

# HACID - Deliverable

# Ethics Check Report

This project has received funding from the European Union's Horizon Europe research and innovation programme under Grant Agreement No. 101070588. UK Research and Innovation (UKRI) funds the Nesta and Met Office contributions to the HACID project.

<b>Deliverable number:</b>	D1.9
<b>Due date:</b>	30.11.2022
<b>Nature<sup>1</sup>:</b>	R
<b>Dissemination Level<sup>2</sup>:</b>	PU
<b>Work Package:</b>	WP1
<b>Lead Beneficiary:</b>	CNR
<b>Contributing Beneficiaries:</b>	

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<sup>1</sup> The following codes are admitted:

- R: Document, report (excluding the periodic and final reports)
- DEM: Demonstrator, pilot, prototype, plan designs
- DEC: Websites, patents filing, press & media actions, videos, etc.
- DATA: Data sets, microdata, etc.
- DMP: Data management plan
- ETHICS: Deliverables related to ethics issues.
- SECURITY: Deliverables related to security issues
- OTHER: Software, technical diagram, algorithms, models, etc.

<sup>2</sup> The following codes are admitted:

- PU – Public, fully open, e.g. web (Deliverables flagged as public will be automatically published in CORDIS project's page)
- SEN – Sensitive, limited under the conditions of the Grant Agreement
- Classified R-UE/EU-R – EU RESTRICTED under the Commission Decision No2015/444
- Classified C-UE/EU-C – EU CONFIDENTIAL under the Commission Decision No2015/444
- Classified S-UE/EU-S – EU SECRET under the Commission Decision No2015/444

# Document History

<b>Version</b>	<b>Date</b>	<b>Description</b>	<b>Author</b>	<b>Partner</b>
0.1	16.11.2022	Creation	Vito Trianni	ISTC-CNR
1.0	29.11.2022	Final Revision	Vito Trianni	ISTC-CNR

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In this report, we provide a first response to the requirements from the Ethics check, following the requests for clarification provided by the EC. These are mainly about personal data and the existence of non-EU countries within the consortium. These two aspects are addressed separately below.

## 1. Personal Data

The following requests for clarification have been received:

- The description states that a minimum amount of personal data is collected and processed. Clarifications need to be provided on the types of personal data collected and processed.
- The beneficiary must confirm that it has appointed a Data Protection Officer (DPO) and the contact details of the DPO are made available to all data subjects involved in the research. For beneficiaries not required to appoint a DPO under the GDPR, a detailed data protection policy for the project must be submitted.

Within the HACID project, data collection practices are treated in respect to the relevant European and national legislations (GDPR, General Data Protection Regulation n. 2016/679). A Data Protection Officer (DPO) is appointed for the project, and corresponds to the DPO of CNR: dott. Raffaele Conte (rpd@cnr.it, protocol n. 103/2020 on October the 15th, 2020). Local support at ISTC-CNR on data protection is given to the project coordinator and the CNR activities by Giorgia Lodi (giorgia.lodi@istc.cnr.it, protocol n. 34/2021 on February the 2nd, 2021), the privacy reference point of ISTC-CNR, a role that represents a connection between the institute and the mentioned DPO.

Considering that all partners are involved at least as data processors, a Joint Controller Agreement is being prepared as an annex to the consortium agreement to clarify the respective roles in the personal data processing, if any.

In any case, all the organisations of the project appointed a DPO:

- For MPG, the DPO is Thomas Feg (feg@mpib-berlin.mpg.de).
- For Human Dx Eu, the DPO is Irving Lin ([irving@humandx.org](mailto:irving@humandx.org)).
- For Nesta, the DOP is Mathew Dillon (matthew.dillon@nesta.org.uk).
- For MET Office, the DPO is Lian Talbot (legal@metoffice.gov.uk).

Following the experiments with volunteer subjects, a small amount of demographic data could be stored and processed (e.g., age and gender, profession). A privacy statement together with an explicit consent to the processing of the personal data will be distributed among data subjects. In this documentation, a clear indication of the DPO contact information is given together with all the details regarding the participant rights as regulated by GDPR.

The collected data are minimised to serve the sole goals of the project. We will proceed with pseudonymisation of all the personal data, keeping separate electronic records of the data and the direct identifiers on different secure servers located at the premise of the beneficiary collecting the data, following data management best practices. A monthly backup will ensure that data is not lost or corrupted.

The pseudonymisation records will be maintained for a period of 5 years after data collection. Within this timeframe, participants are allowed to exercise their right of oblivion.

Afterwards, the pseudonymisation records are destroyed, hence making the experimental data fully anonymous.

## 2. Non-EU Countries

The following request for clarification has been received:

- Human participants for the climate service case will be selected from the UK Met office—a non-EU country—as well as one of the evaluators (NESTA), therefore the beneficiary must provide details on the personal data which will be imported to/exported from EU and confirm that the adequate authorizations have been obtained and are kept on file.

Considering that two partners are UK based, a data import/export issue could be raised. Given the planned experimentation, no data will be exported from the EU to the UK, but the collected data could be imported as some participants are recruited in the UK. However, only pseudonymised data will be imported. Participants will be informed about that, and a corresponding consent will be collected. Moreover, the import of data will be done in the frame of the recently published adequacy decision for the UK.

Details about the procedures for importing data from the UK are provided in the Joint Controller Agreement mentioned above, as well as in the Data Management Plan.