

D4.4 Data management plan and ethics

WP4, T4.3

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Technical references

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Acronym or Abbreviation	Complete word
D	Deliverable
DoA	Description of Action
EU	European Union
T	Task
WP	Work Package
PC	Project Coordinator
DMP	Data Management Plan
DOI	Digital Object Identification



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GDPR	General Data Protection Regulation
DPO	Data Protection Officer
IP	Intellectual Property
APRE	Agenzia per la Promozione della Ricerca Europea
EBN	European Business and innovation centre Network aisbl
ICONS	Fondazione ICONS
EurA	3URA Unipessoal Ida



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Executive summary

The current deliverable, entitled 'Data Management Plan and Ethics' (DMPE), was developed within the framework of the EIC Communities project which is funded by the European Union's Horizon Europe Research and Innovation Programme under Grant Agreement N. 101105050.

This deliverable describes the data management life cycle for the data to be collected, processed and/or generated by the project. As part of making research data findable, accessible, interoperable, and re-usable (FAIR), the Data Management Plan (DMP) provides a summary of the main elements that should be considered in the definition of the data management policy to be used by the project partners throughout the project activities. The DMP provides indications about the management of all the data generated during the project activities, including how data will be collected, managed, stored and made available during the project and how they will be shared after the project end.

In addition, the deliverable describes data processing procedures used by the EIC Communities consortium, applicable legislation as well as includes informed consent template that will be used during project implementation. The information contained in this document will represent a key point of reference for all project activities that will involve humans, such as the participants in all project events (workshops, webinars, meetings, etc.), and/or in interviews etc. (online and in person) run by the project. The document contains also information about compliance with EU and national data protection rules under GDPR, of each EIC Communities Beneficiary.



1. Introduction

1.1. Background and aim

The EIC has united and is curating a wide range of deep tech projects and entrepreneurs with more than 5,500 quality stamped companies, 408 innovation-driven research teams and 800 innovations, and more than 2,800 corporates, investors, procurers and many more business intermediaries and market experts (EIC Pilot Impact Report 2021).

Whilst EIC is supporting the creation of emerging and disruptive technologies, it is also concerned with supporting human talent and bringing their technologies to the market. This involves ensuring there are the conditions for deep-tech entrepreneurs and innovators to transform their technologies into higher TRLs, such as financial and innovation management support. Considering the latter, interactions between and community building around EIC thematic and EIC Challenge-driven portfolios are of paramount importance for the functioning of the overall EIC ecosystem as they represent a further level of cross-fertilisation and accelerate the achievement of innovation and exploitation objectives of the EIC projects. Building inclusive communities and synergies between EIC portfolios is also necessary to manage the complexity of the high-risk nature of EIC research as it offers the possibility to enlarge multidisciplinary collaborations. The approach to building thematic EIC communities around portfolios with existing and new members thus can demonstrate focused directives for fostering radical and deep tech innovation. The role of EIC Programme Managers (EIC PMs) is envisioned in this system to promote and curate the aforementioned talents and support the development of technologies to potential innovations “through spin-outs, IPRs, collaborations and other pathways” (EIC Pilot Impact Report 2021). Creating diverse and inclusive communities around portfolios is therefore crucial for facilitating the proactive management of portfolios by EIC PMs, as its goal is to remain flexible and reactive in the global scientific and industrial community.

Therefore, EIC Communities main objective is to increase the visibility and impact of EIC portfolios of projects through the co-creation of diverse online and physical activities, materials and tools that will be implemented in the project three thematic Communities of Practice (CoP) – cleantech, industry and health. Those formats will prompt the creation of multidisciplinary communities around selected portfolios and will stimulate interactions and synergies among projects inside and across thematic and EIC challenge-driven portfolios, while providing the EIC PMs with sustainable measures and community model structures to build networks around portfolios. In turn, those actions will nurture new visions for future technologies and innovation breakthroughs, resulting in a set of policy recommendations for future deep-tech.

The main EIC Communities objective will be accomplished through the achievement of the following Specific Objectives (SOs):

- SO1: To facilitate and promote an active intermediary role of PMs and other EIC representatives within the EIC portfolio ecosystem by involving them in EIC Communities decision making and co-creation activities
- SO2: To build multidisciplinary and inclusive communities around the selected portfolios by creating three thematic Communities of Practice (CoP) composed of stakeholders beyond the beneficiaries of portfolio projects



- SO3: To encourage networking and exchanges between projects within thematic portfolios and stimulate interactions across the selected EIC portfolios
- SO4: To support co-design of visions for future technologies and innovation breakthroughs and contribute to steering strategic decisions and directions for the European R&I and deep-tech.
- SO5: To produce diverse communication and dissemination materials and tools that will maximise the visibility and impact of EIC portfolios and ensure uptake of their results by the relevant actors.

The project involves 4 partners:

- AGENZIA PER LA PROMOZIONE DELLA RICERCA EUROPEA (APRE);
- FONDAZIONE ICONS (ICONS);
- EUROPEAN BUSINESS AND INNOVATION CENTRE NETWORK AISBL (EBN);
- 3URA UNIPESOAL LDA (EurA).

1.2. Aim and structure

This Deliverable describes the processes for an effective data management plan, it is therefore structured around two main themes:

- ✓ DATA MANAGEMENT (chapter 2)
- ✓ ETHICS AND PERSONAL DATA PROTECTION (chapter 3)

Chapter **2** describes the data management life cycle for the data to be collected, processed and/or generated by the EIC Communities consortium. It will define the main elements to be used by the project partners during the project to make research data findable, accessible, interoperable and reusable (FAIR). As part of this, this chapter constitutes the project **Data Management Plan (DMP)** and provides indications about the management of all data generated during the project activities, including how data will be collected, managed, stored and made available during the project and how they will be shared after the project ends.

The Chapter **3** describes the application of the European Union's General Data Protection Regulation (GDPR) to guarantee a coherent approach towards data protection and privacy issues during EIC Communities activities implementation, despite the various differences across the EU Member States legal frameworks. To confirm compliance with EU and national data protection rules under GDPR, each EIC Communities Beneficiary signed a '**Declaration on Horizon Europe Ethical Standards and Data protection**' (Appendix 1); when a Beneficiary was required to appoint a Data Protection Officers (DPO), his/her contact details are reported in the document (Appendix 2).

The 'Data Management Plan and Ethics' (DMPE) is a living document and it will be updated during project implementation according to project's needs and in case significant changes arise (e.g. new datasets, changes in consortium policies about data and quality management, changes in consortium composition, and so on). In any case a revision will be made in M12 and in M30. Evidence of these changes (if any) will be provided in the periodic evaluation/assessment of the project (period reports).



2. Data management plan

2.1. Data Management in EIC Communities – overview

2.1.1. Objectives and structure of the Data Management Plan

Chapter 2 of this deliverable aims to describe the overall data management process within EIC Communities, in particular which data are generated and how they will be collected, managed, processed, stored and made available during the life of the project, as well as how they will be preserved and shared beyond. This is an important aspect of any research project and therefore it is essential to plan an effective data management since the early stages.

EIC Communities involves the collaboration of 4 beneficiaries and a moderate amount of data will be generated in various activities. All data collected and generated during the project will be managed according to the FAIR principles in order to be findable, accessible, interoperable and reusable.

A good DMP can reduce the risk of data loss or other threats that could make the data unreadable or unusable and can guarantee their accessibility and preservation in the long term. Good data management also increases the knowledge discovery and innovation, as the data are re-used by the community after their publication process¹.

The management of data generated during the project will aim to ensure open access, as stated in Article 14 of the Grant Agreement, taking into account the principle of "*as open as possible, as closed as necessary*", in order to ensure the adoption of appropriate measures to preserve project results that can be further exploited in the future. Thus, the project will pursue a balance between openness and protection of information, commercialisation and Intellectual Property Rights (IPR), privacy concerns, security, etc. If project partners need to keep certain parts of their data closed, this choice will be explicitly indicated in this DMP.

The EIC Communities Data Management Plan and Ethics (DMPE) specifically:

- provides an overview of the data that will be collected and processed in each Task (see § 2.3), where data management is required;
- describes (see § 2.4) where and how the data generated by the project activities will be stored (information about the IT infrastructure used will be also provided);
- details how data will be documented to ensure that new members of the EIC Communities team and/or any possible (secondary) users are able to understand and reuse the data (see § 2.5);
- describes the level of data confidentiality and the responsibility of the individual organisations, within EIC Communities, involved in the data collection processes (see § 2.6);

¹ Wilkinson, M., Dumontier, M., Aalbersberg, I. et al. The FAIR Guiding Principles for scientific data management and stewardship. Sci Data 3, 160018 (2016). <https://doi.org/10.1038/sdata.2016.18>.



- describes how the data will be shared (see § 2.7) and where they will be deposited for preserving all the material produced (see § 2.8);

2.1.2. Data management during EIC Communities lifetime

APRE, as project coordinator, will be responsible for coordinating the data management with the active support of WP Leaders and Task Leaders. The partner responsible for the generation of data in the task in question will also be responsible for the securing of the data for release via open access repositories when these are open.

During the progress of the project implementation and when the final results are achieved, if needed, the content of the DMPE will be enriched. Therefore, this deliverable will be updated if new project needs arise affecting data management. Evidence of the updates will be provided in the reporting documents.

Having in mind the data management purposes, and that the data generated will be useful, findable and reusable over the long-term for the end-users, the long-term storage of EIC Communities data will be guaranteed through a dedicated [ZENODO](#) repository², which will also avoid the risk of data loss.

The data stored on ZENODO will automatically have a persistent identifier, namely a DOI, to datasets to allow easy citation and discoverability. ZENODO offers free data archiving up to 50 GB per dataset, which is sufficient, given the expected data volume in the EIC Communities project.

2.2. Data Collection

2.2.1. Data information

During the EIC Communities project, various types of data will be collected and documented.

This section describes the data that will be collected in each Task (if applicable), as indicated by the Task Leaders.

Type of Data

In research projects, usually different types of data (observational, experimental, simulation, derived or compiled, reference or canonical and event related) may be collected and documented. Since EIC Communities is a Coordination and Support Action, no experimental data will be collected. However, the following categories of data will be collected:

- ✓ **Technical Data:** recorded information related to technical activities (e.g. analysis of existing practices, development of new solutions, mapping of relevant initiatives/projects, etc.). The collection may require surveys, interviews, instruments to record, transformation of existing datasets to create new data, etc.
- ✓ **Stakeholders Data:** such as Contact Details or any other (personal) data of EIC Communities stakeholders and projects selected by PMs. The collection may involve

² <https://zenodo.org/communities/101105050/records?q=&l=list&p=1&s=10&sort=newest>



registration forms to events, newsletter subscription, website, etc. The handling of those data will take into account the GDPR.

It is worth to point out that administrative/financial data (data strictly related to the management of the project, e.g. meeting minutes, collection of information about partners' expenditures, etc.) is not included in the technical data definition, and in EIC Communities project it will be considered 'other data'. Moreover, the identified categories can occasionally overlap, and data can belong to more than one category depending on the specificities of the data itself.

Format of the data and estimated size

Collected data come in various formats: electronic text, spreadsheets, multimedia, models, software languages, etc. For the concerned Task, it will be described the format of the data produced, with the ultimate goal of facilitating the accessibility and interoperability of the data, giving preferences to open and standard formats. In this deliverable, a first estimation of the size of the data collected in each Task will also be provided. This information will be updated (if needed) in the final version of EIC Communities DMPE according to the actual size of data collected.

2.2.2. Organisation of data collected

The data collected within EIC Communities will be organised taking into consideration the following aspects, as far as applicable:

Version Control

To overcome the challenge of managing and tracking research materials during the course of a project, especially in collaborative projects, data will be organised to keep track of different versions of the datasets, through the application of a version control system. A version control system (or revision control system) is a system that tracks incremental versions (or revisions) of files and, in some cases, directories over time (such as v0.1, v0.2 etc.). Improving the ability to consistently track and retrieve each version of a file can lead to more efficient collaboration and increased accuracy of research results. Through the version control system, the risk of losing information after modifications is minimised.

Versioning is important for long-term research of data management where metadata and/or files are updated over time.

Naming conventions used

With the overall aim to make the data accessible (and ultimately foster reproducible research), EIC Communities datasets will be carefully named by choosing file names that are informative and useful for both humans and machines. The name should be meaningful to allow others to better understand what the file contains and how it should be used. Following, there are some suggestions about the naming conventions within EIC Communities:



Choose machine readable names

Use deliberate delimits. Common approach is using “_” and “-” to delimit units of metadata in the file names. A general rule could be to use “-” to separate words you want to glob together and “_” to separate different information within a file name. Don’t use spaces, punctuation, capital letters or special characters (Using \$, @, %, #, &, *, (,), !, etc. may have meanings in programming languages).

Choose human readable names

Choose names that explain the content. The more meaningful the name, the more useful it is for human users. The more metadata you store in the name, the less you need to explain elsewhere. Choose short names.

An example can be: stakeholders_survey_10feb2024

2.3. Data collected in EIC Communities Tasks

The first version of the EIC Communities DMPE mapped 7 datasets whose key details are summarised in Table 1.

This section’s first development and future updates mainly rely on the collection of information about datasets filled out by each project partner responsible for producing such data as Task Leader. The coordinator drafts a form to collect this information (word form, see Appendix 1) and shared it in the Project SharePoint. For each Task in which the consortium foresees data management, the Task leader has to track this primary information on the data that will be collected: data summary, standards/formats used, data accessibility and findability, data archiving and presentation and data interoperability.

The form will be updated when needed and in case a new dataset will be defined.



Table 1 summary EIC Communities datasets

Dataset name	Partner	Source	Size	Task	Accessibility
Stakeholders database	All	Partners' mapping	In progress	T1.2	Public, online
Projects' database	All	PM's proposed projects	145 projects	T1.2	Public, online
Community Building Workshop Registration Form	All	PM's proposed projects	At least 150 stakeholders, 50 per CoP	T2.2	Private
Co-Creation workshop Brussels Out 2023 – Needs Assessment	All	PMs projects, portfolio areas, needs	6 answers	T1.1	Private
Follow-up survey Co-Creation Workshop	All	PMs projects identification, SWOT analyses	5 answers	T1.1	Private
Declaration of consent – Co-Creation Workshop Brussels Out 2023	All	Attendance and collection of photos in the venue	18 attendees	T1.1	Private
Stakeholders Info Session	EBN	EBN members	65 answers	T2.2	Private



2.4. Data storage and backup

With the aim to follow the FAIR principles and to stimulate the collaboration among partners, a data storage tools has been selected. The selection was made having in mind the purposes and the end-users of the data stored.

EIC Communities storage tool used to carry out daily project activities (NOT appropriate for long-term storing of data):

- ✓ **Microsoft SharePoint:** is a file hosting service and synchronisation service operated by Microsoft as part of its web version of Office. It is a private space, created for the project activities, used by all beneficiaries to share working files and store temporary master copy of raw data that should be available for use by other beneficiaries for data processing. EIC Communities storage tool used for long-term storing of data and to guarantee the findability, accessibility, interoperability, and reusability of data generated by project, is **the EIC Communities community in ZENODO:** where EIC Communities datasets will be stored.

Link: <https://zenodo.org/communities/101105050/records?q=&l=list&p=1&s=10&sort=newest>

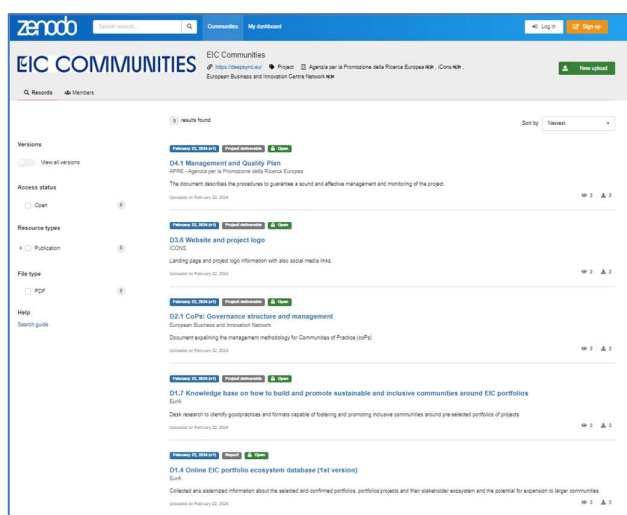


Figure 1 Zenodo page

Data files are versioned. The uploaded data is archived as a Submission Information Package. Derivatives of data files are generated, but original content is never modified. All data files are stored in CERN Data Centres, primarily Geneva, with replicas in Budapest. Data files are kept in multiple replicas in a distributed file system, which is backed up to tape on a nightly basis. All data files are stored along with a MD5 checksum of the file content. Files are regularly checked against their checksums to assure that file content remains constant. Each beneficiary has the possibility to upload the data produced by their project activities in the community and a moderator will validate it. Each data-set will have a readme file. ZENODO is compliant with the Open Archives Initiative Protocol for Metadata Harvesting (OAI-PMH), a widely used protocol for harvesting metadata.



2.5. Data Findable

All data are documented to help interested users to clearly find them and reuse them. For this reason, descriptive and substantive (i.e. how the data should be read or interpreted) metadata will be elaborated and described in a “readme.txt” file complementing each dataset (see Table 2).

Table 2 Metadata included in the readme file of EIC Communities data

Creator*	Main partner name involved in producing the data.
Title*	Name or title by which the dataset is known.
Contributor	Institution where the data was created or collected. A person or organisation responsible for making contributions to the dataset.
Publisher	A holder of the data (including archives appropriate) or institution which submitted the work. Any others may be listed as contributors.
Publication year*	The year when the data was or will be made publicly available.
Date created*	Date the resource itself was put together; this could be a date range or a single date.
Description*	Concise description of the contents of the dataset. Describe the research objective, type of research, method of data collection and type of data.
Subject	Subject, keyword, or key phrase describing the resource.
Temporal coverage	Indicate the dates to which the data refer. Enter the year or beginning and ending dates.
Spatial coverage	Describe the geographic area to which the data refer (e.g. municipality, town/city, region, country). The geographic coordinates of the area may be included, if desired.
Identifier	Zenodo automatically assigns a DOI to a dataset once the entire deposit procedure has been completed. In some cases, a dataset may be known by one or more other (persistent) identifiers.
Language*	The primary language of the resource.
Link to publication	Include the web addresses or DOIs for any publication, important internal reports or other datasets that are related to your dataset.

File naming & Identifiers

In EIC Communities project, an identifier is used as a reference number or name for a data object. The identifier is a key part of our documentation and metadata. Table 3 shows the codes that can be used for making identifiers.



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Table 3 Examples of files identification

Description	Deliverables	Meetings	Conferences/Events
First Letters	EIC Communities	EIC Communities	EIC Communities
Underscore	—	—	—
Next letters	Deliverable number (Dx.y) [x=WP number, y=deliverable number]	Type of document (i.e. Agenda, Minutes, Presentation). In case of presentations, mention WP number as well.	Event title
Underscore	—	—	—
Next letters	Short explanatory title for the document (or acronym)	Location and date of the meeting separated by underscore	Location and date of the meeting separated by underscore
Underscore	—	—	—
Next letters	Short name of organisation leading the deliverable	Short name of organisation and initials of presenter	Short name of organisation and initials of presenter
Underscore	—	—	—
Last letters	"v" and number of revision of this specific report [v0.1=draft version, v1.0=final version]	"v" and number of revision of this specific report [v0.1=draft version, v1.0=final version]	"v" and number of revision of this specific report [v0.1=draft version, v1.0=final version]



2.6. Data Accessible

The main part of raw and processed data generated by the project will be accessible to all consortium partners. It will be stored in EIC Communities SharePoint dedicated space. Only members of the consortium, after validation from the group administrator (APRE), can access this space. The public data will be accessible by ZENODO Community.

The data containing personal data and the data gathered through questionnaires, interviews, focus groups, workshops and through other data gathering methods used during the project will be anonymised by default; for the purposes of the project's activities (specifically stakeholders engagement related activities, as a crucial element of the project), with prior expressed consent to share personal data, they will be used and will not be made accessible for any third party.

Raw data like interview and audio files will be shared within the consortium partners and with external open repositories only upon agreement of the participants (agreement via informed consent) and in an anonymised form. In the case of sharing the data in an open repository, the following formats would be shared: audio files, transcripts, aggregated files, interview guidelines.

Confidential data and data collected for internal purposes will be stored in the secure facilities of the organisation responsible for collecting the data and will be retained for two years after the end of the project. If requested and agreed by the participants, data can be shared with other consortium members through the online repository.

In the case of data that cannot be accessible to the public, it will be stored in ZENODO (to preserve it) but only the metadata will be public (in CC 0).

Details concerning the ownership, transfer and dissemination of projects results are defined in section 8 of the EIC Communities Consortium Agreement and shall be followed accordingly. The relevant rules of the Grant Agreement, in specific Article 13, Article 15, Article 16 and Annex 5, are also relevant and apply accordingly.

2.7. Data sharing and reuse

EIC Communities beneficiaries will be the main users of data produced in the project. In EIC Communities all data may be classified into open, sensitive and closed. Access depends on the classification of the data.

- ✓ **Open data** is applied when data have no IP restrictions and will be openly available and re-usable, acknowledged by citing the data set. This is the case of the data in the Public deliverables.
- ✓ **Sensitive** (or confidential/restricted) **data** may be made available after any identifying information has been removed.
- ✓ **Closed data** are not available for sharing.

Details concerning the ownership, transfer and dissemination of projects results are defined in section 8 of the EIC Communities Consortium Agreement and shall be followed



accordingly. The relevant rules of the Grant Agreement, in specific Article 13, Article 15, Article 16 and Annex 5, are also relevant and apply accordingly.

2.8. Data preservation and archiving

All relevant obtained data will be preserved and archived in ZENODO for long term archiving. All data and items on ZENODO will be retained for the lifetime of the repository. This is currently the lifetime of the host laboratory CERN, which currently has an experimental programme defined for the next 20 years at least.



3. Ethics and personal data protection

3.1. Applicable legal framework

The European Union has developed the EU Data Protection and Privacy legal framework³ which aims ensuring that personal data enjoy a high standard of protection everywhere in the EU and that persons or organisations collecting and managing personal information must protect it from misuse. One of the main pillars of this legal framework is Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data - GDPR. The Regulation applies to all entities established in the EU (or branches established in the EU) that process personal data as part of their activities, regardless of where the data is processed; and entities established outside the EU offering goods/services to individuals in the EU or monitoring the behaviour in the EU of these individuals.

In addition to GDPR, there are other sectorial legal acts that must be considered when implementing EU research projects:

- Directive 2000/31/EC of the European Parliament and of the Council of 8 June 2000 on certain legal aspects of information society services, in particular electronic commerce in the Internal Market,
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector.

In this framework, with regards to personal data in the context of project implementation, the EIC Communities consortium (as whole as well as each single Beneficiary) guarantees that privacy data will be treated in compliance with ethical and legal requirements, with the data protection principles of lawfulness, fairness and transparency in data processing, as well as purpose limitation, data minimisation, accuracy, storage limitation, integrity and confidentiality, and fully agrees that the protection of personal data is a priority.

For this purpose, the project consortium defined data protection roles and responsibilities and provides information and informed consent for data processing. In particular, Beneficiary will request informed consent to disseminate such data for activities and co-creation purposes. At the same time, informed consent can never legitimise the use of data in an open access environment considering that the purposes for further use of data are unknown. In such cases, data will be kept confidential. Last but not least, no transfer of personal data outside the EU is foreseen as part of the project's implementation.

³ https://ec.europa.eu/info/law/law-topic/data-protection_en



3.2. Principle of personal data processing

According to Art. 4(1) of GDPR, personal data ‘means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person’. Personal data protection typically covers: names and surnames, home and email address, an identification card number, location data and IP address or a cookie ID. Processing of personal data is defined in Art. 4(2) of the Regulation and means ‘any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction’.

In its Art. 5, the GDPR provides for the principles of personal data processing, stating that personal data must be:

- ‘processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (...) (‘purpose limitation’);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed (...) (‘storage limitation’);
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

In order to fulfill the GDPR requirements, there is a set of indications that each EIC Communities Beneficiary dealing with data processing will respect during the project implementation:

1) Consent

The consent should be given by an individual (data subject) in a free, specific, informed and unambiguous manner, by way of a request presented in clear and plain language. Moreover, the consent should be given by an affirmative act, such as checking a box online or signing a form.



2) Providing transparent information

Individuals must be clearly informed on who is processing their personal data as well as what data will be processed, why and how. In addition to the above information, individuals should be also informed about who will receive the data, how long the data will be stored, the individual's data protection rights (i.e. right to access, correct, erase, restrict, object, portability, etc.), whether there is a statutory or contractual obligation to provide the data and how consent can be withdrawn.

3) Ensuring the right to access and the right to data portability

Individuals must have the right to request access to their personal data, free of charge and in an accessible format. In addition, when the processing is based on consent or a contract, the individual can ask for their personal data to be returned or transmitted to another company (right to portability).

4) Ensuring the right to erasure (right to be forgotten)

An individual has the right to request the data controller to erase their personal data, such as when the data is no longer needed to fulfil the processing purpose. The data controller is not obliged to comply with such request if: the processing is necessary to respect one's freedom of expression and information, they must keep the personal data to comply with a legal obligation; there are other reasons of public interest to keep the personal data, such as public health or scientific and historical research purposes; they need to keep the personal data to establish a legal claim.

5) Ensuring the right to correct and right to object

If an individual thinks that their personal data is incorrect, incomplete or inaccurate, they have the right to have it rectified or completed without undue delay

6) Obligation to appoint a Data Protection Officer

An entity must appoint a DPO when: it regularly or systematically monitors individuals or process special categories of data; this processing is a core business activity; and it does it on a large scale. In the case of EIC Communities, Beneficiaries provided to the Coordinator declarations on the basis of the letter template in Appendix 2 (if they do not have a DPO) or on the basis of the template in Appendix 3 (if they appointed a DPO).

7) Obligation of data protection by design and by default

In order to minimise privacy risks and increase trust, a data controller⁴ must take all necessary steps (e.g. pseudonymization) to implement the data protection principles and protect the rights of individuals (data protection by design). In accordance with the obligation of data protection by default, the entity processing personal data should ensure that the most privacy friendly setting is the default setting.

8) Obligation to provide proper notification in the case of a data breach

⁴ According to Art. 4(7) GDPR, 'controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.



In case a data breach occurs and the breach poses a risk to individual rights and freedoms, the entity processing personal data should notify the relevant Data Protection Authority within 72 hours after becoming aware of the breach. If the data breach poses a high risk to those affected, the entity may also be required to inform all individuals affected by the data breach.

Details on specific measures that will be taken by each EIC Communities Beneficiary to safeguard the rights and freedoms of EIC Communities data subjects/research participants and the security measures that will be implemented to prevent unauthorized access to their personal data are provided in Appendix 1 in the 'Declaration on Horizon Europe Ethical Standards and Data protection' of each Beneficiary, in the part related to the privacy policy of the Beneficiary.

Informed consent procedure⁵

Participation of third parties in the EIC Communities project is voluntary and individual participants agree to participate in project activities (both online and physical) based on the invitation issued. Along with an invitation, participants receive an informed consent and agree to participate, before the commencement of any project activity requiring their involvement, in compliance with GDPR.

The documentation related to informed consent will be provided in the language and terms intelligible to the participants. To this end, before each event involving participants, they will be asked to sign an informed consent and will be fully briefed, in the informed consent, as to their data protection rights, including:

who is responsible for the treatment of data;

who is the data protection officer to whom the participant can claim their rights;

specification of which data are collecting (personal data or other);

how the consortium will deal with the data (collection, storage, etc.);

for which purpose data (research and no other purpose; explicitly excluding commercial purpose) are collecting,

what are the consequences of the denial of the use of data;

the possibility to withdraw from the use of data and the consequences;

to whom data will be transmitted;

the time of storage of data;

the place of storage and the tools available to guarantee security;

the rights of the data owner (to access, modify, rectify, cancel data, right to object, and to ask restriction of processing);

risks or benefits of participation.

⁵ Privacy policy: <https://deepsync.eu/privacy-policy/>



Participants will not be placed in any situation in which there is a likelihood of physical, mental, or emotional harm. No sensitive data⁶ will be collected, processed, or stored.

Below and example of the sentence that the partner organising the event and responsible for collecting the personal data, will insert in the informed consent in the proper Language:

“Your personal information, including your name and email address, will not be used by EIC Communities to identify you and will not be made available publicly. Your personal information, including your name and email address, will be used to communicate with you about EIC Communities objectives and activities EIC Communities will not sell, rent or exchange any personal information supplied by you to any third party. Your personal information will only be used for EIC Communities purposes and only until the end of the project (28 February 2026), and stored on by a hosting & cloud service provider. By filling in this form, you agree to the use of your image (video and photos) for EIC Communities reporting and promotional purposes, in the context of European Commission obligations regarding reports and Dissemination activities (Grant Agreement, art.17 “Communication, dissemination and visibility” and art.21 “Reporting”). *Your name displayed during online meetings may be showcased in promotional materials and reporting. If you wish for this data to remain anonymous, please change the displayed name. In addition, you may turn off your camera if you do not wish your image to be displayed.

EIC Communities privacy policy available: <https://deepsync.eu/privacy-policy/>

For any inquiries reach out to us via emailinfo@eicommunities.eu

3.3. Data processing

The data processed in EIC Communities is divided into two categories:

- ✓ Personal data (typically name, surname, date of birth, gender, level of education, professional affiliation and contact information);
- ✓ Professional views on the themes related to the project and discussed during project activities, excluding sensitive data.

Personal data is necessary for ensuring a person’s participation in the project and to comply with mandatory legal obligations under European Union legislation, as well as for processing under consent and for the purposes of legitimate interests as follows:

- ✓ To process any application a person makes to participate in any of the EIC Communities events or activities;
- ✓ To process any request for information supplied by the project and to ensure effective communication;
- ✓ To organise and promote project events and activities;
- ✓ To send health and safety and other relevant event information for any EIC Communities events and activities that persons are participating in;

⁶ Data relating to racial or ethnic origin, religious or philosophical beliefs, political opinion, health including biometric and genetic data, sexual preferences, data relating to criminal convictions and offences or related security measures.



- ✓ To notify persons of events, activities, publications, and services that may be of interest to them.

Information about professional views on the themes related to the project will be collected solely for research purposes necessary to carry out project activities.

The above data collected from participants will be stored on computer media of the consortium partner collecting this data (typically, a partner organising a given activity) and protected against unauthorised access and use according to the internal rules of the respective partner, which must be in line with applicable EU and national legislation. Personal data of participants to EIC Communities events will be shared with other consortium partners by the partner collecting this data only under explicit consent of each participant.

Where possible, any identifiable information will be encrypted or minimised. That means that only strictly necessary data will be collected, processed, and stored.

The consortium will retain the collected data for as long as it is necessary:

- To carry out EIC Communities events and activities;
- For establishment or defence of legal claims that could be made against the consortium;
- To comply with legal obligations under EU law.

Any data collected within the project will be kept for a maximum of five years after the end of the project and will then be destroyed by each project partner in relation to the data they processed during the project duration. More information about data management is included in this deliverable in Chapter 2 'Data Management Plan'.

3.4. EIC Communities website: Deepsync

For the purposes of the GDPR, EIC Communities website dedicates a specific area to the 'Privacy Policy'. The privacy policy comprises the following sections:

1. Policy scope
2. Why and how is ensure compliance with
3. Who must comply
4. What are the data protection principles and rules
5. Personal data collected and how are used them
6. Cookies and third parties
7. How personal data is stored
8. How long personal data are kept
9. Rights as data subjects with respect to per personal data
10. Time limit



- 11. Data controller and contact details
- 12. How to complain
- 13. Changes to privacy policy information

3.5. Join controller Agreement

Where necessary, the Beneficiaries agreed (art. 4. Point 4 of the Consortium Agreement) to cooperate in order to enable one another to fulfil legal obligations arising under applicable data protection laws (the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and relevant national data protection law applicable to said Party) within the scope of the performance and administration of the Project.

In particular, the Beneficiaries shall, where necessary, conclude a separate data processing, data sharing and/or joint controller agreement before any data processing or data sharing takes place.



4. APPENDIX 1 DATASET COLLECTION

Task Name

Data summary	
Dataset description	<i>What is the content of the dataset processed in the task?</i>
Source	<i>Where the data is/will be derived from?</i>
Name	
Data exploitation	<i>For what purpose is the data collected? What is the use of data collection/processing?</i>
Data Type	
Partners responsibilities	
Partner in charge of the data collection	
Partner in charge of the data analysis	
Partner in charge of the data storage	
Partner that owns the data	
Partner that has the administrative responsibility of the data	
Standards	
Data format	



Does the format change from the original to the processed/final data?	
Size of data	
Software tools used for creating/processing/visualising data	
Data accessibility and findability	
Open availability of produced data	<i>What is the data access policy / dissemination level:</i>
How will data be made accessible	
Methods or software tools needed to access the data	
Data archiving and preservation	
Data preservation time	<i>For how long will the data be preserved?</i> <i>EIC Communities duration, 5 years beyond the EIC Communities duration</i>
Storage and backup strategy	<i>What are the tools/software/platforms/methods used to store the data? Where the data will be stored?</i>
Data interoperability	
Interoperability of data produced	<i>Will you make use of established software and hardware? If not, how does the software and hardware you use relate to other research?</i>
Will established vocabularies for datasets will be used or Standard ones	



5. APPENDIX 2 TEMPLATE FOR Declaration on Ethical STANDARDS and data protection (NO DPO)

Place and date

DECLARATION on Horizon Europe Ethical Standards and Data protection

I, the undersigned, representing Name of your organisation, with seat in Address of your organisation, hereby certify that Name of your organisation:

applies **ethical principles and guidelines** of Horizon Europe programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013,

applies **data protection rules** according to the Regulation (EU) [2016/679](#) of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - GDPR),

hereby confirm that Name of your organisation **does not designate a Data Protection Officer** because none of the criteria in Art. 37 sub. 1 of the General Data Protection Regulation (GDPR) are met in the case of Name of your organisation. Nevertheless, Name of your organisation has in place an internal regulation for personal data management and protection and related data privacy policy (see below) to safeguard the rights and freedoms of EIC Communities data subjects/research participants, and included a privacy working group in its organisation chart coordinated by XXX (name, surname and email address of the relevant person)

.....

Title and signature of the person signing the document



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the European Union

6. APPENDIX 3 TEMPLATE FOR Declaration on Ethical STANDARDS and data protection (with DPO)

Place and date

DECLARATION on Horizon Europe Ethical Standards and Data protection

I, the undersigned, representing **Name of your organisation**, with seat in **Address of your organisation**, hereby certify that **Name of your organisation**:

- applies **ethical principles and guidelines** of Horizon Europe programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013,
- applies data protection rules according to the Regulation (EU) 2016/679 of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).
- hereby confirm that **Name of your organisation** designated a Data Protection Officer: **Name and Surname of the DPO and his/her email address**
- hereby confirm that **Name of your organisation** has in place an internal regulation for personal data management and protection and related data privacy policy (see below) to safeguard the rights and freedoms of EIC Communities data subjects/research participants.



.....

Title and signature of the person signing the document



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