, turnover), sector, products or services offered, and credentials (certificates or licenses).
- **Tender/Consortium Data:** Information about the public tenders you select (tender documents, requirements, deadlines) and details of any consortium proposals or awarded contracts you participate in.
- **Usage and Technical Data:** Usernames and passwords, IP address, browser and device information, cookies and similar identifiers, and activity logs (for security, site analytics, and to improve our services).

We collect this data directly from you (e.g. account registration, profile creation, bid submissions) or from public sources (e.g. company registers, public tender announcements). We may also aggregate or anonymize data for reporting and improvement of our services.



DATA PROTECTION NOTICE

Purposes of Processing

ConsorX uses your data to facilitate SME participation in public procurement at every stage:

- **Opportunity Analysis & Matching:** We analyze tender descriptions and your company profile (including skills and past projects) to recommend relevant opportunities and potential SME partners. Machine-learning tools (“AI”) assist by highlighting key requirements and matching profiles with tenders and consortia structures.
- **Consortium Formation:** When forming a bidding consortium, we use your contact and profile data to suggest suitable partners. With your consent, basic contact details (company name, SME rep name and email) may be shared with other consortium members to coordinate collaboration.
- **Bidding Support:** Our platform helps structure proposals. We process tender documents and project plans you upload to support bid preparation. All such data is treated confidentially.
- **Contract Execution Support:** After a tender is awarded, ConsorX can be used to manage project tasks. We may process project-related data (milestones, deliverables, communications) to support consortium coordination and contract performance.
- **Platform Operation:** We process data to operate the platform (manage user accounts, authenticate users, send notifications) and to secure our service (prevent fraud, protect against abuse, log system activity).

When using AI or automated analysis, we ensure **lawful basis** and **transparency**. GDPR requires a valid legal ground for automated profiling or decision-making. ConsorX’s AI tools only **assist** human decision-making (e.g. by scoring or suggesting matches); final decisions always involve human review. You will be informed if any automated processing is used, and you have the right not to be subject to solely automated decisions. If a process involves significant automated decisions, you have the right to contest them and request human intervention.



DATA PROTECTION NOTICE

Lawful Basis for Processing

We process your data only when permitted by law. Under GDPR Article 6, the lawful bases for our processing include:

- **Contract Performance:** We may process data necessary to provide the ConsorX service you requested (e.g. providing access, matching you with tenders, fulfilling any contract we have with you).
- **Legal Obligation:** We process data to comply with legal or regulatory duties (for example, financial reporting or anti-fraud checks required by public procurement rules).
- **Legitimate Interests:** In some cases, we rely on our legitimate interests (for example, improving our platform's functionality, matching SMEs to tenders, and protecting our services from fraud) provided such interests do not override your rights.
- **Consent:** Where required (for example, processing sensitive data or direct marketing), we will obtain your explicit consent. You can withdraw any consent at any time, and processing based on consent will cease if you withdraw.

Data Sharing

ConsorX does **not sell** your personal data. We share data only as needed to operate the platform or when legally required:

- **Consortium Members:** With your agreement, we share relevant contact and profile information with other SMEs in your chosen consortium so you can work together on a bid.
- **Public Authorities:** When necessary for tender participation, we may transmit data to contracting authorities (e.g. submission of a bid or reporting requirements) in compliance with public procurement procedures.
- **Service Providers:** We use third-party service providers (such as hosting companies, IT support, data analytics, and marketing platforms) to run the platform. These providers are bound by contracts that require them to protect data and only process it for our purposes.



DATA PROTECTION NOTICE

- **Legal Requirements:** We may disclose personal data if required by law or in response to valid legal processes (e.g. court orders, audits by authorities) or to enforce our terms of service.

Any data transferred to third parties is done securely. If personal data is sent outside the EU/EEA (e.g. cloud servers), we ensure it is protected by adequate safeguards (such as Standard Contractual Clauses) as required by law.

Data Security and Retention

We implement appropriate technical and organizational measures to secure your data. For example, data is stored on secure servers (typically within the EU), protected by encryption, firewalls, and access controls. Only authorized personnel may access personal data, and we regularly review our security practices. We retain your data only as long as needed for the purposes above (for example, while you use our service and as long as required by law). For awarded projects, certain data may be retained for audit or legal compliance (typically several years after contract completion).

In the unlikely event of a data breach affecting your personal data, we will follow GDPR rules: we will notify the relevant Data Protection Authority within 72 hours if the breach risks individuals' rights, and inform any affected individuals if required.

Your Rights under GDPR

Under GDPR, you have the following rights regarding your personal data:

- **Right of Access:** You can request confirmation of whether we process your data and obtain a copy of your personal data.
- **Right of Rectification:** You can ask us to correct or complete any inaccurate or incomplete data we hold about you.
- **Right to Erasure:** In certain cases you can request deletion of your personal data (the "right to be forgotten"), for example when the data is no longer needed for its original purpose.



DATA PROTECTION NOTICE

- **Right to Restrict Processing:** You may request that we suspend processing of your data while a dispute is resolved.
- **Right to Object:** You can object at any time to our processing based on legitimate interests or public interest. If you object, we must stop processing unless we demonstrate compelling grounds that override your interests. You also have an absolute right to opt out of direct marketing.
- **Right to Data Portability:** If processing is based on your consent or a contract, you have the right to receive your personal data in a structured, machine-readable format and transmit it to another controller.
- **Rights related to Automated Processing:** You have the right to be informed about automated decision-making or profiling (e.g. AI analysis) and to request human review of any decisions that significantly affect you.
- **Right to Withdraw Consent:** If you gave consent for any processing (e.g. receiving marketing materials), you can withdraw it at any time, without affecting processing done before withdrawal.
- **Right to Lodge a Complaint:** You may file a complaint with a national Data Protection Authority if you believe your rights are violated.

To exercise any of these rights or if you have any questions about your data, please contact us (see below). We will respond to your request promptly and at the latest within one month (or two months for complex requests), as required by law.

Contact Information

Our Data Protection Officer (DPO) can be contacted at: Email: info@consorx.ai

Please direct all data inquiries, requests, or complaints to the DPO. We strive to answer all requests and maintain transparency. For more information about GDPR and your rights, you may visit the European Commission's data protection web pages or contact your local Data Protection Authority.