ESA PRIVACY NOTICE FOR HERA COMPANION

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 RES-I Department (hereinafter referred to as the "Department")**

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 Department, 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 July 2026. 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. Specific information is available upon request from the DPO.

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**: first name, last name, and email address (obtained through the identity provider used to sign in), account identifier.
- **Conversation data**: the content of your interactions with the assistant, including chat messages and voice interactions.
- **Personalization data**: preferences and retained conversational context used to tailor responses.
- **Session data**: active session and conversation state.
- **Technical data**: IP address, device/connection information, and activity logs generated while using the service.

Hera Companion is an AI-powered assistant. **Do not include personal data in your prompts.** Avoid entering your own or other people's personal data (such as names, contact details, or any other identifying information) when interacting with the assistant.

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

ESA processes Your personal data by:

- providing an AI-based conversational assistant (chat and voice) accessible online, through which You submit queries and interact with the service;
- collecting Your identity data from the external identity provider You choose to sign in with (Microsoft, Google, Apple, or email one-time passcode);
- automatically generating and storing conversation history, personalization data and session state in order to operate the service and tailor responses;
- automatically collecting technical data (such as IP address and activity logs) generated while You use the service, for operational and security purposes;
- commissioning processors to develop, host, operate and support the service.

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 Department 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 by clicking on links associated with each section below, which correspond to various situations that may be relevant to You.

What is the purpose of processing Your personal data?
IF YOU VISIT AN ESA WEBSITE (operated by ESA or on behalf of ESA) Your personal data are collected and further processed for the performance of public service tasks related to ESA's mission under the ESA Convention, including for ESA for the purposes of communication activities, such as sending e-mails and invitations (this entails the management of contact lists for correspondence), for statistical and analytical purposes and, generally, for the promotion of ESA's activities, programmes and initiatives. In particular, Your personal data are collected and further processed: (i) to inform and raise awareness among the general public in particular in ESA Member States; (ii) to perform qualitative media monitoring; (iii) to conduct analytics with the aim to raise awareness or to conduct surveys on topics related to space activities, programmes, initiatives and to ESA missions, programmes and activities; (iv) to analyse and monitor Your interactions with the website, including monitoring and analysis of website use, traffic and interactions; (v) to deal with your current and future queries or requests submitted via website(s) or to otherwise engage with you;

(vi) to analyse and monitor Your reactions to ESA activities, programmes and initiatives as well as to various posts, statements or declarations made in connection with space activities, programmes, and initiatives, in particular to optimise Our communication and Your engagement on websites;
(vii) to ensure audience measurement;
(viii) to grant a user access to specific functionalities of the website that require authentication;
(ix) to better understand the needs and the browsing experience of ESA website visitors;
(x) to gather statistics with a view to improving our communication and to enhance the user experience;
(xi) to identify and track unauthorised access or any attempts to access our servers without permission;
(xii) to delete comments that seem to us as not relevant to the topic of website or account, offensive, abusive, etc.
(xiii) to defend ESA's rights and interests, including to defend ESA from possible liability claims that may arise in connection with Our communication activities.

When using ESA websites You may find information (such as links to third-party websites) governed by separate terms and conditions. In You voluntarily registration for and use such third-party websites, their applicable terms and conditions and privacy policies apply, and ESA has no control thereof. The use of third-party websites accessible via information present on ESA websites does not entail endorsement by ESA of the related terms and conditions or privacy policies.

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.

IF YOU USE ESA INFORMATION AND COMMUNICATION TECHNOLOGY (IT) INFRASTRUCTURE, TOOLS, AND SERVICES (OPERATED BY ESA OR ON BEHALF OF ESA)
Your personal data may be collected and further processed for the purposes of enabling the Agency to comply with its obligations under the ESA Personal Data Protection Framework, in particular:
i. to provide optimised data flow between target environments in an automated manner;
ii. to provide and as applicable to discontinue Your access to the IT infrastructure, tools and services operated by or on behalf of ESA;
iii. to provide access and proper performance of the service to end-users;
iv. to provide support services and to ensure the management and maintenance of the service;
v. to enable ESA to perform actions in connection with identity and access management, incident prevention, management or reporting;
vi. to ensure data subject rights management;
vii. to protect, enforce or defend the Agency's rights and interests in connection with any matter arising in relation to Your use;
viii. to defend the Agency from possible liability claims that may arise in connection with Your use;
ix. to ensure personal data quality and accuracy.

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?

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 ESA and the European Space ESA 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 compliance with a legal obligation to which ESA is subject; or
c. for tasks in the frame of ESA's cooperation with the competent authority of Member States, in order to facilitate the proper administration of justice; or
d. for security; or
e. for the performance of a contract concluded by ESA within its purpose in relation with an activity carried out by ESA in the framework of, and in conformity with, the ESA Convention and the applicable rules and procedures;
f. for Your legitimate interest; or
g. 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).

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) filling in paper consent forms, responding to questionnaires,
(ii) oral statements or gestures (e.g. a nod of the head) that signifies agreement (e.g. for instance, expressed in a video or voice recording),
(iii) use of electronic means, such as mouse-click, swipe, keystroke,
(iv) 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,
(v) filling in electronic consent forms, using digital signatures, sending email(s), sending SMS, filling in web forms for newsletter subscriptions, filling in event registration forms, responding to surveys, filling in and submitting applications,
(vi) positive behaviour or action, based on the knowledge of the fact that such behaviour or action involves agreement, such as:
- you enter into an area covered by a privacy notice on video recording;
- you drop your business card in an area dedicated to collecting information for the purposes indicated in that area;
- you publicly express opinions, make statements, create posts, share declarations, aware of the fact that each of them may trigger responses in connection with the subject matter covered by such opinions, statements, posts, declarations;
-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 in charge with the organisation and management of communication activities,
(ii) providers involved in the management of social media accounts,
(iii) providers involved in marketing, advertising activities, managing newsletters, managing statistics and media services,
(iv) providers of cloud/data hosting services,
(v) providers of website related services,
(vi) providers enabling Us to manage our contracting process,
(vii) providers ensuring the security of our premises,
(viii) providers enabling Us to provide you with working tools, etc.

2/ partners of ESA, in relation to ESA activities and programmes and, generally, in relation to ESA mission as foreseen in ESA Convention, whether they are individuals, companies, investors, education institutions, research organisations or other legal entity;

3/ 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;

4/ other third parties interacting with ESA under a specific framework.

These third-party recipients are generally situated in the European Union, the European Economic Area or in countries that offer an adequate level of protection equivalent to that offered within the European Union and the European Economic Area (e.g. Argentina, Canada, Japan, Switzerland, United-Kingdom).

When the third-party data recipients are located in a country or international organisation not offering an adequate level of protection (e.g., Australia, United States, etc.), we take necessary measures to safeguard your data, in line with the conditions set forth in ESA PDP framework.

Additionally, we may utilise services provided by IT providers or integrate social media features into our platforms. In such instances, these IT providers or social media platforms may provide links to their respective websites, where they conduct their own data processing activities. It is entirely at your discretion whether you choose to access and utilise these social media features, depending on the terms and conditions applicable to each platform. If you prefer not to engage with social media or not to accept their terms and conditions, you have the option to refrain from accessing or using these platforms. Your decision regarding social media usage is within your control.

In case of transfer of personal data to the United States or other countries not offering an adequate level of protection, transfer may expose You to certain risks, particularly the risk of profiling, the risk that the applicable legal framework may allow further processing of the personal data and that any given consent may not be withdrawn.

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.).

- Voice recording: deleted immediately after transcription or within a short defined period.
- Chat history: retained for a defined business need.
- Security logs: retained according to esait security and retention policies.
- Personalization profiles: deleted after inactivity or account closure.

(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) ***ESA Contractors***

ESA may enter into contracts with various contractors who, with regard to Your Personal Data and depending on the contract concluded with ESA, may act either as a separate Data Controller or as a Data Processor.

- To the extent such contractor act as a separate Data Controller, the separate privacy notice of the contractor will apply for the purposes of collection and processing decided by the contractor.
- To the extent such contractor act as a Data Processor, this privacy notice applies for the purposes of collection and processing decided by ESA.