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Version 15**Date: 29/10/2019****Author(s):****Emma Teodoro****Pompeu Casanovas****Jorge González-Conejero****Nicholas Morris****EAB Members**

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Nicholas Morris ((UAB-La
Trobe), Pompeu Casanovas (UAB-La
Trobe)

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1 Executive Summary

Deliverable 9.1 provides the Informed Consent Templates Forms to be used during the requirements and use-cases elicitation activities and the evaluation phase of the SPIRIT project.

Section 2 provides some insights regarding informed consent within the processing of personal data in the SPIRIT research activities.

Section 3 includes a working template of the consent form that will be completed by participants involved in Task 2.1, T. 2.5 of Work Package 2.

Section 4 provides an informed consent template form for the evaluation activities of the SPIRIT Platform planned in Task 8.5 of Work Package 8.

In the Ethical check conducted in M6 the Ethical Panel considered the requirements related to the Informed Consent fulfilled. However, the Deliverable has been updated with the aim of incorporating the comments and recommendations received from the mid-term review. In particular, Section 5 and 6 have been included to report on progress regarding the Informed Consent for data processing in the context of test and demonstration activities and to refer to the content of Informed Consent training activities conducted by the ethical lead partner of the project respectively.

Annex I includes the English summary template (requirements and end-user cases elicitation).

Finally, Annex II compiles the letters for the EAB approval corresponding to the content of this Deliverable.

2 Informed Consent in the context of the SPIRIT Project

2.1 Processing of personal data for scientific purposes

The processing of personal data for scientific purposes is addressed specifically in Article 89 (1) of the General Data Protection Regulation. This article, in line with Recital 156, states that:

“Processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, shall be subject to appropriate safeguards, in accordance with this Regulation, for the rights and freedoms of the data subject. Those safeguards shall ensure that technical and organisational measures are in place in particular in order to ensure respect for the principle of data minimisation. Those measures may include pseudonymisation provided that those purposes can be fulfilled in that manner. Where those purposes can be fulfilled by further processing which does not permit or no longer permits the identification of data subjects, those purposes shall be fulfilled in that manner”

The data minimisation principle referred to in this Article 89 (1) is defined in Article 5 (1c) with the following wording:

“Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’)

In relation to “appropriate safeguards”, the Article 29 Working Party¹ (replaced by the European Data Protection Advisory Board²) understands that:

- Data minimization, anonymisation and data security are mentioned as possible safeguards, with anonymisation the preferred solution if the research purpose cannot be achieved without processing personal data
- Transparency³ is considered an additional safeguard when it is not possible to obtain specific consent for the research.

Within the context of the SPIRIT Project this principle provides a minimum legal constraint within the SPIRIT research activities. Due to the nature of the project it is possible that special categories of data may emerge when carrying out techniques for qualitative research. For this reason, the data minimisation principle will be used as a precautionary principle. This will be strongly monitored by all the internal and external monitoring structures foreseen for the project⁴. In particular, the SPIRIT

¹ Article 29 Working Party, Guidelines on consent under Regulation 2016/679, WP 259, 1st 28 November 2017. Available at: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=623051

² See: https://edpb.europa.eu/edpb_en

³ See: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=622227

⁴ See: SPIRIT D.9.3 Ethics Advisory Board

Ethics Advisory Board and the SPIRIT Data Protection Officer will ensure that the processing of this sensitive data is an exception in line with articles 89 and 5.

2.2 Ethical guidelines for conducting qualitative research activities within the SPIRIT project

The SPIRIT project foresees (WP2) the development of a set of qualitative research activities. Particularly, SPIRIT partners involved in these tasks will develop a socio-technical methodology to engage with users to understand their needs and preferences. Questionnaires (on location), interviews, focus groups and environment scenarios and workshops will be conducted to get expert views and opinions about the system from the SPIRIT end-users (requirements and use cases), system developers and ethical consultants. The final goals of WP2 are to specify requirements and perform the architectural design of SPIRIT from an end-user perspective.

Since the conducting of qualitative research also entails the processing of personal data, data protection principles and legal requirements extracted from Regulation 2016/679 must be taken into consideration. According to Recital 78 of the Regulation *“minimising the processing of personal data, pseudonymising personal data as soon as possible, transparency with regard to the functions and processing of personal data, enabling the data subject to monitor data processing”*.

Measures for the qualitative research within the SPIRIT project are provided below:

1. Information collected from the participants will be anonymised by those responsible for the research activity. The SPIRIT partner responsible for a Task involving qualitative research will prepare a summary (a template is provided in Annex I), in English, of the research conducted (questionnaires in location, interviews, focus groups, workshops, scenario environment). The raw information will be kept as local resources by the partners under their own responsibility and according to the data policies of their own organisations. Partners shall play special attention to the respect of the minimisation principle (Article 89 (1) of Regulation 2016/679).
2. Each task leader will collect the English summaries and send them to the ethics lead of the project, the UAB. Jointly with the EAB they will ensure that no personal data or sensitive information is contained in the summary. Once this point is verified the summary can be shared within the SPIRIT Consortium.
3. Researchers must obtain specific consent from all the participants prior to their involvement in the research activities.

4. The Informed Consent Form must be specific for each research activity. IDT, after approval of the SPIRIT EAB, has created specific templates of Informed Consent Forms considering the different research activities and their nature (Section 3 and 4).
5. The task leader for each activity will propose a final version of the informed consent form containing the specific information related to each research activity. The SPIRIT EAB will validate the version sent of that document before it is used with any participants.
6. Informed Consent must be obtained, as a general rule, in writing. Although oral consent is legally valid, it is highly discouraging (accountability principle) due to the nature of the SPIRIT project. Therefore, researchers should only use this procedure when there is no other possibility and after consulting the SPIRIT EAB.

3 Informed Consent Form for user requirements and use-cases elicitation activities

This is the informed consent form designed for users' requirement elicitation planned in Task 2.1 and Task .2.5 of WP2.

SPIRIT Informed Consent Form Template

PART I: Informed Consent Information Sheet

Informed Consent procedures

Ethical issues related to research activities of the H2020 European project *SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities* (hereinafter also referred to as “SPIRIT”), coordinated by LUTECH SPA (Italy), are identified and defined here according to the European and national regulations in force. These ethical issues have been analysed from the SPIRIT perspective and include recruitment of participants, information to participants, informed consent and data handling during the planned research activities.

Before requesting consent, researchers shall ensure that participants have received written, and, if requested, additional oral information. Researchers shall provide clear and understandable guidelines on the research activity.

In addition, participants should be given sufficient time to make an informed decision on the requested consent. Participants shall be informed that they are free to withdraw from participation at any time, that their personal data will remain confidential and anonymous, and that collected data will be processed securing their privacy and anonymity.

This information sheet provides to the participants detailed information on:

- purpose of the research and of the processing operations for which consent is given
- information about how to withdraw from the activity and/or request one's contribution to be removed from the test
- duration of the research activities
- possible risks, discomfort or disadvantages
- adopted procedures
- voluntary participation
- benefits, incentives to the subject or others

- data protection and confidentiality and privacy policies
- information on procedures related to their data and results at the end of the SPIRIT project lifespan
- controller's identity
- information on SPIRIT project contact persons

A sample informed consent document is provided below. For those research activities that involve non-English speaking participants the document will be translated to their native languages.

Ethics, privacy and data protection requirements

Ethical implications raised when conducting SPIRIT research activities will be addressed in strict compliance with the ethical and legal framework specifically identified for the project. Particularly, Regulation (EU) 2016/679 of 27 April 2016.

All the data will be processed according to the European and national legal framework in force. All the participants will receive proper information on the project objectives, expected results and limits of the research before giving their informed consent. In accordance with the nature of the project, specific information shall be provided to participants concerning the incidental findings policy designed.

The SPIRIT Ethics Advisory Board will provide guidance to the task leaders of the research activities if needed.

PART II: Informed Consent Document for the elicitation of users' requirements and use cases.

Introduction

You have been invited to take part in the H2020 European project **"SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities"** (hereinafter also referred to as "SPIRIT"), coordinated by LUTECH SPA (Italy).

Before deciding on whether you want to participate or not, please read this document carefully.

Please ask all questions you may have so you can be completely sure that you understand all the proceedings of the research, including potential risks and benefits.

This informed consent document may include words that you do not understand. If this is the case, please ask the contact researcher or any other member of the research staff to fully explain the meaning of the word or clarify pieces of information.

At all times, the SPIRIT Project Consortium states its commitment to conduct all the research activities in strict compliance with the EU highest research ethical standards and the European and national privacy and data protection regulations.

About the project

The Internet has caused significant shifts in the patterns of criminal activity, enabling organised crime groups to access a large pool of victims, obscure their activities, and carry out a diverse range of criminal acts on a much larger scale than ever before. Frequently, these criminal activities are committed remotely and with anonymity, making detection and prosecution more complex than crimes that do not rely on the Internet and the virtualised modus operandi. Thus, for Law Enforcement and control agencies, the detection of identity fraud remains a complex task.

SPIRIT addresses the issues above by proposing a semantically rich sense-making set of tools aimed at detecting identity fraud patterns. This set of tools will enable complex associative searches over all sources relevant to the current investigation, correlate information from multimedia data, analyse information with certainty, and structure and manipulate information into a unified view of the available evidence over a persisted, searchable knowledge base.

The final goal of the project is to empower the investigator to create a semantically rich picture over all the available evidence to be presented in court. This will, in the short term, improve collaboration between investigators and reduce investigation time, which will lead to crimes being solved more rapidly. In the medium term, LEA personnel will be provided with more efficient tools to assist in their very specialised daily work. In the longer term the more rapid solving of crimes will reduce the costs of investigations, reducing the impact of criminality on society.

Project research activities will last 3 years, from 1 August 2018 to 31 August 2021.

Purpose of data collection

The aim of the research activity is to perform a prioritized list of end-users' requirements and use-cases on the basis of your needs and preferences.

You are being invited to take part in this (*Questionnaire/Interview/Focus Group/Environment Scenarios*) due to your professional expertise. The research activity consists on *the elicitation of end-user requirements and needs of the system from a stakeholder perspective (T.2.1) or the workshop focus on LEAs investigative workflows and use-scenarios (T.2.5)*.

Types of data to be collected

Your personal data (name/surname/occupation) will be collected by the task leader of the activity (*Add the name of the partner in charge of the research activity*). Data will be processed for the purpose of running the (*Questionnaire/Interview/Focus Group/Environment Scenarios/Workshops*) within SPIRIT and carrying out project activities only. Personal data from the participants will be kept under the responsibility of the controller, in this case SPIRIT coordinator, and will not be shared or transferred to partners others than those directly involved in the development of the research activity.

Your data will be gathered on (*paper/computer files*), stored in our offices at (*Partner Name responsible of the research activity*) premises and accessed only by us or other selected personnel who might be authorised to work on SPIRIT. It will be stored securely and confidentially until the project activities have been completed (31 August 2021).

Privacy and confidentiality

Any personal or professional views or opinion you might express during the (*Questionnaire/Interview/Focus Group/Environment Scenarios/Workshops*) will be processed and rendered anonymous before dissemination within the SPIRIT Consortium partners. This implies that by no means the opinions or views you expressed will be related directly to your personal data in the final project deliverables. In other words, your opinions and views will be processed in a way that inhibits tracing them back to you. The SPIRIT Consortium partner who sees/accesses this information will keep it confidential. Nothing of the personal data provided will be handed to third parties.

The SPIRIT partner responsible for the research activity will elaborate an English summary on the basis of the information gathered from (*Interview, Focus Group, Environment Scenarios, Workshop*) to the rest of the SPIRIT Consortium. No personal data will be included in such summaries.

The results of this investigation will be published in scientific journals or conferences and may be used in other projects. The authorization for the use and access of this information is valid until the end of the project unless you decide to cancel it before.

Voluntary participation and right to withdraw

Your participation in the SPIRIT project is completely voluntary.

You are free to withdraw from the project, without giving a reason for your withdrawal and without any consequences to your future treatment by the researcher. If you decide to withdraw from the

project, please contact the SPIRIT contact person(s) provided in this document. In addition, you can make contact with the Data Protection Officer of the SPIRIT project (SPIRIT DPO).

You should know that you might be withdrawn from the project for any of the following reasons:

- If you don't follow the SPIRIT Consortium instructions
- If you don't attend the scheduled data collection sessions
- If the whole project is terminated for reasons not known now.

You retain all rights provided by the applicable data protection legislation, in any case:

- Access
- Information
- Rectification
- Erasure
- Right to be forgotten
- Restriction of processing

Potential Risks or inconveniences

There could be a risk that you may share some confidential information by chance, or that you may feel uncomfortable talking about some of the topics. If you say anything that you realise you do not want to be reported you can inform the responsible research of the activity at any moment during the (*Questionnaire, Interview, Focus Group, Environment Scenario, Workshops*) or when it is ended. All information provided will be treated in the strictest of confidence.

Incentives

You will not be provided any incentive to take part in the (*Questionnaire, Interview, Focus Group, Environment Scenarios, Workshops*).

Contact persons

In case of any issue involving you in your role as participant of this project, you are invited to inform:

- the SPIRIT project coordinator and contact person Paolo Fabbri-LUTECH SPA (Italy) via email: P.Fabbri@lutech.it
- the SPIRIT Data Protection Officer, Massimiliano Bellavista, via email: SPIRIT.dpo@lutech.it

Confirmation

Your participation within the research activities of the SPIRIT project is only possible if you freely and independently sign this consent.

I hereby declare:

- I am 18 years older and I am competent to provide consent
- I have been fully informed about the objectives of the SPIRIT Project.
- I understand that there is no compulsion to participate in the research activities of the project, so, if I freely and independently decide to participate, I may at any stage withdraw my participation
- I have read a document providing information related to the research and this consent. I have the chance to ask questions to the researchers and all my questions were answered to my satisfaction. I understand the objectives, the impact and the potential results of the SPIRIT research project that researchers provided to me.
- I agree that my data is to be used for scientific purposes and I have no objection that my data is published, providing that it is completely anonymised.
- I understand that no recordings will be replayed in any public forum, or made available to any audience other than the current researcher team.
- I freely and voluntarily agree to be part of this research study, without prejudice to my legal and ethical rights
- I understand that I may refuse any question and that I may withdraw at any time without any consequences
- I understand that my participation is fully anonymous and that no personal details about me will be recorded, without my explicit consent.
- Information may be shared between any of the other partners of the SPIRIT Consortium in an anonymous form. All information I provide will be treated as confidential. The researchers will ensure the preservation of my anonymity.
- I have received a copy of this consent form

This consent form complies with the following relevant European and national laws and regulations. Specifically, this consent is compliant with:

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons about the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; European Guidelines, Opinions and Recommendations by the European Data Protection Supervisor and the European Data Protection Board; European Code of Conduct for Research Ethics

LUTECH SPA (Italy) is the data controller of SPIRIT project and requires this information for scientific purposes and will only process your personal and sensitive data in accordance with the current data protection legislation.

By signing below, you accept to participate in the research according to the requirements explained above.

Name and surname of the participant:

Place, date:

Signature of the participant:

I have explained the nature and purpose of this procedure, the procedures to be undertaken and the risks that may be involved in the research activity. I have provided answers to all the questions received from the participant with regards to the research activity and the SPIRIT project. The participant understands my explanation and has freely given informed consent.

Name and surname of the researcher:

Place, Date:

Signature of the researcher.....

4 Informed Consent Form for the evaluation activities of the SPIRIT platform

This is the informed consent form foreseen for end-user's evaluation activities of the SPIRIT Platform that will be conducted in Task 8.5 (WP8).

SPIRIT Informed Consent Form Template for the evaluation activities of the project

PART I: Informed Consent Information Sheet

Informed Consent procedures

Ethical issues related to research activities of the H2020 European project “**SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities**” (hereinafter also referred to as “SPIRIT”), coordinated by LUTECH SPA (Italy), are identified and defined here according to the European and national regulations in force. These ethical issues have been analysed from the SPIRIT perspective and include recruitment of participants, information to participants, informed consent and data handling during the planned research activities.

Before requesting consent, the responsible of the research activity within the SPIRIT project will ensure that participants (LEAs officers/ staff) have received written and, if requested, additional oral information. Those responsible for the research activity should provide clear and understandable guidelines on the research activity.

In addition, participants should be given sufficient time to make an informed decision on the requested consenting. Participants shall be informed that they are free to withdraw from participation at any time, that their personal data will remain confidential and anonymous, and that collected data will be processed securing their privacy and anonymity.

This information sheet provides to the participants detailed information on:

- purpose of the research and of the processing operations for which consent is given
- duration of the research activities
- possible risks, discomfort or disadvantages
- adopted procedures
- voluntary participation
- benefits, incentives to the subject or others
- data protection and confidentiality and privacy policies

- right to withdraw
- information on procedures related to their data and results at the end of the SPIRIT project lifespan
- data controller’s identity
- information on SPIRIT project contact persons

A sample informed consent document is provided below. For those research activities that involve non-English speaking participants the document will be translated into their native languages.

Ethics, privacy and data protection requirements

Ethical implications raised when conducting SPIRIT research activities will be addressed in strict compliance with: Regulation 2016/679 of 27 April 2016; Directive (EU) 2016/680 of 27 April 2016; and national provisions on data protection in the police sector applicable to the *LEA*.....; SPIRIT Data Protection Officer and Ethics Advisory Board decisions and recommendations.

All the data will be processed according to the European and national legal frameworks in force. All the participants will receive proper information on the project objectives, expected results and limits of the research before giving their informed consent. In accordance with the nature of the project, specific information shall be provided to participants with regards the incidental findings policy designed for the project.

The SPIRIT Ethics Advisory Board will provide specific guidance and assistance to those responsible for the research activity and to the specific LEA involved within each evaluation research activities, if requested.

PART II: Informed Consent Document for the evaluation of the SPIRIT platform.

Introduction

You have been invited to take part in the H2020 European project **“SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities”** (hereinafter also referred to as “SPIRIT”), coordinated by LUTECH SPA (Italy).

Before deciding on whether you want to participate or not, please read this document carefully.

Please ask all questions you may have so you can be completely sure that you understand all the proceedings of the research, including potential risks and benefits.

This informed consent document may include words that you do not understand. If this is the case, please ask the contact researcher or any other member of the research staff to fully explain the meaning of the word or clarify pieces of information.

At all times, the SPIRIT Project Consortium states its commitment to conduct all the research activities in strict compliance with the highest research ethical standards in the EU, and with European and national privacy and data protection regulations.

About the project

The Internet has caused significant shifts in the patterns of criminal activity, enabling organised crime groups to access a large pool of victims, obscure their activities and carry out a diverse range of criminal acts on a much larger scale than ever before. Frequently, these criminal activities are committed remotely and with anonymity, making detection and prosecution more complex than crimes that do not rely on the Internet and the virtualised modus operandi. Thus, for Law Enforcement and control agencies, the detection of identity fraud remains a complex task.

SPIRIT addresses the issues above by proposing a semantically rich sense-making set of tools aimed at detecting identity fraud patterns. This set of tools will enable complex associative searches over all sources relevant to the current investigation, correlate information from multimedia data, understand information which involves uncertainty, and structure and manipulate information into a unified view of the available evidence over a persisted, searchable knowledge base.

The final goal of the project is to empower the investigator to create a semantically rich picture over all the available evidence to be presented at court. This will, in the short term, improve collaboration between investigators and reduce investigation time, which will lead to crimes being solved more rapidly. In the medium term, LEA personnel will be provided with more efficient tools to assist their very specialised daily work. In the longer term the quicker solving of crimes will reduce the costs of investigations, reducing the impact of criminality on society.

Project research activities will last 3 years, from 1 August 2018 to 31 August 2021.

Purpose of data collection

The aim of the research activity is to evaluate the SPIRIT platform and provide feedback to the SPIRIT Consortium in three main areas: usability, analytical work and user satisfaction.

Types of data to be collected

Your personal data (name/surname) will be collected by the (*Add the name of the responsible of the research activity*). Data will be processed for the purpose of running the *evaluation research activity* within SPIRIT the SPIRIT platform and carrying out project activities only.

Personal data from the participants will be kept under the responsibility of the data controller, in this case the SPIRIT Coordinator, and will not be shared or transferred to other partners of the Consortium than those involved in the development of the research activity.

Personal data from individuals contained in the LEA databases or open source data gathered within the evaluation exercises will not be transferred to the SPIRIT technical partners at any time during or after the duration of the project. Any misuse resulting on such transfer will entail the immediate destruction of such data by SPIRIT Technical Partners.

LEA.....with regards to data mentioned above will act as data controller and data processor.

Privacy and confidentiality

Any personal or professional views or opinion you might express during the evaluation activity will be processed and rendered anonymous before dissemination within the SPIRIT Consortium partners. This implies that by no means the opinions or views you expressed will be related directly to your personal data in the final project deliverables. In other words, your opinions and views will be processed by in a way that inhibits tracing them back to you.

The results and feedback of the evaluation will be fully anonymised before sending them to the SPIRIT Consortium.

The SPIRIT partner responsible of the research activity will elaborate an English summary on the basis of the information gathered from the evaluation activities and send it to the rest of the SPIRIT Consortium. No personal data will be included in such summaries.

Personal data from voluntary participants in the evaluation activities will be erased after the end of the project except those data needed for auditing processes in front of the European Commission.

Data stored by LEAs will be subject to national legislation requirements and their own monitoring procedures.

The data controller will be responsible for ensuring the secure storage and subsequent destruction of the data.

Voluntary participation and right to withdraw

Your participation in the SPIRIT project is completely voluntary.

You are free to withdraw from the project, without giving a reason for your withdrawal and without any consequences to your future treatment within LEA.....

If you decide to withdraw from the project, please contact the SPIRIT contact person (s) provided in this document. In addition, you can contact the Data Protection Officer of the SPIRIT project (SPIRIT DPO).

You should know that you might be withdrawn from the project for any of the following reasons:

- If you don't follow the SPIRIT Consortium instructions on the evaluation activities
- If you don't attend the scheduled previous training sessions
- If you don't attend the scheduled evaluation sessions activities
- If the whole project is stopped for reasons not known now.

You retain all rights provided by the applicable data protection legislation, in any case:

- Access
- Information
- Rectification
- Erasure
- To be forgotten
- Restriction of processing

Potential Risks or inconveniences

There could be a risk that you may share some confidential information by chance, or that you may feel uncomfortable talking about some of the topics. If you say anything that you realise you do not want to be reported, you can inform the LEA responsible for research of the activity at any moment during the evaluation activity or when it is ended. All information provided will be treated in the strictest of confidence.

There shall be no attempt to recruit any participants with any incapacitating or disadvantaging conditions that may compromise their privacy or dignity.

Participants in whose case there may be any real or perceived power asymmetry in relation to anyone related to the recruiters and/or any other reason for lack of freedom of choice shall not be recruited.

Incentives

You will not be provided any incentive to take part in the SPIRIT evaluation activities.

Contact persons

In case of any issue involving you in your role as participant of this project, you are invited to inform:

- the SPIRIT project coordinator and contact person Paolo Fabbri-LUTECH SPA (Italy) via email: P.Fabbri@lutech.it
- the SPIRIT Data Protection Officer, Massimiliano Bellavista, via email: SPIRIT.dpo@lutech.it

Confirmation

Your participation within the research activities of the SPIRIT project is only possible if you freely and independently sign this consent.

I hereby declare:

- I am more than 18 years old and I am competent to provide consent
- I have been fully informed about the objectives of the SPIRIT Project.
- I understand that there is no compulsion to participate in the research activities of the project, so, if I freely and independently decide to participate, I may at any stage withdraw my participation
- I have read a document providing information related to the research and this consent. I have the chance to ask questions to the LEA responsible and other research staff and all my questions were answered to my satisfaction. I understand the objectives, the impact and the potential results of the SPIRIT research project that researchers provided to me.
- I agree that my data is to be used for scientific purposes and I have no objection that my data is published provided that it is completely anonymised.
- I understand that, no recordings will be replayed in any public forum or made available to any audience other than the current researcher team.
- I freely voluntarily agree to be part of this research study, without prejudice to my legal and ethical rights
- I understand that I may withdraw at any time without any consequences

- I understand that my participation is fully anonymous and that no personal details about me will be recorded, without my explicit consent.
- All information I provide will be treated as confidential. The *SPIRIT responsible partner of the evaluation and testing activity* will ensure to preserve my anonymity.
- LEA will provide only fully anonymised feedback related to the results of the evaluation activities
- I confirm that I have received training on previously to start the evaluation activities: i) the SPIRIT platform and SPIRIT technologies; ii) SPIRIT incidental findings policy; iii) privacy and data protection with regards SPIRIT technology implications.
- I have received a copy of this consent form

This consent form complies with the following relevant European and national laws and regulations. Specifically, this consent is compliance with:

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons regarding the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC.

Directive (EU) 2016/680 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 by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (OJ L 119, 4.5.2016, p. 89)

European Guidelines, Opinions and Recommendations by the European Data Protection Supervisor and the European Data Protection Board.

SPIRIT Data Protection Officer and SPIRIT Ethical Advisory Board recommendations, and opinions.

European Code of Conduct for Research Ethics

National legislation: (*Each LEA will introduce its national data protection, police legal framework and Police code of conduct*).

LUTHEC, SPA (Italy) is the data controller of SPIRIT project and requires this information for scientific purposes and will only process your personal and sensitive data in accordance with the current data protection legislation mentioned above.

By signing below, you accept to participate in the research according to the requirements explained above.

Name and surname of the participant:

Place, date:

Signature of the participant:

I have explained the nature and purpose of this procedure, the procedures to be undertaken and the risks that may be involved in the research activity. I have provided answers to all the questions received from the participant with regards the research activity and the SPIRIT project. The participant understands my explanation and has freely given informed consent.

Name and surname of the LEAs responsible of the evaluation activities:

Place, Date:

Signature of the LEAs responsible of the evaluation activities

5 Informed Consent Form for data processing in the context of test and demonstration activities of the project.

The UAB-IDT received from the technical partners a request for setting the legal and ethical framework for the collection of personal data from employees of the partners of the Consortium. In order to develop and display demo and test scenarios within the SPIRIT project, artificially generated data tests in the form of web sites is required.

Since these activities entail the collection of personal data, the UAB-IDT provided in Section 5 of D.9.5 a legal and ethical framework, as well as an Informed Consent Form specific to this activity both validated by the SPIRIT IEB.

The Informed Consent Form for data processing of the employees of the partners of the SPIRIT Consortium within the context of the test and demonstration activities is set out below:

Informed Consent Form for data processing in the context of test and demonstration activities of the SPIRIT Project.

PART I: Informed Consent Information Sheet

Informed Consent procedures

Ethical and legal issues related to research activities of the H2020 European project *SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities* (hereinafter also referred to as “SPIRIT”), coordinated by LUTECH SPA (Italy), are identified and defined herewith according to the European and national regulations in force. These ethical and legal issues have been analysed from the SPIRIT perspective and include/refer particularly to recruitment of participants, information to participants, informed consent and data handling during the planned research activities.

Before requesting consent, researchers shall ensure that participants have received written, and, if requested, additional oral information (and explanation). Researchers shall provide clear and understandable guidelines on the research activity.

In addition, participants should be given sufficient time to make an informed decision on the requested consent. Participants shall be informed that they are free to withdraw from participation

at any time, that their personal data will remain confidential and will not be made available to any third parties, and that collected data will be processed securing their data protection rights.

This information sheet provides to the participants detailed information on:

- purpose of the research and of the processing operations for which consent is given
- information about how to withdraw from the activity and/or request one's contribution to be removed from the test
- duration of the research activities
- possible risks, discomfort or disadvantages
- adopted procedures
- voluntary participation
- benefits, incentives to the subject or others
- data protection and confidentiality and privacy policies
- information on procedures related to their data and results at the end of the SPIRIT Project lifespan
- controller's identity
- information on SPIRIT Project contact persons

Ethics, privacy and data protection requirements

Ethical implications raised when conducting SPIRIT research activities will be addressed in strict compliance with the ethical and legal framework specifically identified for the project. Particularly, Regulation (EU) 2016/679 of 27 April 2016.

All data will be processed according to the European and national legal framework in force. All participants will receive proper information on the project objectives, expected results and limits of the research before giving their informed consent. In accordance with the nature of the project, specific information shall be provided to participants concerning the incidental findings policy designed.

The SPIRIT Ethics Advisory Board will provide guidance to the task leaders of the research activities if needed.

PART II: Informed Consent Document for data processing in the context of test and demonstration activities of the SPIRIT Project.

Introduction

You have been invited to take part in the H2020 European project “SPIRIT—Scalable privacy preserving intelligence analysis for resolving identities” (hereinafter also referred to as “SPIRIT”), coordinated by LUTECH SPA (Italy).

Before deciding on whether you want to participate or not, please read this document carefully.

Please ask all questions you may have so you can be completely sure that you understand all the proceedings of the research, including potential risks and benefits.

This informed consent document may include words that you do not understand. If this is the case, please ask the contact researcher or any other member of the research staff to fully explain the meaning of the word or clarify pieces of information.

At all times, the SPIRIT Project Consortium states its commitment to conduct all the research activities in strict compliance with the EU highest research ethical standards and the European and national privacy and data protection regulations.

About the project

The Internet has caused significant shifts in the patterns of criminal activity, enabling organised crime groups to access a large pool of victims, obscure their activities, and carry out a diverse range of criminal acts on a much larger scale than ever before. Frequently, these criminal activities are committed remotely and with anonymity, making detection and prosecution more complex than crimes that do not rely on the Internet and the virtualised modus operandi. Thus, for Law Enforcement and control agencies, the detection of identity fraud remains a complex task.

SPIRIT addresses the issues above by proposing a semantically rich sense-making set of tools aimed at detecting identity fraud patterns. This set of tools will enable complex associative searches over all sources relevant to the current investigation, correlate information from multimedia data, analyse information with certainty and structure and manipulate information into a unified view of the available evidence over a persisted, searchable knowledge base.

The final goal of the project is to empower the investigator to create a semantically rich picture over all the available evidence to be presented in court. This will, in the short term, improve collaboration between investigators and reduce investigation time, which will lead to crimes being solved more rapidly. In the medium term, LEA personnel will be provided with more efficient tools to assist in their

much specialised daily work. In the longer term, the more rapid solving of crimes will reduce the costs of investigations, reducing the impact of criminality on society.

Project research activities will last 3 years, from 1 August 2018 to 31 August 2021.

Purpose of data collection

The aim of the data collection is to gather personal data from researchers or employees of the organisations of the SPIRIT Consortium for internal test and evaluation purposes.

As researcher or employee of one of the SPIRIT organisations that comprise the SPIRIT Consortium you are being invited to take part in this research activity providing your personal data purely on a voluntary basis.

This activity is included in Task T03.03 Research Dataset Setup and maintenance (Task lead: AES - Participants: LTEC, LIU, LPA, WSPOL, WMU, TVP, SERB, HBP). It consists on generating an artificial test data set in the form of web sites using personal data provided by the researchers/employees of the SPIRIT Consortium organisations.

Types of data to be collected

Your personal data (image and voice on photographs and or videos, personal vehicles, name, surname and email address) will be collected by the task leader of the activity Fraunhofer IDMT. Personal data will be processed exclusively for the purpose of generating an artificial data set for developing test scenarios and showcase demonstrations within SPIRIT. Personal data from the participants in this research activity will be uploaded via a secure connection web to a secure server at the premises of Fraunhofer IDMT, acting as data processor, and kept under the responsibility of the data controller, the SPIRIT coordinator. Your personal data will not be shared or transferred to partners others than those directly involved in the development of the research activity. Only a small and clearly identified group of persons will have access to these datasets.

Each person uploading data will be located in a secure personal upload area that only he/she can access. In order to get an update link it will be necessary to send a request to this email address: christian.weigel@idmt.fraunhofer.de

Your data will be stored securely and confidentially until the project activities have been completed (31 August 2021). Datasets will never be publicly displayed or publicly available.

Privacy and confidentiality.

Any photograph, picture and video provided and uploaded for development and demonstration purposes will undergo a semi-automatic visual anonymization process when they are used for public demonstration purposes. It entails that any face or number plate that is not matching in the reference pictures and information used for performing the search will irreversibly be made unrecognizable by using black boxes.

In terms of using such data only for internal test and evaluation purposes, no anonymization processes will be applied. The knowledge gained, shall be anonymised and/or after specific authorization from the data subject. If so, such knowledge can be published in accordance with the research objectives of the SPIRIT project.

The personal data can be used in official SPIRIT demonstrations within the confines of work package 10 and in formal reviews to representatives of the SPIRIT LEAs and the SPIRIT Consortium, as well as ethical reviewers and representatives of the funding institution: the European Research Agency and the European Commission.

The SPIRIT Consortium partner whom sees/accesses this information will keep it confidential. Nothing of the personal data provided will be handed to third parties.

The knowledge gained in this research activity will not be used for commercial purposes and can only be used within the confines of the research within the SPIRIT project without written permission from the data subject.

All personal data provided by the participants will be securely stored in the terms described in the section above and will not be made available to any person outside of the SPIRIT Consortium partners.

The authorization for the use and access of this information is valid until the end of the project unless you decide to cancel it before.

On completion of the research, all such personal data will be deleted from all systems used for developing testing and demonstrations by members of the SPIRIT Consortium. The SPIRIT DPO and the SPIRIT EAB will be in charge of monitoring delating operations.

Voluntary participation and right to withdraw

Your participation in this research activity is completely voluntary.

You are free to withdraw from the research activity, without giving a reason for your withdrawal and without any consequences to your future treatment by the researcher and your organisation. If you decide to withdraw from the research activity, please contact the SPIRIT contact person(s) provided in this document. In addition, you can make contact with the Data Protection Officer of the SPIRIT project (SPIRIT DPO).

You should know that you might be withdrawn from the research activity for any of the following reasons:

- If you don't follow the SPIRIT Consortium instructions
- If you don't attend the scheduled data collection sessions
- If the whole project is terminated for reasons not known now

You retain all rights provided by the applicable data protection legislation, in any case:

- Access
- Information
- Rectification
- Erasure
- Right to be forgotten
- Restriction of processing

Potential Risks or inconveniences

There could be a risk that you may share some confidential information by chance, or that you may feel uncomfortable talking or providing some of your personal data. If you say anything that you realise you do not want to be reported, or if you decide not sharing some of personal data provided, you can inform the responsible research of the activity at any moment or when it is ended. All information provided will be treated in the strictest of confidence.

Incentives

You will not be provided any incentive to take part in this research activity.

Contact persons

In case of any issue involving you in your role as participant of this project, you are invited to inform:

- the SPIRIT project coordinator and contact person Paolo Fabbri-LUTECH SPA (Italy) via email: **P.Fabbri@lutech.it**
- the SPIRIT Data Protection Officer via email: Massimiliano Bellavista at **SPIRIT.dpo@lutech.it**

Confirmation

Your participation within this research activity of the SPIRIT project is only possible if you freely and independently sign this consent.

In the context of this research activity Personal Data means image and voice (in photographs and videos for the dataset), and email, name and surname (in writing for the Informed Consent Form).

I hereby declare:

- I am 18 years older and I am competent to provide consent
- I have been fully informed about the objectives of the SPIRIT Project and in particular on the purposes of this research activity.
- I understand that there is no compulsion to participate in this research activity, so, if I freely and independently decide to participate, I may at any stage withdraw my participation
- I have read a document providing general information about the project and specific information on the purpose and content of this research activity and this consent. I had the chance to ask questions to the researches in charge of such research activity and all my questions were answered to my satisfaction. I understand the objectives, the impact and the potential results of the SPIRIT research project and in particular, of this research activity that researchers provided to me.
- I agree that my personal data is to be used for scientific purposes and I have no objection that my data is published, providing that it is completely anonymised
- I mandate that all personal data provided by me must be securely stored and not made available to any person or organisation outside of the SPIRIT project.
- I mandate that any information (written, verbal, audio, picture, video or in any other form) obtained relating to the data mention above will remain confidential and within the confines of the SPIRIT research.(the same)

- I mandate that information gathered from processing my personal data will not be released to, nor discussed with anyone not connected with the SPIRIT project, or duly authorised by the SPIRIT Consortium.

- Personal data and any knowledge gained within the context of this research activity will not be used for commercial purposes and can only be used as mentioned before within the confines of the SPIRIT project without my written permission.

- The knowledge gained, anonymised and /or after specific authorisation by me as data subject, can be published in accordance with the research objectives of the SPIRIT project.

- On completion of the research, I mandate that all personal data concerning me will be erased from all the systems used for developing, testing and evaluation research activities by members of the SPIRIT Consortium.

- I understand that personal data that I provide may be used in official SPIRIT demonstration within the confines of work package 10 and formal reviews to representatives of the SPIRIT LEAs and the SPIRIT Consortium, as well as ethical reviewers and representatives of the funding institutions: the European Research Agency and the European Commission.

- I confirm that I have received a copy of this consent form

This consent form complies with the following relevant European and national laws and regulations. Specifically, this consent is compliant with:

Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons about the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC; European Guidelines, Opinions and Recommendations by the European Data Protection Supervisor and the European Data Protection Board; European Code of Conduct for Research Ethics.

LUTECH SPA (Italy) is the data controller of SPIRIT project, requires this information for scientific purposes, and will only process your personal and sensitive data in accordance with the current data protection legislation.

By signing below, you accept to participate in this research activity according to the requirements explained above.

Name and surname of the participant:.....

Place, date:.....

Signature of the participant:.....

I have explained the nature and purpose of this procedure, the procedures to be undertaken and the risks that may be involved in the research activity. I have provided answers to all the questions received from the participant with regard to the research activity and the SPIRIT project. The participant understands my explanation and has freely given informed consent.

Name and surname of the researcher:.....

Place, Date:.....

Signature of the researcher:.....

6 Informed Consent training activities

The ethical lead partner (UAB-IDT) conducted a training session for reinforcing ethical and legal compliance with the data protection framework identified for the project in the context of the SPIRIT end users first training sessions held in Rome between 21 and 22 October 2019 lead by CEPIC.

One of the aims of the training session was to highlight some key aspects related to data protection in SPIRIT. To that end, procedures related to get informed consent when developing evaluation activities in the course of the research activities foreseen for the project were revisit in-depth with the SPIRIT end users.

The ethical lead partner recalled the nature of the informed consent as a key legal requirement to ensure compliance with the EU data protection legislation. Moreover, informed consent forms templates provided for conducting different research activities were analysed and recalled focussing on the different nature of such templates according to the research activities for which they have been designed.

From a practical perspective, the ethical lead partner provided specific guidelines on how to proceed when dealing with the informed consent requirement in the context of the evaluation activities that will be conducted in the SPIRIT end users' facilities.

Figure 1 shows the three steps to be taken by the SPIRIT end users' in the context of developing evaluation activities regarding the need of gathering the informed consent form:

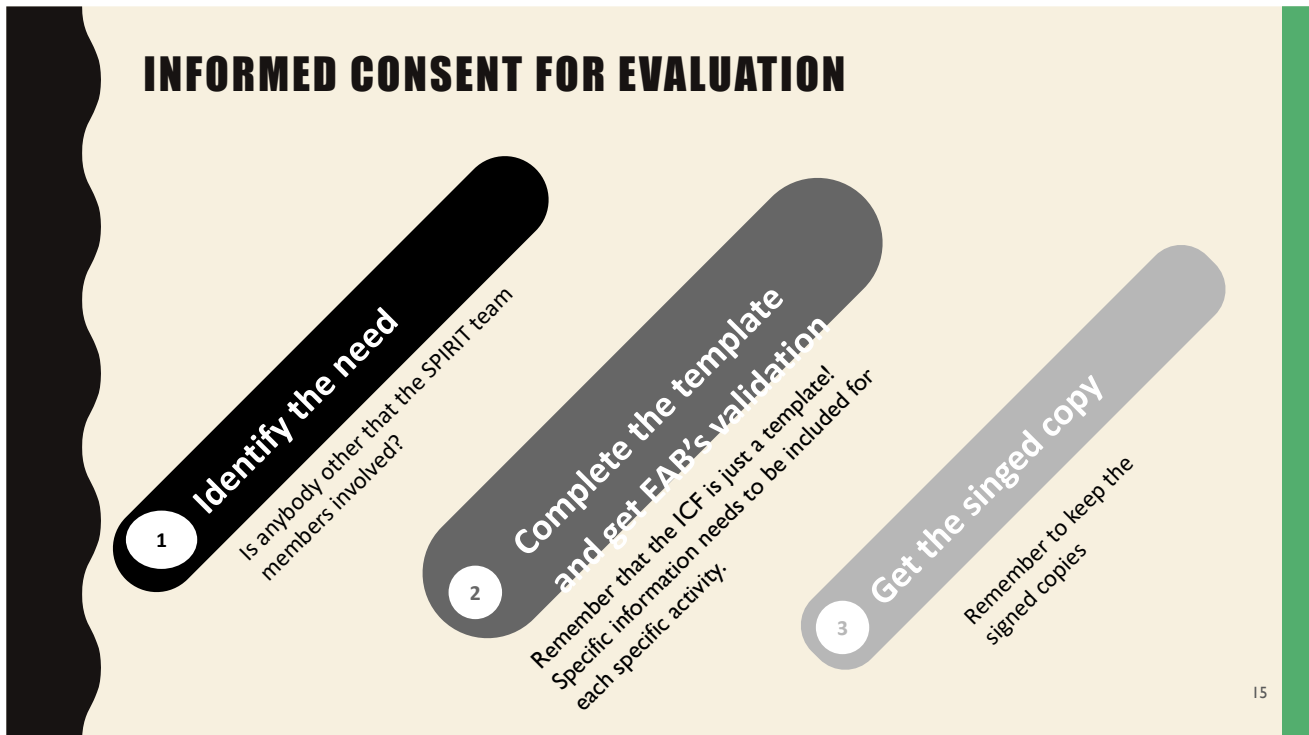


Figure 1: Steps to be taken by the SPIRIT end users when dealing with the informed consent requirement in the context of the evaluation activities of the project.

To sum up, the three steps shown in Figure 1 were explained to the SPIRIT end users as follows:

1. The need to identify when it is necessary to provide informed consent forms when conducting evaluation activities. As a general rule, the end users were informed about the need of providing informed consent forms when participants in the evaluation activities are not part of the SPIRIT end user official team members.
2. Once the need of getting informed consent forms to the participants is clearly identified, the SPIRIT end user should adapt the informed consent template provided by the ethics lead partner of the project. This step entails: i) to include specific and detailed information in relation with the research activity to be conducted; ii) to send the adapted informed consent form before to be signed by the participants to the IEB to get their approval.
3. The importance to keep signed copies of the informed consent forms for auditing purposes.

The full content of the training session will be found on D.9.5.



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Technologies for prevention, investigation, and mitigation in the context of fight against crime and terrorism

www.spirit-tools.com



Horizon 2020
European Union funding
for Research & Innovation

7 References

Charter of Fundamental Rights of the European Union. Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:12012P/TXT>

Directive (EU) 2016/680 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 by competent authorities for the purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, and on the free movement of such data, and repealing Council Framework Decision 2008/977/JHA (OJ L 119, 4.5.2016, p. 89). Available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1540899685120&uri=CELEX:32016L0680>

European Code of Conduct for Research Integrity. Available at: https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf

Guidelines on Consent under Regulation 2016/679 (wp259rev.01), Article 29 Working Party. Available at: http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=51030

Guidelines on Transparency under Regulation 2016/679 (wp260rev.01), Article 29 Working Party. Available at: http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=51025

Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679 (wp251rev.01), Article 29 Working Party. Available at: http://ec.europa.eu/newsroom/article29/document.cfm?action=display&doc_id=49826

Handbook on European data protection law (2018 edition), European Union Agency for Fundamental Rights and Council of Europe, European Court of Human Rights, European Data Protection supervisor. Available at: http://fra.europa.eu/sites/default/files/fra_uploads/fra-coe-edps-2018-handbook-data-protection_en.pdf

H2020 Programme: Guidelines on FAIR Data Management in Horizon 2020, European Commission – Directorate-General for Research and Innovation. Available at: https://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/oa_pilot/h2020-hi-oa-data-mgt_en.pdf

Horizon 2020 Programme. Guidance on How to complete your ethics self-assessment (v6.0), Directorate-General for Research and Innovation. Available at: https://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/ethics/h2020_hi_et_hics-self-assess_en.pdf

Modernised Convention for the Protection of Individuals with Regard to the Processing of Personal Data, Council of Europe, CM/Inf (2018)15-final. Available at:

https://search.coe.int/cm/Pages/result_details.aspx?ObjectId=09000016807c65bf

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 (OJ L 119, 4.5.2016, p. 1)

Annex I – English Summary Template

Below is the template to be used for drafting the English summary of each activity. The given structure contributes to enhancing conformity, consistency and clarity across the different English summaries the Project will be collecting. In particular:

- **Keywords:** please identify significant words that help to specify relevant concepts/arguments/topics that emerged in the activity and that you summarise.
- **Arguments:** text to be drafted in the “arguments column”. It needs to be a narrative text (structured by main points), or a kind of essay that explains the concerned concept/argument/topic that emerged from the activity.

<i>Example question:</i>	
Lack of functionalities	On top of that there is a general lack of software that can be used ... more functionalities should therefore be developed. These functionalities should focus on
Involvement of the private sector	...

ENGLISH SUMMARY TEMPLATE

Date: _____ Place: _____	
Activity coordinator	Activity participants
Surname, name: _____ Partner: _____	Surname, name: _____, (if explicitly consented) Affiliation: _____
	Surname, name: _____, (if explicitly consented) Affiliation: _____

<i>Question 1:</i>	
<i>Keyword 1</i>	<ul style="list-style-type: none"> • Argument 1.a • Argument 1.b • Argument 1.c •

<i>Keyword 2</i>	<ul style="list-style-type: none"> • Argument 2.a • Argument 2.b • ...
<i>[add other if necessary]</i>	...
Question 2:	
<i>Keyword 1</i>	<ul style="list-style-type: none"> • Argument 1.a • Argument 1.b • Argument 1.c •
<i>Keyword 2</i>	<ul style="list-style-type: none"> • Argument 2.a • Argument 2.b • ...
<i>[add other if necessary]</i>	...
Question 3:	
<i>Keyword 1</i>	<ul style="list-style-type: none"> • Argument 1.a • Argument 1.b • Argument 1.c •
<i>Keyword 2</i>	<ul style="list-style-type: none"> • Argument 2.a • Argument 2.b • ...
<i>[add other if necessary]</i>	...

Annex II – EAB Deliverable approval



Monday 29th October 2018

TO WHOM IT MAY CONCERN

Dear Sir/Madam

EUROPEAN UNION SPIRIT PROJECT

I hereby declare that I have read, and I accept the outcomes of the deliverables foreseen for M3 carried out in the European Union SPIRIT Project, including docs D9.1 on the Informed Consent, D9.2 on the Incidental Findings, D9.3 on the Ethics Advisory Board and D9.4 on Notification to National Data Protection Authorities.

The Project has successfully completed this round of deliverables in strict accordance with rules and principles of the General Data Protection Regulation (EU) 2018/679 (GDPR) and Directive (EU) 2016/680.

Please let me know if I can be of further assistance.

Yours sincerely,



Ugo Pagallo
Professor of Jurisprudence at the Department of Law,
University of Turin,
Turin, Italy



Monday 29th October 2018

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Please let me know if I can be of further assistance.

Yours sincerely,



Lilian Mitrou
Professor at Department of Information and
Communication System Engineering,
University of the Aegean, Greece



© 2018 SPIRIT ALL RIGHTS RESERVED

Monday 29th October 2018**TO WHOM IT MAY CONCERN**

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Please let me know if I can be of further assistance.

Yours sincerely,



Virginia Dignum
Full Professor at Department of Computing Science,
Umeå universitet, Sweden



© 2018 SPIRIT ALL RIGHTS RESERVED

Monday 29th October 2018**TO WHOM IT MAY CONCERN**

Dear Sir/Madam

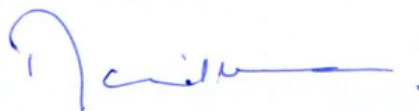
EUROPEAN UNION SPIRIT PROJECT

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Please let me know if I can be of further assistance.

Yours sincerely,



David Watts
Professor of Information Law and Policy
La Trobe Law School,
La Trobe University, Australia



Monday 29th October 2018

TO WHOM IT MAY CONCERN

Dear Sir/Madam

EUROPEAN UNION SPIRIT PROJECT

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The Project has successfully completed this round of deliverables in strict accordance with rules and principles of the General Data Protection Regulation (EU) 2018/679 (GDPR) and Directive (EU) 2016/680.

Please let me know if I can be of further assistance.

Yours sincerely,



Giovanni Sartor
Full Professor in Legal Informatics-Computers and Law
at University of Bologna,
Bologna, Italy