



Zero PM

Zero pollution of Persistent, Mobile substances

Grant Agreement No. 101036756

Deliverable 9.3



December 2021

POPD - Requirement No. 3

Work Package 9 – Ethics

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Revision: 0 – Draft
Dissemination level: Confidential



This project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No. 101036756.

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The present document has not yet received final approval from the European Commission and may be subject to changes.



Summary

This report describes the measures taken by the H2020 ZeroPM consortium to ensure compliance of project activities with ethics requirement No 3 (POPD – Protection of personal data). The ZeroPM host institution (Stiftelsen Norges Geotekniske Institutt (NGI)) is not required to appoint a data protection officer under the GDPR. There are three beneficiaries in ZeroPM (Universitat Wien, Milieu Consulting and the International Chemical Secretariat) who will work with personal data. These beneficiaries will ensure appropriate technical and organisational measures are taken to safeguard the rights and freedoms of research participants in relevant tasks. All necessary documentation will be kept on file and submitted upon request.



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1 Summary

This report describes the measures taken by the H2020 ZeroPM consortium to ensure compliance of project activities with ethics requirement No 3 (POPD – Protection of personal data).

2 Data Protection Policy

The ZeroPM host organisation (Stiftelsen Norges Geotekniske Institutt (NGI)) is not required to appoint a data protection officer under the GDPR for the following reasons:

- ▼ NGI itself will not collect or process personal data;
- ▼ Sharing of personal data between beneficiaries will take place in an anonymized form (to the widest extent possible) thus not containing any personal identifiable data and consequently not be subject to GDPR;
- ▼ According to the ZeroPM consortium agreement, each beneficiary will adopt the role of independent data controller in relation to any personal data processed by that beneficiary.

All personal data will be stored and treated on certified platforms and GDPR compliant EU based servers by the beneficiary.

3 Safeguarding the rights and freedoms of research participants

Beneficiaries Milieu Consulting, Universitat Wien and International Chemical Secretariat will carry out activities including several of the following; interviews, surveys and workshops, whereby personal information will be collected. Information about the methods used to safeguard the rights and freedoms of the research participants by these beneficiaries are given below.

3.1 Transparency and providing information

When personal data is collected directly from a research participant they will be provided with a Privacy Statement (e.g. data protection notice) including the following: name and contact details of the controller and its data protection officer, purpose(s) of processing, legal basis for processing and in case of legitimate interests also description of such interests, any possible recipients of the personal data, information on a possible transfer of personal data to third country or an international organization and reference to the appropriate or suitable safeguards, retention period and the list of data subject's rights, in particular their right to withdraw the consent and the right to lodge a complaint with a supervisory authority, and the existence of any automated decision-making.



3.2 Milieu Consulting

Milieu Consulting will use technical and organisational measures to safeguard the rights and freedoms of the research participants. Personal data will be processed in an anonymised form and all staff working on ZeroPM will use Milieu's office equipment (hardware and software) when processing such data. A stringent password policy is enforced and disposal of personal data is controlled. Online storage of personal data is only allowed if such data is not accessible for people or systems not belonging to the project. The data minimization principle is used and processing of special categories of personal data (e.g. data on religion, sexual orientation, race, ethnicity) shall be avoided. Stakeholders will be made aware of their rights and the potential risks that the data processing may bring and a Privacy Statement will be used prior to data processing. Consent must be collected before personal data is used and while processing personal data from stakeholder(s), such data shall not be made available to other third parties outside of the project without the stakeholders' explicit consent. In case a research participant makes a request to exercise his or her rights under data protection legislation, the Milieu Consulting team shall immediately inform the other ZeroPM beneficiaries and Milieu data protection team in order to respond to the data subject's request within applicable time.

3.3 Universitat Wien (UniVie)

Universitat Wien will use technical and organisational measures to safeguard the rights and freedoms of the research participants. Personal data will not be used for any other purpose than that defined in the description of action and the data will be stored in line with current GDPR protocols. UniVie has dedicated data protection officers who can be contacted at: datenschutzbeauftragter@univie.ac.at. Recordings of interviews to be carried out by UniVie will be made, however these will be destroyed following transcription and the transcripts will be anonymised. For all data, only authorized researchers on the project will have access to the data as stored on password protected, secure servers within the European Economic Area, with data encryption for sensitive data, in line with current GDPR protocols.

3.4 International Chemical Secretariat (ChemSec)

ChemSec will use technical and organisational measures to safeguard the rights and freedoms of the research participants. ChemSec will only collect and store personal data that is needed, essential and compatible with the activities in the description of action of ZeroPM. ChemSec. ChemSec has a dedicated data protection officer who can be reached at: GDPR@chemsec.org.



4 Documentation

NGI will keep its detailed data protection policy for ZeroPM on file and submit it to the REA upon request. Details of the technical and organisational measures implemented to safeguard the rights and freedoms of the research participants by relevant beneficiaries, as well as details for the respective data protection officers will be kept on file and submitted to the REA upon request.





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