

D4.2 - Data Management Plan

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EC Project Officer	Enrico Pellizzari

	Name	Partner	Role
Responsible partner	Justine Thomas, Giovanni Lamanna	CNRS-LAPP	Coordinator, WP4 Co-lead
Contributor 1	Jordi Bodera	ESRF	WP1 Co-lead
Contributor 2	Gary Saunders	EATRIS	WP1 Co-lead
Contributor 3	Paul Millar	DESY	WP2 Co-lead
Contributor 4	Sally Chambers	DARIAH	WP2 Co-lead
Contributor 5	Romain David	ERINHA	WP3 Co-lead
Contributor 6	Anca Heinola	FMI	WP3 Co-lead
Contributor 7	Friederike Schmidt-Tremmel	Trust-IT	WP4 Co-lead
Contributor 8	Nicoletta Carboni	CERIC	Communication lead





DELIVERABLE ABSTRACT

OSCARS Data Management Plan (DMP) is one of the main management documents. and gives an overview of the data handling during and after OSCARS' implementation. It provides information on creation, management, sharing, curation and preservation of the project data and the data usage for the implementation of all project activities.

OSCARS – Open Science Cluster Action for Research & Society, is a four-year project funded with ~25M EUR in the frame of the European Commission Horizon Europe call HORIZON-INFRA-2023-EOSC-01-01, under grant agreement no. 101129751. It brings together world-class European RIs in the ESFRI roadmap and beyond, with the ultimate goal of fostering the uptake of Open Science in Europe across scientific disciplines and communities.

TERMINOLOGY

Terminology/Acronym	Definition
AAI	Authentication and Authorisation Infrastructure
ссс	Community-based Competence Centre
CLOCC	Cluster Open science Competence Centres
CODAS	Composable Open Data and Analysis Services
Cluster Coordinators	Representatives of the clusters, initially coordinators of the cluster projects, after the end of the projects the elected chairs, directors or other representatives of the clusters
COSP	Cross-Cluster Open Science Projects
CRISE	Composable Research Infrastructure Services in EOSC
CVMFS	CernVM File System: https://cernvm.cern.ch/fs/; a service to deploy software in large, distributed computing infrastructures
Data Lake	Federated Data Management service for Open Science
DIOS	ESCAPE Data Infrastructure for Open Science
DMP	Data Management Plan



EC	European Commission
ENVRI-FAIR	Environmental Research Infrastructures Cluster
EOSC	European Open Science Cloud
EOSC-Life	Life sciences Research Infrastructures cluster
ERA	European Research Area
ESAP	ESFRI Science Analysis Platform
ESCAPE	European Science Cluster of Astronomy & Particle physics
ESFRI	European Strategy Forum on Research Infrastructures
EU	European Union
EVERSE	European Virtual Institute for Research Software Excellence
FAIR	Findable, Accessible, Interoperable, Reusable
GA	Grant Agreement
IEC	Independent Evaluation Committee
IPR	Intellectual Property Rights
KER	Key Exploitable Results
LS AAI	Life Sciences Authentication and authorisation infrastructure
LS RIs	European Life Sciences research infrastructures
MACC	MAnagement, Communication and open Calls
MoU	Memorandum of Understanding
NeXus	A common data format for neutron, X-ray, and muon science
O-EB	OSCARS Executive Board



O-GA	OSCARS General Assembly		
O-MST	OSCARS Management Support Team		
O-SCB	OSCARS Steering Board composed of the five Science Cluster Coordinators		
О-ТРРА	OSCARS Third-Party Project Agreements Open Science Cluster Action for Research & Society Open Science Projects		
OSCARS			
OSP			
OSPS	Open Science Projects and Services		
PaNOSC	Photon and Neutron Open Science Cloud		
PaNET	PaN vocabulary instrument techniques		
PaNOSC	Photon and Neutron Open Science Cloud		
PDF	Portable Document Format		
PI	Principal Investigator		
PMB	Project Management Board		
RI	Research infrastructure		
SSH	Social Sciences and Humanities		
SSHOC	Social Science and Humanities Open Cloud		
TDR	Trustworthy Digital Repository		
TEWE	Testing and Widening uptake TEWE		
ТРРА	Third Party Project Agreement		
VISA	PaN Virtual Research Environment		



VRE	Virtual Research Environment
WP	Work Package



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Executive summary

The Deliverable 4.2 Data Management Plan (DMP) provides a structured description of the data collected, created, and used for and by the OSCARS project. It also describes the procedures, policies and the data protection and preservation mechanisms used during the implementation of the OSCARS project and planned to be used in the post implementation period.

This document follows the structure of the Horizon 2020 and Horizon Europe DMP templates and outlines the key points regarding:

- purpose of the data collection in relation to OSCARS project objectives and activities,
- types and formats of OSCARS project data,
- reuse of existing data,
- origin of data and data usefulness,
- alignment with FAIR principles,
- resources needed and responsibilities within the project,
- data security,
- ethical and intellectual property aspects related to data.

The OSCARS Data Management Plan (DMP) delineates the comprehensive approach, criteria, and technical elements necessary to establish a robust and reliable data management system for the OSCARS project. It outlines the project's datasets, fundamental protocols for managing project data, and offers guidance to all members of the OSCARS project consortium.

OSCARS recognizes the following data handled throughout the project duration:

 Personal contact data, email lists: These are generally related to overall project management (i.e., information on project participants), but also include such information on the mailing lists related to other OSCARS community members, communication WP partners, etc. The form of these are typically databases, and spreadsheet documents.



- Project documents, i.e., deliverables, milestone reports, official or internal project documents, minutes and notes, etc.
- Survey: typically, spreadsheets of answers collected (application form, etc.) during the project runtime.
- Digital objects:
 - Video recordings: Zoom meetings, Online Webinars (Ask Me Anything Sessions, OSCARS Open Call Launch event, etc).
 - o Software: EVERSE, GitHub
- Documentation of software, services and examples for service usage, in the OSCARS Knowledge Base or other repositories. These can be RDF triples, documents (PDF, etc), or example scripts, workflows, notebooks etc.
- Websites: OSCARS website content, etc.
- All the information regarding the Open Calls: the proposals submitted and reviewed
 in the Grants platform, the evaluation reports from the reviewers, the list of the
 reviewers, the contracts signed between Trust-It and the reviewers, the contracts
 signed between the coordinating organisations of the successful proposals and CNRS
 and all related data needed to implement the projects, etc.

The OSCARS Data Management Plan is a living document and shall be updated continuously throughout the project in line with the new information gathered while conducting the project activities.



1. Introduction

1.1 OSCARS Project

OSCARS – Open Science Cluster Action for Research & Society, is a four-year project funded with about 25 million euros within the frame of the European Commission Horizon Europe call HORIZON-INFRA-2023-EOSC-01-01, under grant agreement no. 101129751¹. It brings together world-class European RIs in the ESFRI roadmap and beyond, with the ultimate goal of fostering the uptake of Open Science in Europe across scientific disciplines and communities.

All Science Clusters will keep working together in OSCARS to maintain the high-momentum achieved in the past years on FAIR data management and connecting research communities from all scientific domains to the EOSC.

The first objective is thus to consolidate the achievements of the Science Clusters into lasting interdisciplinary FAIR data services and working practices. Moreover, the project will lead and foster the involvement of a broad range of research communities in EOSC by launching two Open Calls (total worth about 16 million euros) for the development of new, innovative Open Science projects, that together will drive the uptake of FAIR, data-intensive research throughout the European Research Area (ERA). Projects can be proposed in the field of any of the Science Clusters and beyond, by any researcher or group of researchers, through a cascading grant mechanism. The first Open Call has been launched in March 2024.

To increase data FAIRness, OSCARS will also further develop a FAIR-compliant certification scheme for research data and community-based science platforms embedded in the EOSC portal. It will provide access to FAIR data services, data sources, guidelines and training and in addition, highly composable research-enabling services, as well as data processing and management solutions.

Furthermore, the concept of one Community-based Competence Centre (CCC) per Science Cluster is something new that will be deployed to leverage the specific achievements and competences of each cluster, addressing each scientific community's culture and needs, while at the same time strengthening intra-cluster collaboration by sharing best practices and jointly developing common strategies.

¹ https://doi.org/10.3030/101129751



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The implementation of the work has started based on a long-standing collaboration among all the clusters, whose role in the ERA will be further strengthened, recognised, acknowledged and sustained for the future. It is expected that, through OSCARS, the advances in organisational models, as well as in sharing digital technologies and services for the benefit of all domains, will be further strengthened, and that there will be a widespread uptake of multidisciplinary Open Science practices in the different research communities and beyond.

The achievement of those objectives will be supported through the collaboration with the Horizon Europe project EVERSE, which started in March 2024. EVERSE will create a framework for research software and code excellence, collaboratively designed and championed by the research communities, in pursuit of building a European network of Research Software Quality and setting the foundations of a future Virtual Institute for Research Software Excellence.

In summary, the Science Clusters will consolidate their role as thematic EU nodes for 'Open Research', and will establish and operate Competence Centres and virtual research environments fostering the alignment of practices in scientific data analysis.

1.2 OSCARS Work Plan

OSCARS activities are organised in four work packages:

WP1 – Cluster Open science Competence Centres (CLOCC)

The main objectives of WP1 are for each scientific cluster to establish a Community Competence Center (CCC) focused on a specific field, drawing on its own achievements and skills, taking into account the culture and needs of its scientific community.

WP2 – Composable Research Infrastructure Services in EOSC (CRISE)

The main challenge for the Science Clusters, and specifically for this WP, is to increase the data-driven scientific output across all domains through CODAS — Composable Open Data and Analysis Services.

WP3 – Testing and Widening uptake (TEWE)

Through WP3, OSCARS will join efforts within other existing EOSC projects, Task Forces and international fora, initiatives and Working Groups, to tailor platforms for hosting interdisciplinary science projects and to be a catalyst for CODAS building.



WP3 will develop a registry of stakeholders (targeting data steward activities at least), a dashboard and a series of actions in this respect, including the provision of training and coaching, to also ensure developed services are assessed against their usefulness, usability, functionality and performance, by users from various fields of science.

WP4 -Management, Communication and open Calls (MACC)

The WP4 is in charge of the overall management, administration, and communication strategy of the entire OSCARS project. It is dedicated to the publication and implementation of the OSCARS' Open Calls for Open Science projects and services through a cascading grant mechanism.



2. Data summary

All data produced as part of the management of the OSCARS project will comply with FAIR Data principles.

Work Package 1

The work of WP1 is essentially focused on the notion of Community Competence Center (CCC).

Accordingly, WP1 will implement the activities required to bring the five Science Clusters together around a common definition. Meetings, surveys, and questionnaires will be used to create this definition. The data generated by WP1 will be essentially scientific, as they will be working on a common definition of the notion of CCC. Some of the WP's activities will therefore focus on researching similar initiatives, and establishing a glossary and vocabulary that can be used. All material generated will be stored on the Google Drive space of the OSCARS project.

WP1 will have to deliver the following documents: D1.1 CCC first survey, D1.2 CCCs Functioning Report and D1.3 Events report.

Work Package 2

WP2 is dedicated to implementing the following vision: As part of a comprehensive CODAS, scientists are individually authenticated and authorised, have access to datasets, can select software from a catalogue, and have facilities to execute workflows. This enables them to publish research products such as publications, research data and research software.

A CODAS, which might refer to service catalogues, data hubs and analysis platforms, is the result of the composability of a series of fundamental services for a user-centric open data research process. By interpreting the needs of domain-based scientific communities, CODAS — which may be customised per domain, or per RI, and are conceived in cooperation with researchers and other experts — will allow exploiting a high level of composability of services and data federations, to conduct research in a FAIR and Open context.

To achieve this, WP2 will define "composability" that will be promulgated within the EOSC community through various means, including presentations at symposia.

WP2 will also generate a catalogue of services and data sources, across all the clusters, that will allow a fuller understanding of the merits of various possible consolidation activities. In



part, this catalogue will take input from existing sources, including cluster-specific catalogues and the EOSC Providers and Resources data-dump (doi:10.5281/zenodo.11109626).

Within the context of these catalogues, common vocabulary will be established for describing services and data sources, based on existing work in this area. Workshops will be organised to support discussion that allow developing the consolidation plans and help identify any places where cross-cluster synergies would be possible.

The work package will seek collaboration with similar EU-funded projects, to align activities and identify common areas to avoid duplicate effort and maximise uptake. Such projects include EOSC-Future and EVERSE.

Progress on this consolidation work will be monitored and the engagement with communities within the clusters will be supported through various means, including webinars, published materials, presentations at meetings, workshops sessions.

WP2 will hold internal meetings to organise and coordinate WP-specific activities. There will be minutes from these meetings, stored as a Google Docs, that capture attendance, agenda, discussions and conclusions, and assigned work.

Work Package 3

With OSCARS, the Science Clusters have the first opportunity to consolidate a functional collaborative work to conduct targeted inter-cluster tests of Open Science services.

Through WP3, OSCARS will join efforts within other existing EOSC projects, Task Forces and international fora, initiatives and Working Groups, to tailor platforms for hosting interdisciplinary science projects and to be a catalyst for CODAS building.

WP3 will develop a registry of stakeholders (targeting data steward activities at least), a dashboard and a series of actions in this respect, including the provision of training and coaching, to also ensure developed services are assessed against their usefulness, usability, functionality and performance, by users from various fields of science.

The data collected to help the WP3 to achieve its goals will be personal data and scientific data. The collection of the personal data follows the GDPR guidelines and will not be re-used for any other purposes. For the registry of stakeholders, and in a second phase for the dashboard, a data dictionary will contain a definition for each field considered as necessary by the OSCARS community.



The data collection process for the meetings organised under this work package (WP) will be thorough and multifaceted to ensure comprehensive documentation and utility. Meeting agendas will be created and shared using Google Docs, outlining discussion topics and the meeting structure. Detailed minutes will be recorded in Google Docs during each meeting to capture key discussions, decisions, and action items. Presentations and slides used during the meetings will be collected from presenters and stored in the project's shared drive. Meetings will be recorded via Zoom, and the recordings will be securely stored using encrypted cloud storage solutions such as Google Drive or Dropbox. Attendance will be logged using online forms, recording the names and affiliations of participants. To ensure privacy, any personal information collected, such as attendee lists, will be managed in accordance with relevant privacy regulations.

Post-meeting, summary reports will be generated to highlight the main outcomes and next steps. These reports, along with the other collected data, will be stored and shared appropriately. Action items and follow-up tasks identified during the meetings will be tracked to ensure accountability and timely completion.

Data related to the writing process of papers (e.g. personal data captured in a csv file) for example the LS_RI_CC Position paper and OSCAR teaser Paper outline V1: Temporary files such as paper management sheets and drafts will need to track activities performed by each author and include all affiliation information required by scientific journals. In compliance with GDPR, this information is retained solely for this purpose, and the owner has the right to modify or erase it at any time. Once the article is published, this information will become publicly available, as is standard practice in all journals, with the consent of each author.

Work Package 4

The communication and dissemination of the results of the funded Open Science Projects and Services, as well as the onboarding of their data and results in the EOSC, will be part of WP4's mission. Therefore, communication and dissemination plans to reach out to multiple scientific communities will be developed and implemented. These foresee the deployment of a mix of tools and channels, such as:the OSCARS website, the websites of the five Science Clusters, (), social media (Linkedin, X), project and partners' newsletters, graphic and audio-visual material, media articles and presentations, etc.

The ultimate goal is to demonstrate the uptake of Open Science and the use of EOSC resources by multiple research (academic and industrial) communities, which the OSCARS project intends to engage with. clear interfaces and close cooperation with all other WPs will be key.



Personal data of the subscribers to the project's newsletter, as well as of registrants to OSCARS organised events, will be collected and processed after having received their consent, in compliance with GDPR. Such consent will be necessary before sending them any direct communication, either via the Mailjet service used in the project, or via any other email application.

All personal data are collected and processed following the OSCARS' Privacy Policy and Terms of Use: https://www.oscars-project.eu/privacy-policy, which also includes the Cookie policy adopted for the OSCARS' website navigation.

The Open Calls, which will be targeting the user communities within and beyond the Science Clusters, will be organised in compliance with the EC's conditions for transparency, equal treatment, conflict of interest and confidentiality.

The PI submits a project proposal through a webform on the OSCARS grants' platform accessible via the OSCARS website. The applicant will have to provide personal data (PI name, e-mail, the organisation or institution he/she is affiliated with, the country where he/she is based), that will be collected and processed in compliance with GDPR and will not be re-used for any other purposes, other than those related to the Open Call project's implementation and management. Data will be saved in a CSV form as exported from the OSCARS grants platform and stored in the internal repository IN2P3 Box at CNRS.

The scientific data collected through the application (project description, duration, amount of funding) will help the Independent Evaluator Committee to select the projects to be funded. The Evaluators will be chosen by the Science Clusters' representative whose expertise matches the subject of the proposals to be evaluated. These data will also be collected in CSV forms (Excel files) and stored in the internal repository IN2P3 Box at CNRS.

Once a project has been selected for funding, the OSCARS staff will have to ask for additional information from the coordinating organisation (bank account, postal address, VAT number). The information will be collected via an editable PDF document to be filled in by the organisation itself. This information will be recorded and kept in the CNRS supplier database.

The coordinating organisation will have to sign the Third Party Project Agreement (PDF). Once the contract is signed, the organisation will receive the funding according to the payment schedule outlined in the TPPA.



In general, personal and sensitive data will be stored in the internal repository IN2P3 Box at CNRS, whereas all the working documents created in the lifetime of the project are stored in a dedicated shared Google Drive run by Trust-IT.



3. FAIR data

3.1. Making data findable

All OSCARS non-sensitive deliverables and blueprints will be published in the OSCARS community on Zenodo, thus they will be findable via a DOI. Other documents and resources, such as presentations, videos, guidelines, etc. will be accessible from the "Resources" section on the OSCARS website - https://oscars-project.eu/resources, filtered by year and by document type.

3.2. Making data openly accessible

WP2: Broadly speaking, there are two main categories of data within WP2: the data produced directly as the result of OSCARS activity and the services within the clusters that form the basis of various CODAS. The information produced by OSCARS (for example, the catalogue of services and data sources) will be made accessible through data publications provided under a liberal licence. The services and data sources within clusters will have their own management infrastructure, where OSCARS WP2 activity may seek to make such data more accessible as a necessary step for establishing CODAS. For example, within a cluster's comprehensive CODAS, scientists are individually authenticated and authorised, provided with access to datasets, can select software from a catalogue, and are provided with facilities to run workflows. As a result, they can publish research products such as publications, research data and research software. WP2 is therefore dedicated to implementing this vision and, what's more, to making data openly accessible.

WP3 will produce a document enabling OSP description and annotation, but most information will remain internal to the OSCARS project, except for public deliverables. Confidentiality will extend to Competence Networks, support activities, and collaboration details. However, the Interim Policy Briefing and Competence Centers Strategy for Science Clusters in EOSC will be fully available in the reports. The Dashboard schema will be shared, potentially through a publication, though its content will not be disclosed. The registry content will be managed by each recorded person, taking into account the GDPR regulations.

WP4 has created a website dedicated to the OSCARS project. The Website has been developed by Trust-IT's on Drupal and will be live throughout the whole duration of the project. CERIC-ERIC is in charge of the content, Trust-IT of the technical implementation and maintenance. At the end of the project, the website will be kept available for five more years, to enable a more effective exploitation of the results, originating directly from



OSCARS but also from the successful projects funded under the Open Calls for Open Science projects and services.

The results of the Open Science projects funded via the OSCARS Open Calls will be made public and openly accessible via the OSCARS website.

All project deliverables will be published on Zenodo, and will thus be accessible via a DOI. They will also be accessible via a direct link from the Resources section of the project website. The Resources section provides in addition access to project presentations, videos, position statements, and any other resources of interest for OSCARS' stakeholders allowing them to filter by year and/or resource type.

The videos produced during the project will be published in the OSCARS Youtube channel and will stay public even after the project ends.

3.3. Making data interoperable

WP1: Collaboration and consolidation of the Science Clusters promotes their long-term role(s) in framing an offer to accompany, help, involve, coordinate, and empower scientists to commit to Open Science practices, to uptake EOSC, and to foster the uptake of Science Clusters' services and solutions.

The cross-fertilisation research and innovation framework that the Science Clusters have developed and deployed within the H2020 work programme fosters consolidation towards the structural development of Community-based Competence Centres (CCC).

WP1 is developing a common definition of CCC and finding the right glossary and vocabulary to make data interoperable. The CCC vocabulary will be used wherever possible, and indeed a number of WP1 activities will contribute to the development of the CCC vocabulary. Correspondences between CCC and EOSC systems for vocabulary will probably be a subject of study in the work package.

WP2: OSCARS will provide machine actionable descriptions of the data it publishes. In as far as it is possible, such descriptions will be aligned with existing ontologies. The work on developing CODAS will likely benefit from the interoperability of the underlying data sources. Therefore, the WP2 activity will drive such interoperability where such work fits within the overarching CODAS concept.



WP3: WP3 will ensure the interoperability of the data stewards registry and the competence centre dashboard by following key principles and standards to enhance compatibility across different platforms. This will involve structuring data and metadata effectively and using common vocabularies and ontologies. Robust APIs and secure access protocols will enable seamless interaction with the registry. WP3 will also enrich and maintain the data dictionary for these tools, and harmonise its definitions with existing others in other EOSC projects or broader with standards recommended by international fora (e.g. Research Data Alliance). It will also participate in the CCC Vocabulary building led by WP1.

3.4. Increase data re-use

WP2: Collaborations will be sought with various external groups, including similar EU-funded projects. Such collaborations will allow for the dissemination of WP2 outputs to a variety of communities, increasing the opportunity for data re-use. Where possible, WP output will be made available through external publishing services, such as Zenodo.

WP3: Through WP3, OSCARS will join efforts within other existing EOSC projects, Task Forces and international fora, initiatives and Working Groups, to tailor platforms for hosting interdisciplinary science projects and to be a catalyst for CODAS building.

WP3 will develop a registry of stakeholders, a dashboard and series of actions in this respect, including the provision of training and coaching, to also ensure developed services are assessed against their usefulness, usability, functionality and performance, by users from various fields of science.

WP4: Third Parties implementing successful Open Call projects will need to adhere to the following rules and obligations (excerpt from the Third Party Project Agreement (TPPA)):

2. Deliverables

- 2.1 By [date], the Third Parties shall deliver to the Coordinator, through the Third Parties Coordinator, the deliverables established in the Project proposal, which shall in any event include the following items ("Deliverables"):
- A final public summary of the Project, in PDF format of maximum 2000 characters, including spaces.
- A scientific journal-type article, summarising the main Project results and methodology used to achieve the Project
- A poster presenting the Project
- 2.2 Subsequently, the Third Parties shall present their Project and related results at the OSCARS Final Assessment Conference in Brussels at a date to be defined by the Coordinator.
- 2.3 The Third Parties shall make available and reproducible the achieved scientific results



as well as any delivered open science service of the Project and must grant royalty-free access to these results to the EOSC Association.

- 8. Use of images, logos and names of the Consortium partners, science clusters as well as their parties
- 8.1 Each Party may refer to and make known the name and nature of the Project, including the names of the Parties involved, for the purposes of the Project.
- 8.2 Notwithstanding the foregoing, the Third Parties shall not use or refer to the image or logo of any of the Consortium Partners without the prior written permission of the Consortium Partner concerned. Any such permission may be withdrawn by the Consortium Partner concerned at any time, and in any event shall expire upon termination of this Agreement.
- 10. Publication and communication of results
- 10.1 Subject to Article 5, the Third Parties shall strive to jointly disseminate the results generated under the Project and shall ensure Open Access to all their resulting scientific publications. The copyright in any article shall be vested in the Third Party(ies) having contributed to that article.
- 10.2 Any dissemination shall expressly mention that the Consortium Partners are not responsible for any use that may be made of the results.
- 10.3 Notwithstanding any intellectual property rights into the Deliverables by the Third Parties, the Third Parties agree to the dissemination of the Deliverables, in whole or in part, by the Consortium Partners at the OSCARS Final Assessment Conference in Brussels and beyond.
- 10.4 Any communication by the Third Parties shall expressly mention that it only reflects the Third Parties' views and not necessarily those of the Consortium Partners.
- 10.5 Third Parties agree that the Consortium Partners grant royalty-free access to the Project's deliverables to the EOSC Association for monitoring and developing policies and strategies for the European Open Science Cloud.
- 10.6 Third Parties agree that the Consortium Partners deposit the digital research data generated by the Project and delivered as part of the Project's results in a trusted repository of the five Science Clusters or any other federated in the European Open Science Cloud (EOSC) in compliance with EOSC requirements.
- 10.7 Any dissemination by the Third Party of the scientific outcomes of the funded project shall expressly mention that the project was funded by OSCARS, an Horizon Europe grant (GA number 101129751) led by the five Science Clusters: ENVRI, ESCAPE, LS RI, PaNOSC, SSHOC.



4. Allocation of resources

OSCARS follows the FAIR principles from its beginning. Additional costs for making scientific data FAIR are included and relate to data processing, data cleaning, releasing, archiving and providing documentation.



5. Data security

Data security is a part of the requirements for the OSCARS project. The objective is to create or use a certified repository for long-term preservation and curation, mainly for software and service, but also in parts for data.

Trust-IT will set up a password protected Intranet on the website that will allow direct access to the project's internal documents. Internal documents will be stored in a safe dedicated repository hosted by CNRS. Access is only possible on invitation by CNRS-LAPP staff members. The public reports, technical documents, or any other public documents will be findable on the OSCARS website in a dedicated page and on the Science Clusters' webpage to ensure sustainability beyond the lifetime of the OSCARS website.

Internal documents produced by work package 4 are on a platform hosted by CNRS (CCIN2P3 Lyon, France) with a safe access security: either login via Edugain or access to the files from a personal email invitation.

5.1. Evaluation process of the proposals

The Evaluator must put in place appropriate technical and organisational security measures to address the risks inherent to data processing and prevent unauthorised people from accessing computer systems that process personal data, and especially the unauthorised reading, copying, alteration or removal of storage media; unauthorised data input, disclosure, alteration or deletion of stored personal data; unauthorised use of data-processing systems by means of data transmission facilities.

- Ensure that a data-processing system's authorised users can access only the personal data to which their access right refer;
- Record which personal data have been communicated by the Evaluator, when and to whom;
- Ensure that personal data being processed on behalf of third parties can be processed only in the manner prescribed by the contracting party;
- Ensure that, during communication of personal data and transport of storage media, the data cannot be read, copied or deleted without authorisation;
- Design its organisational structure in a way that meets data protection requirements.



6. Ethical aspects

All the Work Packages will ensure that ethical requirements are met during the course of the project. All personal data collected during any event registration or through the online application on Trust-It's platform or any survey will be protected and processed following the guidelines set in Art. 6 (1) (b) GDPR.

6.1. Evaluation process of the proposals

Processing of personal data by the contracting party (evaluators and Trust-It): The contracting party must process all personal data included in the Contract according to the General Data Protection Regulation 2016/679. Such data must be processed by the contracting party ('data controller') solely to perform, manage and monitor the Contract. The data may also be sent to persons or bodies responsible for monitoring or inspecting the application of EU law.

The Evaluator has the right to access their personal data and to correct it. Any questions about or corrections to the Evaluator's personal data must be sent to the data controller.

The Evaluator has the right of recourse to the European Data Protection Supervisor.

Processing of personal data by the Evaluator: If the Contract requires the Evaluator to process personal data, the Evaluator may only act under the supervision of the data controller identified above. This is the case in particular for determining why personal data should be processed, what categories of data may be processed, who will have the right to access the data, and how the data subject may exercise their rights.

The Evaluator must keep all records and supporting documentation for a period of three years from the OSCARS' Project end date of the 31st of December 2027 to allow the contracting party to meet its requirements in respect of the Grant Agreement. In the event of any on-going verifications, audits, investigations, appeals, litigation or pursuit of claims, the Evaluator must keep the records and supporting documents until these procedures end.

6.2. Funded projects and services

All projects should foresee the use of data and services already on-boarded to the EOSC platform, the Science Cluster resources and/or bring new digital research objects and RI services to the EOSC Exchange platform. The proposals shall support the FAIR principles and adopt relevant FAIR metrics and EOSC policies;



Projects must deposit the digital research data generated in the Science Clusters' trusted catalogues or other trusted repositories federated in the EOSC.

Data processing by the beneficiaries

The beneficiaries must process personal data under the Agreement in compliance with the applicable EU, international and national law on data protection (in particular, Regulation 2016/679.

They must ensure that personal data is:

- processed lawfully, fairly and in a transparent manner in relation to the data subjects,
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes,
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed,
- accurate and, where necessary, kept up to date,
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed,
- processed in a manner that ensures appropriate security of the data.

The beneficiaries may grant their personnel access to personal data only if it is strictly necessary for implementing, managing and monitoring the Agreement. The beneficiaries must ensure that the personnel is under a confidentiality obligation. The beneficiaries must inform the persons whose data are transferred to the granting authority and provide them with the Portal Privacy Statement.



7. Appendixes

7.1. Data dictionary

The data dictionary is a key component for data interoperability (when you mobilise data for reuse, having the minimum information on what they contain). It is also a FAIR principle in itself (I2, FAIR vocabulary and/or terminology).

We have started to develop the data dictionary, at the moment it is available only for OSCARS consortium members, but once a public version is available it will be published on Zenodo and also available via the OSCARS Resources Webpage:

https://oscars-project.eu/resources

7.2. OSCARS website privacy policy

Website Privacy Policy

OSCARS Joint Controllers, constituted by Trust-IT Services Srl, CNRS and CERIC-ERIC and represented by Trust-IT Services Srl, with registered offices in via Francesco Redi, 10, 56124 Pisa (IT) — VAT no. and Fiscal Code IT01870130505, are committed to protecting the online privacy of the users of this website ("Website").

As such, this Privacy Policy has been written in order to allow you to understand OSCARS Joint Controllers 's policy regarding your privacy, as well as how your personal information will be handled when using the Website. This Privacy Policy will also provide you with information so that you are able to consent to the processing of your personal data in an explicit and informed manner, where appropriate.

In general, any information and data which you provide to OSCARS Joint Controllers over the Website, or which is otherwise gathered via the Website by OSCARS Joint Controllers, in the context of the use of Website's services ("Services") as better defined in Section 3² below, will be processed by OSCARS Joint Controllers in a lawful, fair and transparent manner. To this end, and as further described below, OSCARS Joint Controllers take into consideration internationally recognised principles governing the processing of personal data, such as purpose limitation, storage limitation, data minimisation, data quality and confidentiality.

² https://oscars-project.eu/privacy-policy# msocom 1



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- 1. Data controller

OSCARS Joint Controllers, as identified at the top of this Privacy Policy, are the data controllers regarding all personal data processing carried out through the Website. You can contact OSCARS Joint Controllers with any questions related to this Privacy Policy or the OSCARS Joint Controllers's personal data processing practices by sending a written communication to info@oscars-project.eu, or via the contact forms available on the Website.



2. Personal Data processed

When you use the Website, OSCARS Joint Controllers will collect and process information regarding you (as an individual) which allows you to be identified either by itself, or together with other information which has been collected. OSCARS Joint Controllers may also be able to collect and process information regarding other persons in this same manner, if you choose to provide it to OSCARS Joint Controllers, also via the Website.

This information may be classified as "**Personal Data**" and can be collected by OSCARS Joint Controllers both when you choose to provide it (e.g., when you subscribe to the newsletter or request other Services provided by OSCARS Joint Controllers over the Website) or simply by analysing your behaviour on the Website.

Personal Data which can be processed by OSCARS Joint Controllers through the Website are as follows:

a. Name, contact details and other Personal Data

In various areas of the Website – including, in particular, if you decide to create an account on the Website – you will be asked to submit information about yourself, such as your name, professional title, organisation name/type, primary (and secondary) domain of work/expertise, e-mail address, city/country of residence, address, gender, Twitter handle, LinkedIn profile, and picture. Mandatory fields will be marked as such in the online registration forms – it is not possible to process your registration if any of the mandatory fields are left incomplete.

In addition, whenever you communicate with OSCARS Joint Controllers by submitting a general enquiry or a support ticket via the Website, as well as whenever you participate in surveys which may be available on the Website, OSCARS Joint Controllers may collect additional information which you choose to provide.

Regarding any applications received, OSCARS Joint Controllers may assess the professional social media accounts (e.g. LinkedIn, Twitter) or professional websites of candidates, where publicly available or disclosed by the candidate, as necessary to gain insight as to a candidate's suitability for the position/function to which the candidate applied.

When signing up for an event via the Website (such as a workshop organised or promoted by the Website), you will also be asked to provide details such as your name, your Twitter handle, the dates on which you will be attending and other information of relevance for the



management of your attendance. Your payment details (including debit/credit card number and bank account details as needed) will be processed via an external payment gateway.

b. Special categories of Personal Data

When signing up for an event via the Website (such as a workshop organised or promoted by the Website), you will also be asked whether you have any special dietary/access requirements which might need accommodation. This Personal Data may potentially qualify as "health data" or "data revealing your religious/philosophical beliefs", which are special categories of personal data under Art. 9 GDPR, and will be processed only with your explicit consent.

Certain areas of the Website may include free text fields, where you can write messages to OSCARS Joint Controllers or otherwise allow you to post various types of content on the Website, which may contain Personal Data. Where these fields are completely free, you may use them to disclose (inadvertently or not) more sensitive categories of Personal Data, such as data revealing your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership. The content you upload in these fields may also (inadvertently or not) include other types of sensitive information relating to you, such as your genetic data, biometric data or data concerning your health, sex life or sexual orientation.

OSCARS Joint Controllers ask that you do not disclose any sensitive Personal Data on the Website, unless you consider this to be strictly necessary. As it is totally optional to provide this information, if you nonetheless choose to do so, please mind that OSCARS Joint Controllers requires your **explicit consent** to process this sort of Personal Data (which can be provided, e.g., by declaring that you "explicitly consent to the processing of my special categories of personal data for the purpose of assessing my candidacy").

c. Other persons' Personal Data

As mentioned in the previous section, certain areas of the Website include free text fields where you can write messages to OSCARS Joint Controllers, or otherwise allow you to post various types of content on the Website. These messages and content may (inadvertently or not) include Personal Data related to other persons.

In any situation where you decide to share Personal Data related to other persons, you will be considered as an independent data controller regarding that Personal Data and must



assume all inherent legal obligations and responsibilities. This means, among other things, that you must fully indemnify OSCARS Joint Controllers against any complaints, claims or demands for compensation for damages which may arise from the processing of this Personal Data, brought by the third parties whose information you provide through the Website.

As OSCARS Joint Controllers does not collect this information directly from these third parties (but rather collects them, indirectly, from you), you must make sure that you have these third parties' consent before providing any information regarding them to OSCARS Joint Controllers; if not, then you must make sure there is some other appropriate grounds on which you can rely to lawfully give OSCARS Joint Controllers this information.

d. Browsing data

The Website's operation, as is standard with any websites on the Internet, involves the use of computer systems and software procedures, which collect information about the Website's users as part of their routine operation. While OSCARS Joint Controllers does not collect this information in order to link it to specific users, it is still possible to identify those users either directly via that information, or by using other information collected – as such, this information must also be considered Personal Data.

This information includes several parameters related to your operating system and IT environment, including your IP address, location (country), the domain names of your device, the type of device, the URI (Uniform Resource Identifier) addresses of resources you request on the Website, the time of requests made, the method used to submit requests to the server, the dimensions of the file obtained in response to a request, the numerical code indicating the status of the response sent by the server (successful, error, etc.), and so on.

These data are used to compile statistical information on the use of the Website, to ensure its correct operation, as well as restore backup from possible failures of the Website and identify any faults and/or abuse of the Website. Save for this last purpose, these data are not kept for more than 60 business days.

e. Cookies

Definitions, characteristics, and application of standards

Cookies are small text files that may be sent to and registered on your computer by the websites you visit, to then be re-sent to those same sites when you visit them again. It is thanks to these cookies that those websites can "remember" your actions and preferences



(e.g., login data, language, font size, other display settings, etc.), so that you do not need to configure them again when you next visit the website, or when you change pages within a website.

Cookies are used for electronic authentication, monitoring of sessions and storage of information regarding your activities when accessing a website. They may also contain a unique ID code which allows tracking of your browsing activities within a website, for statistical or advertising purposes. Some operations within a website may not be able to be performed without the use of cookies which, in certain cases, are technically necessary for operation of the website.

When browsing a website, you may also receive cookies from websites or web servers other than the website being visited (i.e., "third-party cookies").

There are various types of cookies, depending on their characteristics and functions, which may be stored on your computer for different periods of time: "session cookies", which are automatically deleted when you close your browser, and "persistent cookies", which will remain on your device until their pre-set expiration period passes.

According to the law which may be applicable to you, your consent may not always be necessary for cookies to be used on a website. In particular, "technical cookies" – i.e. cookies which are only used to send messages through an electronic communications network, or which are needed to provide services you request – typically do not require this consent. This includes browsing or session cookies (used to allow users to login) and function cookies (used to remember choices made by a user when accessing the website, such as language or products selected for purchase).

Types of cookies used by the Website

The Website uses the following types of cookies:

OSCARS Joint Controllers also use **third-party cookies** – i.e.cookies from websites / web servers other than the Website, owned by third parties. These third parties will either act as independent data controllers from OSCARS Joint Controllers regarding their own cookies (using the data they collect for their own purposes and under terms defined by them) or as data processors for OSCARS Joint Controllers (processing personal data onOSCARS Joint Controllers's behalf).

 Browsing or session cookies, which are strictly necessary for the Website's operation, and/or to allow you to use the Website's content and Services.



• Analytics cookies, which allow OSCARS Joint Controllers to understand how users make use of the Website, and to track traffic to and from the Website.

For further information on how these third parties may use your information, please refer to their privacy policies:

- LinkedIn
- Twitter
- Youtube

The list of installed cookies is available in the Cookie Policy on the Website.

Cookie settings

You can block or delete cookies used on the Website via your browser options. Your cookie preferences will be reset if different browsers are used to access the Website. For more information on how to set the preferences for cookies via your browser, please refer to the following instructions:

- Chrome
- <u>Firefox</u>
- Internet Explorer
- <u>Safari</u>

You may also set your preferences on third-party cookies by using online platforms such as AdChoice.

CAUTION If you block or delete **technical** and/or **function cookies** used by the Website, the Website may become impossible to browse, certain services or functions of the Website may become unavailable or other malfunctions may occur. In this case, you may have to modify or manually enter some information or preferences every time you visit the Website.

3. Purposes of processing

OSCARS Joint Controllers intends to use your Personal Data, collected through the Website, for the following purposes:



- 1. To allow you to create and maintain a registered user profile on the Website, to allow you to participate in different areas over the Website and exchange information/documents with other participants, to verify your identity and assist you, in case you lose or forget your login/password details for any of the Website's registration services, to send you informative newsletters and other communications (linked to the collaborative areas which you participate in), to respond to your enquiries and requests for support, and to provide any other Services which you may request ("Service Provision");
- 2. To process your sign-up/registration forms for events and webinars hosted or supported by the Website, process your payment details for associated fees, track event attendance and publish attendee lists online ("Events/Webinars");
- 3. To assess applications submitted via the Website, such as collaborating opportunities or for participating to events organised or sponsored by the Website, among others ("Applications");
- 4. To include information on you as a registered Member within the Website database ("Database Publication");
- 5. For compliance with laws which impose upon OSCARS Joint Controllers the collection and/or further processing of certain kinds of Personal Data ("Compliance");
- 6. For development and administration of the Website, in particular by use of data analytics regarding how you and other users make use of the Website, as well as the information and feedback you provide, to improve our offerings ("Analytics");
- 7. To prevent and detect any misuse of the Website, or any fraudulent activities carried out through the Website, including by carrying out internal audits ("Misuse/Fraud").

4. Grounds for processing and mandatory / discretionary nature of processing

OSCARS Joint Controllers's legal bases to process your Personal Data, according to the purposes identified in Section 3, are as follows:

1. **Service Provision**: processing for these purposes is necessary to provide the Services and, therefore, is necessary for the performance of a contract with you – Art. 6(1)(b) GDPR. It is not mandatory for you to give OSCARS Joint Controllers your Personal Data for these purposes; however, if you do not, OSCARS Joint Controllers will not be able to provide any Services to you.



- 2. **Events/Webinars**: processing for these purposes is generally necessary to allow the OSCARS Joint Controllers Team to respond to your request to sign up for an event/webinar and, therefore, is necessary for the performance of a contract with you Art. 6(1)(b) GDPR. However, the tracking of event attendance and publication of attendee lists is done on the basis of the Website's interests in managing events and allowing other participants to become aware of persons taking part at the event Art. 6(1)(f) GDPR. It is not mandatory for you to give OSCARS Joint Controllers your Personal Data for these purposes; however, if you do not, OSCARS Joint Controllers will not be able to process your registration for an event/webinar.
- 3. **Applications**: processing for this purpose is needed in order for OSCARS Joint Controllers to be able to consider your application and, therefore, is necessary to take steps at your request before (potentially) entering into a contract Art. 6(1)(b) GDPR. It is not mandatory for you to give OSCARS Joint Controllers your Personal Data for these purposes; however, if you do not, OSCARS Joint Controllers will not be able to consider your applications.
- 4. **Compliance**: processing for this purpose is necessary for OSCARS Joint Controllers to comply with its legal obligations Art. 6(1)(c) GDPR. When you provide any Personal Data to OSCARS Joint Controllers, OSCARS Joint Controllers must process it in accordance with the laws applicable to it, which may include retaining and reporting your Personal Data to official authorities for compliance with tax, customs or other legal obligations.
- 5. **Analytics**: Information collected for this purpose is used to allow OSCARS Joint Controllers to understand how users interact with the Website and to improve the Website accordingly, with the aim of providing a better user experience Art. 6(1)(f) GDPR.
- 6. **Misuse/Fraud**: Information collected for this purpose is used exclusively to prevent and detect fraudulent activities or misuse of the Website (for potentially criminal purposes) Art. 6(1)(f) GDPR.

5. Recipients of Personal Data – Data Processors

Your Personal Data may be shared with the following list of entities ("Data Processors"):

The following entities are engaged in order to provide or support the Website and Services (e.g., hosting providers, e-mail platform providers, technical maintenance providers Website administrators and Website user administrators):



- CENTRE NATIONAL DE LA RECHERCHE SCIENTIFIQUE CNRS (CNRS-LAPP), PIC 999997930, established in RUE MICHEL ANGE 3, PARIS 75794, France
- ORGANISATION EUROPEENNE POUR LA RECHERCHE NUCLEAIRE (CERN), PIC 999988133, established in ESPLANADE DES PARTICULES 1 PARCELLE 11482 DE MEYRIN BATIMENT CADASTRAL 1046, GENEVE 23 1211, Switzerland
- FORSCHUNGSZENTRUM JULICH GMBH (FZJ), PIC 999980470, established in WILHELM JOHNEN STRASSE, JULICH 52428, Germany
- E-SCIENCE EUROPEAN INFRASTRUCTURE FOR BIODIVERSITY AND ECOSYSTEM RESEARCH (Lifewatch), PIC 909022018, established in PLAZA DE ESPANA S/ N, SECTOR II-III, SEVILLA 41071, Spain
- ILMATIETEEN LAITOS (FMI), PIC 999591306, established in Erik Palmenin aukio 1, HELSINKI 00560, Finland
- EUROPEAN MOLECULAR BIOLOGY LABORATORY (ELIXIR), PIC 999988230, established in Meyerhofstrasse 1, HEIDELBERG 69117, Germany
- EATRIS ERIC (EATRIS), PIC 941506445, established in DE BOELELAAN 1118, AMSTERDAM 1081 HZ, Netherlands
- EUROPEAN RESEARCH INFRASTRUCTURE ON HIGHLY PATHOGENIC AGENTS (ERINHA), PIC 910590314, established in RUE DU TRONE 98/B4, BRUXELLES 1050, Belgium
- EUROPEAN SYNCHROTRON RADIATION FACILITY (ESRF), PIC 999484121, established in 71 AVENUE DES MARTYRS, GRENOBLE 38000, France
- DEUTSCHES ELEKTRONEN-SYNCHROTRON DESY (DESY), PIC 999986969, established in NOTKESTRASSE 85, HAMBURG 22607, Germany
- CENTRAL EUROPEAN RESEARCH INFRASTRUCTURE CONSORTIUM EUROPEAN RESEARCH INFRASTRUCTURE CONSORTIUM (CERIC), PIC 936960831, established in SS. 14, KM 163.5 IN AREA SCIENCE PARK, TRIESTE 34149, Italy
- CLARIN ERIC (CLARIN), PIC 941592872, established in DRIFT 10, UTRECHT 3512 BS, Netherlands
- CESSDA ERIC (CESSDA), PIC 904940937, established in SOLHEIMSGATEN 16, BERGEN 5058, Norway



- DIGITAL RESEARCH INFRASTRUCTURE FOR THE ARTS AND HUMANITIES (DARIAH), PIC 935217741, established in 54 BOULEVARD RASPAIL, PARIS 75006, France
- COMMpla srl, via Francesci Redi 10, 56127 Pisa (PI) Italy. CF and PIVA: 01958380501
- Mailjet Ops. 15 Rue De L'Aubrac, 75012, Paris, France
- Zoom Video Communications, Inc., 55 Almaden Blvd, Suite 600, San Jose, CA 95113, managing webinar service with Personal Data Residency in Europe
- Google Ireland Limited; Gordon House Barrow Street, Dublin 4 DUBLIN, D04 E5W5
 Ireland, managing the Google Analytics service for European-based websites

6. Other Recipients of Personal Data

Your Personal Data may be shared with the following list of persons/entities ("Recipients"):

- Persons, companies or professional firms providing the OSCARS Joint Controllers with advice and consultancy regarding accounting, administrative, legal, tax, financial and debt collection matters related to the provision of the Services and which act typically as data processors on behalf of the OSCARS Joint Controllers;
- Persons authorised by OSCARS Joint Controllers to process Personal Data needed to carry out activities strictly related to the provision of the Services, who have undertaken an obligation of confidentiality or are subject to an appropriate legal obligation of confidentiality (e.g., members of the team operating the Website, and other functions with access to Personal Data processed via the Website);
- Public entities, bodies or authorities to whom your Personal Data may be disclosed, in accordance with the applicable law or binding orders of those entities, bodies or authorities.

Additionally, with your consent, some of your Personal Data may be published in the webpages available online at the Website. Furthermore, when you sign-up for an event, you will be listed in attendee lists made available on the Website.

More information on these transfers is available upon written request to the Website Managing Team at the following address: info@oscars-project.eu.



7. Retention of Personal Data

Personal Data processed for **Service Provision** and **Events/Webinars** will be kept by OSCARS Joint Controllers for the period deemed strictly necessary to fulfil such purposes – in any case, as these Personal Data are processed for the provision of the Services, OSCARS Joint Controllers may continue to store this Personal Data for a longer period, as may be necessary to protect OSCARS Joint Controllers's interests related to potential liability related to the provision of the Services.

Personal Data processed for **Applications** will be kept by OSCARS Joint Controllers for up to 5 years. OSCARS Joint Controllers may contact applicants before the expiration of this period, in order to request an extension of the retention period.

Personal Data processed for **Database Publication** will be kept by OSCARS Joint Controllers from the moment you give consent until it is withdrawn. Where it is not withdrawn, consent will be renewed at fixed intervals. Once consent is withdrawn (or not given, following a renewal), Personal Data will no longer be used for these purposes, although it may still be kept by OSCARS Joint Controllers in particular as may be necessary to protect OSCARS Joint Controllers' interests related to potential liability related to this processing.

Personal Data processed for **Compliance** will be kept by OSCARS Joint Controllers for the period required by the specific legal obligation or by the applicable law.

Personal Data processed for preventing **Misuse/Fraud** will be kept by OSCARS Joint Controllers for as long as deemed strictly necessary to fulfil the purposes for which it was collected.

More information on applicable retention periods is available upon written request to the Website Managing Team at the following address: info@oscars-project.eu.

8. Data subjects' rights

As a data subject, you are entitled to exercise the following rights before OSCARS Joint Controllers, at any time:

- Access your Personal Data being processed by OSCARS Joint Controllers (and/or a copy of that Personal Data), as well as information on the processing of your Personal Data;
- 2. Correct or update your Personal Data processed by OSCARS Joint Controllers, where it may be inaccurate or incomplete;



- 3. Request erasure of your Personal Data being processed by OSCARS Joint Controllers, where you feel that the processing is unnecessary or otherwise unlawful;
- 4. Request the restriction of the processing of your Personal Data, where you feel that the Personal Data processed is inaccurate, unnecessary or unlawfully processed, or where you have objected to the processing;
- 5. Exercise your right to portability: the right to obtain a copy of your Personal Data provided to OSCARS Joint Controllers, in a structured, commonly used and machine-readable format, as well as the transmission of that Personal Data to another data controller;
- 6. Object to the processing of your Personal Data, based on relevant grounds related to your particular situation, which you believe must prevent OSCARS Joint Controllers from processing your Personal Data; or
- 7. Withdraw your consent to processing (for, **Database Publication**).

Please note that most of the Personal Data you provide to OSCARS Joint Controllers can be changed at any time, including your email preferences, by accessing, where applicable, your user profile created on the Website.

You can also withdraw consent for the Website's newsletter which you may have subscribed to and receive as a Service.

Aside from the above means, you can always exercise your rights described above by sending a written request to the Website Managing Team at the following address: info@oscars-project.eu.

In any case, please note that, as a data subject, you are entitled to file a complaint with the competent supervisory authorities for the protection of Personal Data, if you believe that the processing of your Personal Data carried out through the Website is unlawful.

9. Amendments

This Privacy Policy entered into force on 01/01/2024

OSCARS Joint Controllers reserves the right to partly or fully amend this Privacy Policy, or simply to update its content, e.g., as a result of changes in applicable law. The Website Managing Team will inform you of such changes as soon as they are introduced, and they will be binding as soon as they are published on the Website. The Website Managing Team



therefore invites you to regularly visit this Privacy Policy in order to acquaint yourself with the latest, updated version of the Privacy Policy, so that you may remain constantly informed on how OSCARS Joint Controllers collects and uses Personal Data.

