



D8.2 POPD - REQUIREMENT NO. 2

DATA MANAGEMENT PROTOCOL ON PERSONAL DATA

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1. Introduction

This document informs members of community of practice and stakeholder being involved in the H2020 I AM RRI research project on the protection of their personal data taking into account the following process steps: collection of data, storage, protection, retention, destruction, and confirmation that they comply with national and EU legislation.

During the project duration of the H2020 I AM RRI project several types of personal data will be collected and processed in order to develop a comprehensive knowledge and understanding on the webs of innovation and value chains of additive manufacturing under consideration of responsible research innovation (RRI). This project related knowledge base will allow a better understanding what has been advantageous and what hampering to the development of innovation value chains in the area of additive manufacturing under consideration of RRI. It will also provide the context for a bottom-up integration of the gained project results into future additive manufacturing innovation value chains.

The protection of personal data according to the Regulation EU 2016/675 is given high priority in the I AM RRI project.

The Data Management Protocol on personal data (DMP; present document) aims to provide an overview of principles and guidance in relation with protecting the confidentiality of personal data like:

- Collection and processing the personal data only for the project specified purposes;
- process the data only in relation with the purposes for which the data was initially provided;
- keep personal data safe and secure;
- keep data accurate, complete and up-to-date;
- retain it no longer than it is absolutely necessary for the specified purpose, and,
- provide a copy of his/her personal data to any individual person, on request.

In I AM RRI, only truly necessary personal data will be collected and processed. These may include: data on stakeholders, meetings with, workshops with and surveys with participants. The received data will be only retained for the project purpose and compiled into a central database. All storage aspects will be fully compliant with national and EU legislation, for example there will be no opportunities to identify individual responses to possible surveys or interviews. In addition, collected information will not be used or made available for another reason, without additional permissions.

Another purpose of this document is to assist project partners in implementing project related procedures that will ensure that personal data in their possession is kept absolutely safe and secure.

It is for this reason that the document is divided into subsequent chapters:

- Personal data definition
- Purpose of data collection and pseudonymisation
- Ethical and legal framework
- Data management procedures

2. Personal Data Definition

Personal Data: are defined as “any information relating to a natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one of more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that natural person”.

Within the I AM RRI project the personal data of stakeholders and members of community of practise in additive manufacturing will be collected. These data include name, contact address, organization, age, gender, education and job experience.

3. Purpose of data collection and pseudonymisation

In I AM RRI data will be only collected in order to achieve the following objectives:

1. Describing the web of innovation value chains mainly in a qualitative way;
2. Getting data in order to test and validate the numerical model of innovation value chain;
3. Build up knowledge base on the web of innovation value chains on the examples of additive manufacturing;
4. Initiation of institutional change by workshop discussion with stakeholder and member of community of practise.

The key purpose is to get representative information on the webs of innovation value chain. For data analysis & evaluation the personal data is going to be dealt in an anonymised way so that it cannot be traced back to an identifiable natural person, but may retain criteria relevant for the analyses such as gender, age, job experience, cultural background etc.

4. Ethical and Legal Framework

The general data protection regulation 216/679 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 came into force on 25 May 2018. This regulation shall be binding in its entirety and directly applicable in all Member States.

Additionally the general principles on ethical standards and guidelines defined in relation with Horizon 2020 projects will be followed in the I AM RRI project. The associated main provisions from the I AM RRI Grant Agreement are listed below:

- **Article 18 – KEEPING RECORDS – SUPPORTING DOCUMENTATION**

- **Article 18.1.1 Records and other supporting documentation on the scientific and technical implementation**

- The beneficiaries must keep records and other supporting documentation on scientific and technical implementation of the action in line with the accepted standards in the respective field.

- **Article 34 – ETHICS AND RESEARCH INTEGRITY**

-The beneficiaries must respect the highest standards of research integrity – as set out, for instance in the European Code of Conduct for Research Integrity.¹.....

- **Article 39 – PROCESSING OF PERSONAL DATA**

- **Article 39.2 Processing of personal data by the beneficiaries**

- The beneficiaries must process personal data under the agreement in compliance with applicable EU and national law on protection (including authorisations or notification requirements).

- The beneficiaries may grant their personnel access only to data that is strictly necessary for implementing, managing and monitoring the agreement.

- The beneficiaries must inform the personnel whose personal data are collected and processed by the Agency or the Commission. For this purpose, they must provide them with the privacy statement(s), before transmitting their data to the Agency or the Commission.

¹ The European Code of Conduct for Research Integrity of ALLEA (All European Academics) and ESF (European Research Foundation) of March 2011.

http://ec.europa.eu/research/participants/data/ref/h2020/other/hi/h2020-ethics_code-of-conduct_en.pdf

Within the I AM RRI project there will be no collection and processing of sensitive personal data that could reveal any political opinions, religious or philosophical attitudes/values nor any data concerning health or sex-life.

All stakeholders attending I AM RRI events or answering questionnaires will be recruited for the I AM RRI activities fully on a voluntary basis by spreading invitations to the European additive manufacturing community. Some general basic information material on the I AM RRI project activities will be provided to all interested stakeholders. Informed consent is a mandatory prerequisite in all I AM RRI project activities. Stakeholders which participate in I AM RRI interviews and other project activities will be asked to sign the informed consent form which clearly describes:

- a) the purpose of the I AM RRI project activities,
- b) what data is collected,
- c) how it is used by whom, and
- d) who is responsible for updating or deleting the personal data.

Personal data will be exclusively collected for contacting suitable stakeholders representing a representative European perspective in the additive manufacturing field. Responses will be anonymised (“pseudonymisation”) during the processing, so that they cannot be traced back to an identifiable natural person, but may retain criteria relevant for the analyses such as gender, age, job experience, etc.

4.1 Additional Local Legislation of countries involved within I AM RRI

Norway

Norway has drafted a proposal for a new national data protection legislation that will incorporate the GDPR. The proposal has not yet been presented to the Norwegian Parliament for approval the implementation may be slightly delayed. It is expected that the new legislation will mainly implement GDPR in 2018.

5. Data management procedures

5.1 Data collection

Before collecting any personal data the involved human participants have to give their consent. For that several templates are provided.

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When online survey tools are going to be used the consent templates be included in the survey. Each project partner will collect personal data and will be responsible for the process of data collection, storage, protection, retention and destruction. On the consent template persons being in charge of data management are mentioned. Each human participant will get a copy of the signed consent paper. Responsibility on data collection for digital surveys is the project coordinator Montanuniversitaet Leoben.

5.2 Data storage and security

All collected data will be transferred via encrypted data link to a central project server within a period of 14 days after collection. Locally stored data will be deleted within a period of 14 days. No freeware clouds or any other free software storage will be used, so that it can be assured that only project partners have access to collected personal data.

The collected data is stored on password protected areas/devices and will not be used or made available, for any other reason, without additional permissions. Public project deliverables will contain names and organisational information of project team members involved in the set-up of project deliverables, but publishing that personal information does not create any risks to anyone.

Persons who stop being involved in the project activities will no longer have access to the central project server. All project team members will be instructed to act in line with the GDPR regulations.

All stored data within the project will be used in a “pseudonymised” manner as in GDPR 2016/679 Article 4 Def. 5.

5.3 Transfer to third parties and Non-European Member States

The collected original personal data will not be transferred to any third party especially not for any commercial use. As already mentioned in the introductory section of this document the collected personal data will not be used for any other purpose than the project research work. In the rare case that a third party needs to get involved in the project activities than this third party will have to accept the GDPR and project documents on data management.

5.3.1 Web based survey

For the surveys a web based licenced platform is used. This software tool is offered by a European company acting also under the GDPR. Personal data collected within the surveys are transferred to the central project server after the survey is closed and deleted from the web based survey platform.

5.3.2 Data transfer from and to Norway

One project partner is from Norway. According to the Grant Agreement and the Consortium Agreement they follow the rules of this document POPD and the Data Management Plan.

5.4 Retention and destruction

All direct personal data will be stored safe and secure until the final approval of the final project results by the EC and deleted within one month after the approval. Pseudonymised data will be kept for further research.