

D6.1 – POPD – Requirement No. 1

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CLIMOP Consortium

CLIMOP Consortium consists of a well-balanced set of partners that cover all the needed competencies and the whole value chain from research to operations. ClimOp Consortium includes representatives from aviation industry (IATA, SEA), academic and research institutes (NLR, DLR,TU-Delft, ITU) and SMEs (DBL, AMIGO).

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Executive summary

The deliverable presents the procedures followed by the CLIMOP Consortium to ensure compliance with the ethics requirement n.1 set out in WP6: The beneficiary must explain how all of the data they intend to process is relevant and limited to the purposes of the research project. A description of the technical and organisational measures that will be implemented to safeguard the rights and freedoms of the data subjects/research participants must be submitted as a deliverable.



1. Protection of Personal Data

1.1. Compliance with legislation and Guidelines

CLIMOP research activities will be compliant with the principles of dignity, freedom, equality, solidarity, citizens' rights and justice as stated in the Charter of Fundamental Rights of the European Union. When processing personal data for the CLIMOP project, we will use particular care to privacy and data protection rights, considering them as fundamental rights to be protected.

In particular, the CLIMOP Consortium will ensure the ethical and legal compliance with current regulations:

- the EU Charter of Fundamental Rights (artt. 7 and 8);
- the European Convention for the Protection of Human Rights and Fundamental Freedoms (art. 8);
- the General 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 (GDPR);
- the Directive on Privacy and Electronic Communications (2002/58//EC);
- the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data No.108/1981;
- the Article 29 WP Guidelines on Consent under Regulation 2016/679 (wp259rev.01):
- the Article 29 WP Guidelines on Transparency under Regulation 2016/679 (wp260rev.01);
- the Article 29 WP Opinion 05/2014 on Anonymization techniques (wp216);
- the Article 29 WP Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679(wp251rev.01).

1.2. Definitions

According to the definitions contained in Articles 4 and 9 of the GDPR, from now on we will refer to:

Personal data as any information relating to an identified or identifiable natural person (data subject); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

In its stakeholders' consultation and dissemination activities the CLIMOP Consortium will process, among other common personal data: first name, last name, email address, date of birth. The project will collect basic biographical data, e.g., age, sex, years of experience, and position in the organization.

Special categories of personal data as personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation:

In the organization of its activities (such as workshops and dissemination events), the CLIMOP Consortium could process data concerning your health such as food allergies.



When participating in our project's activities, especially the stakeholders' consultation and validation, you will possibly disclose your personal opinions on specific proposed topics (e.g. various topics related to the environmental and climate impact of the Aviation domain and on measures to reduce such impact in an economically sustainable way).

Processing as any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

Under no circumstances data will be processed as biometric data (meaning personal data resulting from specific technical processing relating to the physical, physiological or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person).

Controller as the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law:

In the CLIMOP project, every partner is a controller, meaning that each partner is responsible for the lawfulness and security of processing of personal data in carrying out its research and dissemination activities. All the partners are committed to the respect of the principles and rules listed in the present document.

Processor as a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller:

Recipient as a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not.

In the context of the project activities, personal data will be exchanged exclusively by CLIMOP partners as independent controllers.

1.3. Principles for Data Protection

The CLIMOP research activities will be compliant with the Principles relating to processing of Personal Data, according to Article 5 of the GDPR:

- Lawfulness, fairness and transparency in relation to the data subject;
- **Purpose limitation:** Personal data will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- **Data minimization:** Personal data will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- **Accuracy**: Personal data will be accurate and, where necessary, kept up to date; data will not be modified or falsified.
- **Storage limitation:** Personal data will be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- **Integrity and confidentiality:** Personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or



unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures;

- Data protection by design and by default: The controller will implement appropriate technical and organisational measures which are designed to implement data-protection principles in an effective manner and to integrate the necessary safeguards into the processing in order to protect the rights of data subjects. The controller will implement appropriate technical and organisational measures for ensuring that, by default, only personal data which are necessary for each specific purpose of the processing are processed;
- **Accountability**: The controller will be responsible for and be able to demonstrate compliance with the above-mentioned principles.

1.4. Purposes and Legal basis for the processing of personal data

This research is carried out under the HORIZON 2020 project "CLIMOP". The main aim of CLIMOP project is to investigate, in a sound research framework, which aviation operational improvements may have a positive impact on climate, taking CO2 and non-CO2 effects into account.

The purpose for the processing of each category of personal data will be specifically indicated further on for every CLIMOP activity described in the next sections, specially focusing on stakeholders' consultation and dissemination activities.

The CLIMOP Consortium will process Personal data on a lawful basis, as provided in Articles 6 and 9 of the GDPR. Notably, the processing of Personal data will be based on **Consent** (for common Personal data) and **Explicit Consent** (for special categories of Personal data).

Consent of the data subject has to be freely given, specific and informed.

If the data subject's **consent** is given in the context of a written declaration which also concerns other matters, the request for consent shall be presented in a manner which is <u>clearly distinguishable from the other matters</u>, in an intelligible and easily accessible form, using clear and <u>plain language</u>.

The data subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. Prior to giving consent, the data subject shall be informed thereof. It shall be as easy to withdraw as to give consent.

As requested in Article 7 of the GDPR, the CLIMOP Consortium will be able to demonstrate that all data subjects have consented to processing of their Personal data.

Explicit consent will be obtained before processing special categories of personal data, such as food allergies and personal opinions.

According to the WP29 Guidelines on Consent, consent of the data subject means any:

- freely given,
- specific,
- informed and
- unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

The CLIMOP Consortium will ensure the so called "granularity" of consent:



"A service may involve multiple processing operations for more than one purpose. In such cases, the data subjects should be free to choose which purpose they accept, rather than having to consent to a bundle of processing purposes" (Guidelines, p. 3.1.3).

Prior to obtaining their consent, participants to CLIMOP activities will always be provided with information listed in Article 13 of GDPR, and with any communication under Articles 15 to 22 and 34 of GDPR relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

In all CLIMOP activities no Personal data will be processed without Informed, specific, explicit consent of the data subjects.

The main user groups targeted are professionals working in the aviation domain (e.g. representatives of Airlines, ANSPs and Airports, members of industry and government, researchers, etc.). Engaged stakeholders will have the competence to understand written and oral informed consent information.

CLIMOP research will NOT include children, adults unable to give informed consent, nor vulnerable individuals/groups.

1.5. Rights of Data Subjects

The General Data Protection Regulation provides a set of rules for the protection of fundamental rights of the data subjects, listed in Chapter III of the GDPR. This section contains a selection of the provisions of the law applicable to the case and peculiarities of CLIMOP research activities.

RIGHT TO INFORMATION

According to the Regulation n. 2016/679, the controller has to take appropriate measures to provide any information relating to processing to the data subject in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

With regard to the activities of CLIMOP, the data subject has the right to be informed at least about:

- the identity and the contact details of the controller;
- the contact details of the data protection officer;
- the purposes of the processing and the legal basis for the processing;
- the recipients or categories of recipients of the personal data;
- the intention of the controller to transfer personal data to a third country or international organisation;
- the period for which the personal data will be stored, or if that is not possible, the criteria
 used to determine that period;
- the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject as well as the right to data portability;
- the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
- the right to lodge a complaint with a supervisory authority;



• the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

RIGHT OF ACCESS (ART. 15)

The data subject has the right to obtain from the controller confirmation as to whether or not his/her personal data are being processed and access to the personal data and the basic information about the processing, such as the purposes, the categories of personal data processed, the possible recipients of data, even in third countries, the retention period, the existence of data subject's rights, the right to lodge a complaint to the supervisory authority, the existence of automated decision-making, including profiling, the source of data, when they have not been collected from the data subject.

Article 13 states that the controller has to provide to the data subject a copy of the personal data undergoing processing.

RIGHT TO RECTIFICATION (ART. 16)

The data subject has the right to ask to the controller the rectification of inaccurate personal data concerning him/her.

RIGHT TO ERASURE (ART. 17)

With regard to the activities of CLIMOP the data subject has the right to obtain from the controller the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

- 1) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- 2) the data subject withdraws consent and where there is no other legal ground for the processing;
- 3) the personal data have been unlawfully processed;
- 4) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the controller is subject.

The above-mentioned rules do not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health in accordance with points (h) and
 (i) of Article 9(2) as well as Article 9(3);
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

According to Article 17, par. 2 of the GDPR "Where the controller has made the personal data public and is obliged pursuant to paragraph 1 to erase the personal data, the controller, taking account of available technology and the cost of implementation, shall take reasonable steps, including technical measures, to inform controllers which are processing the personal data that the



data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data".

The above-mentioned rules do not apply to the extent that processing is necessary:

- for exercising the right of freedom of expression and information;
- for compliance with a legal obligation which requires processing by Union or Member State law to which the controller is subject or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3);
- for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) in so far as the right referred to in paragraph 1 is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- for the establishment, exercise or defence of legal claims.

RIGHT TO RESTRICTION OF PROCESSING (ART. 18)

The data subject has the right to obtain from the controller restriction of processing when the accuracy of his/her personal data is contested, for a period enabling the controller to verify the accuracy of the personal data, when the processing is unlawful, when the controller no longer needs the personal data for the purposes of the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims; when a verification i spending about the right to object.

Article 18 states that where processing has been restricted such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State.

NOTIFICATION ABOUT RECTIFICATION, ERASURE, RESTRICTION (ART. 19)

The controller has to communicate any rectification, erasure or restriction of processing personal data carried out to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort.

RIGHT TO DATA PORTABILITY (ART. 20)

As in CLIMOP project personal data are collected on the legal basis of consent, the data subject has the right to receive his/her personal data in a structured, commonly used and machine-readable format and has the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided

The data subject shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible.

RIGHTS ABOUT AUTOMATED INDIVIDUAL DECISION MAKING, INCLUDING PROFILING (ART. 22)

The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her, unless the processing is based on consent.

COMMUNICATION OF A PERSONAL DATA BREACH (ART. 34)



According to Article 34 of GDPR "When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the controller has to communicate the personal data breach to the data subject without undue delay".

EXERCISE OF DATA SUBJECT RIGHTS (ART. 12)

The data subject shall contact the controller and submit a request by sending an email to the following contact point ___alessandra.tedeschi@dblue.it ____.

The requested information will be provided to the data subject without undue delay and in any event within one month of receipt of the request.

Such period may be extended by two further months where necessary, taking into account the complexity and number of the requests.

The controller will inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the delay.

If case the controller does not take action on the request, the data subject will informed without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

The controller prepared an internal policy to manage requests of data subjects in accordance to the GDPR.

1.6. Security Measures, Data Storage, Data Retention, Data Destruction, Data Breaches

According to Article 24 of the GDPR, taking into account the nature, scope, context and purposes of processing as well as the risks of varying likelihood and severity for the rights and freedoms of natural persons, the controller shall implement appropriate technical and organisational measures to ensure and to be able to demonstrate that processing is performed in accordance with the Regulation itself.

The CLIMOP Consortium is committed to ensuring the effective protection of Personal data of all participants to its activities.

SECURITY MEASURES

The CLIMOP Consortium is committed to implement appropriate technical and organisational measures to guarantee in an effective manner the necessary safeguards for the processing of personal data. Article 32 of the GDPR recommends pseudonymisation and encryption of personal data as security measures which should ensure a level of security appropriate to the risk of processing. Pseudonymisation is "the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person" (Art. 4 par. 1 n. 5).

Pseudonymisation and other security measures will be implemented in the full compliance of the most recent rules, opinions and guidelines from European and national competent Authorities.

No data, which is not strictly necessary to accomplish the current study, will be collected; data minimization policy will be adopted at any level of the study and will be supervised by the ethical committee of the study; any shadow (ancillary) personal data obtained in the course of the observation will be immediately cancelled.



Data presented in publications or to employers will use aggregated data only, in which individuals cannot be identified. Pictures, videos and audios will be recorded only after the signature of a detailed Information Sheet and Consent Form. Also, for videos and images, participants' faces will be covered with a masking filter to prevent identification. For audio files, no name of participant, facilities, and companies will appear on audio files. Audio filters that distort voices will also be applied. The audios and videos will be not be used for any different purposes, nor disclosed to any third party and will be destroyed 2 years after the end of the project.

All the CLIMOP researchers involved in empirical studies and Data Collection Activities will be trained about Social, Ethical, Legal, Privacy issues and about current regulations.

DATA STORAGE

Data will consist of digital or/and paper data. Digital data will be stored on hard disks disconnected from the network, which will be stored in secured drawers; and/or on secured servers, with defined protocol that limit access to authorized personnel.

Latest encryption techniques will be applied to all digital data.

Paper data will be stored in secured drawers with access limited to authorized personnel.

DATA RETENTION

Project documentation, including technical documents describing the results of research activities, will be archived after the end of the project in password-protected servers.

DATA DESTRUCTION

Data will be destroyed two years past the termination of the project. Paper data will be physically destroyed. Digital data will be overwritten to ensure that they are effectively scrambled and remain inaccessible.

DATA BREACHES

In the case of a personal data breach, the controller will without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with GDPR rules, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

The controller prepared an internal policy to manage the event of a data breach in accordance to the GDPR. Every person affiliated to one of the CLIMOP partners has to report a suspected data breach to the following email address without undue delay alessandra.tedeschi@dblue.it.

1.7. Transfers of Personal Data to third countries or International organizations

CLIMOP involves only one non-EU partner (i.e.Turkey). Personal data might be imported from non-EU to EU (and NOT vice-versa). In carrying on the activities of CLIMOP project, no Personal data will be transferred from EU to non-EU countries.

Non-EU countries will be required to comply with the legal and ethical requirements for participation in EU research and H2020 guidelines.

A dedicated Deliverable will provide more detailed information on the Data flows to / from non – European Countries (D6.2).



2. WORKSHOPS

2.1. Description of the activities

1. Registration of participants

Participants are either invited personally or voluntarily register. Only common personal data are needed and recorded by CLIMOP Partners: First name and Last name, Organisation, Email address. Workshops will be organized by all the CLIMOP partners.

More information for personal identification could be required to access the premises of the workshop, as the workshop may be hosted by international organizations or private companies. The personal data will be collected and communicated to the host organization / company but not stored by CLIMOP Partners: First name, Last name, Date of birth, Place of Birth, Nationality, ID number, ID validity data. Information about food allergies could be necessary for those workshop that include meals.

2. Workshop activities

Participants may work in work sessions and provide personal opinions, experiences, comments, on safety research released topics.

Only aggregated results will be recorded and shared by CLIMOP Partners. Depending on the workshop topic, results may be shared with workshop participants, with the CLIMOP consortium, with the EU Project Officer, or made publicly available via the CLIMOP website.

The workshop may be video recorded, and photos may be taken for dissemination and communication purposes. Photos and videos will typically be edited and made publicly available via the CLIMOP website and newsletter. No spoken statement will be included in these videos, but only images of participants.

3. Future workshops

Workshop participants will be contacted for future workshops or dissemination events or the newsletter distributed to them. For these purposes the CLIMOP will retain only their first name and last name, organization, email.

2.2. Peculiarities about personal data processing

For the workshop activities, only First name and Last name, Organisation, Email address are needed and recorded by CLIMOP partners.

More information for personal identification will be collected and communicated to the host organization / company but not stored by CLIMOP Partners: First name, Last name, Date of birth, Place of Birth, Nationality, ID number, ID validity data, food allergies.

In Workshop activities only aggregated results will be recorded and shared.

The workshop may be video recorded, and photos may be taken for dissemination and communication purposes.

Freely given, specific, informed consent will be request to each participant in the workshop in relation to every different activity involving processing of personal data.



3. INTERVIEWS AND QUESTIONNAIRES

If considered necessary for the validation of the results of the project, CLIMOP will recruit participants for ad-hoc interviews and questionnaires.

Most of the partners that will eventually be involved in the interviews and questionnaires are based in EU countries and in Turkey (data imported into the EU).

3.1. Description of activities

1. Recruitment of participants

Participants are invited personally. They will be contacted among employees of CLIMOP partners and CLIMOP Advisory Board or affiliated to organizations within the network of established collaborators of the consortium.

Only common personal data are needed and recorded by CLIMOP Partners: First name and Last name, Organisation, Email address.

2. Interviews

The interviews will be audio recorded and will typically be held remotely (through Webex, Skype, Google Hangouts, or similar services).

Interviews will be performed by Deep Blue.

Participants will provide personal opinions, experiences, comments, and feedback on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium, and on various topics related to the environmental and climate impact of the Aviation domain and on measures to reduce such impact in an economically sustainable way.

3. Questionnaires

Questionnaires will typically circulate in digital form and will be collected by email or through dedicated platforms (for example: Google Forms or similar).

The collection will be performed by Deep Blue.

Participants' opinions, experiences, comments, ideas, and feedback will possibly be collected through questionnaires designed by the CLIMOP consortium.

The topics of the questionnaires will include the impact on climate of the Aviation sector as a whole, or of specific Aviation operations, and on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium.

4. Analysis

Collected data will be processed and analyzed by Deep Blue.

No personal identification data are needed at this stage; therefore, all the personal data collected will be subject to anonymization, with the exception of email addresses.

A qualitative content analysis will be performed on the interviews and questionnaires. Data and results will be shared with the rest of the consortium and will be published only in an aggregated form

Each participant will receive a summary transcript of the interview.

Follow up workshop or meetings with interviewees may be organized, inviting participants to attend to discuss results. For this reason, participants emails will be stored by the coordinator and/or the host partner. These workshops will be run as described in point 2.



3.2. Peculiarities of personal data processing

For the recruitment in the interview, only First name and Last name, Organisation, Email address are needed and recorded by CLIMOP partners.

During the interview, participants will provide personal opinions, experiences, comments, and feedback on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium, and on various topics related to the environmental and climate impact of the Aviation domain and on measures to reduce such impact in an economically sustainable wayThe interviews will be audio recorded.

The topics of the questionnaires will include the impact on climate of the Aviation sector as a whole, or of specific Aviation operations, and on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium.

Only aggregated results will be shared with the rest of the consortium.

The interviews will be audio recorded.

Freely given, specific, informed consent will be request to each interviewee and respondent in relation to every different activity involving processing of personal data.



4. REFERENCES

- European Commission, Ethics Guidance Material for H2020, http://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/ethics/h2020_hi_ ethics-self-assess_en.pdf;
- 2) European Union, General 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 (GDPR);
- 3) Article 29 WP, Guidelines on Consent under Regulation 2016/679 (wp259rev.01);
- 4) Article 29 WP, Guidelines on Transparency under Regulation 2016/679 (wp260rev.01);
- 5) Council of Europe, European Court of Human Rights, European Data Protection Supervisor, European Union Agency for Fundamental Rights, Handbook on European data protection law, 2018;
- 6) ENISA, Handbook on Security of Personal Data Processing, 2017.



5. APPENDIX. Data Protection Information Sheets and Consent Forms

A.1 Information sheet ex Art. 13 of the European General Data Protection Regulation n. 2016/679 and consent form - WORKSHOPS

Information sheet

You are being invited to take part in a research study forming part of the CLIMOP project. CLIMOP Consortium would like to process your personal data in order to carry out its research activities. Before you decide to give your consent to the processing of your personal data, it is important that you receive and understand all the relevant information about the processing of your personal data, in a transparent, intelligible, clear form. Please take time to read the following information carefully. If there is anything that is not clear, or you would like more information, please get in touch with the research team (contact details are provided at the end of this information sheet). After having read and understood the following information, please feel free to give your express consent to the processing of your personal data.

In accordance with Article 13 of the European General Data Protection Regulation n. 2016/679 (GDPR), CLIMOP is committed to provide you with any information about the lawful processing of your personal data, in full respect of the principle of transparency.

With reference to the WORKSHOP you are about to attend, we inform you that

- The Controller is, [legal, name, address, VAT]. You shall contact the Controller at the following email address: _______.
 You shall also contact the Data Protection Officer (DPO) at the following email address:
- 3. The purposes of the processing of your personal data are:
- registration to the workshop (common personal data)
- carrying out the workshop activities (common and special categories of personal data)
- analysis of data collected (common and special categories of personal data)
- dissemination (common and special categories of personal data)
- 4. The controller will process personal data provided by you. The provision of your personal data is necessary for your participation to the activities of the workshop. Your refusal to provide data will not allow you to participate in the workshop.

You will be asked to provide personal data such as first name and last name, organization, date of birth, place of birth, nationality, ID number (passport / driver license), ID valid until data, email address.

It may happen that you share information on special categories of personal data such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.



The workshop may be video recorded, and photos may be taken for dissemination and communication purposes.

Your data may also be processed following your request to be included in the newsletter service.

Your personal data will be collected and handled in paper or digital format.

- 5. Your personal data will be only processed on the basis of explicit consent, given specifically for each of the above-mentioned purposes. You have the right to withdraw consent at any time, without affecting the lawfulness of former processing.
- 6. Your personal data could be transmitted to [List of recipients]. If necessary, these subjects will be appointed as personal data processors. The controller will not disclose your data under any circumstances.
- 7. Your personal data will be processed by authorised and duly instructed subjects, able to ensure the safe and lawful processing of your personal data. These persons authorised to process personal data will also be bound by full confidentiality.
- 8. The processing of your personal data is based on the principles of correctness, lawfulness, transparency and minimization.

The controller does not apply any fully automated decision-making process of your personal data.

9. The personal data provided will only be stored for the time needed to fulfil the purposes they are collected and processed for.

Your common p	personal data	will be stored	until
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Audio/Screen recordings, and information about yourself will be treated as confidential by Controller. These recordings will be stored until......

In the event that you decide to give your consent to be included in the newsletter, your data will be kept until you decide to unsubscribe.

10. As a data subject, you have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing your personal data as well as the right to data portability; where the processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; you also have the right to lodge a complaint with a supervisory authority.



Informed Consent Form - WORKSHOPS

I,, Bc	rn in		on ₋	/	/
- declare that I have carefully read the a accepted its content	above inform	nation she	et, that I h	nave fully	understood ar
on/	_/				
Signature of the Data subject					
- give my explicit consent to the pro information sheet	cessing of	my perso	nal data,	according	to the abov
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Signature of the Data subject					
- give my explicit consent to the process special categories of personal data, acco					to the so-calle
on/	/				
Signature of the Data subject					
- give my explicit consent so that short explicit describes what I do cannot be precisely determined be used by the Controller for dissemir according to the above information sheet	d and that cand in	annot in a	ny way da	mage my	reputation, ma
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Signature of the Data subject					



A.2 Information sheet ex Art. 13 of the European General Data Protection Regulation n. 2016/679 and consent form – INTERVIEWS

Information sheet

You are being invited to take part in a research study forming part of the CLIMOP project. CLIMOP Consortium would like to process your personal data in order to carry out its research activities. its research activities. Before you decide to give your consent to the processing of your personal data, it is important that you receive and understand all the relevant information about the processing of your personal data, in a transparent, intelligible, clear form. Please take time to read the following information carefully. If there is anything that is not clear, or you would like more information, please get in touch with the research team (contact details are provided at the end of this information sheet). After having read and understood the following information, please feel free to give your express consent to the processing of your personal data.

In accordance with Article 13 of the European General Data Protection Regulation n. 2016/679 (GDPR), CLIMOP is committed to provide you with any information about the lawful processing of your personal data, in full respect of the principle of transparency.

With reference to the INTERVIEW you are about to answer, we inform you that

- 1. The Controller is, [legal, name, address, VAT]. You shall contact the Controller at the following email address: _______.
- 2. You shall also contact the Data Protection Officer (DPO) at the following email address:
- 3. The purposes of the processing of your personal data are:
- recruitment for the interview (common personal data)
- carrying out the interview (common and special categories of personal data)
- analysis of data collected (common and special categories of personal data)
- dissemination (common and special categories of personal data)
- 4. The controller will process personal data provided by you. The provision of your personal data is necessary for your participation to the interview. Your refusal to provide data will not allow you to participate in the activity.

You will be asked to provide personal data such as first name and last name, organization, email address.

In answering the interview, you will also be asked to provide personal opinions, experiences, comments, and feedback on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium, and on various topics related to the environmental and climate impact of the Aviation domain and on measures to reduce such impact in an economically sustainable way.

It may happen that you share information on special categories of personal data such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely



identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

The interviews will be audio recorded. You will receive a summary transcript of the interview.

Your personal data will be collected and handled in digital format.

- 5. Your personal data will be only processed on the basis of explicit consent, given specifically for each of the above-mentioned purposes. You have the right to withdraw consent at any time, without affecting the lawfulness of former processing.
- 6. Your personal data could be transmitted to [List of recipients]. If necessary, these subjects will be appointed as personal data processors. The controller will not disclose your data under any circumstances.
- 7. Your personal data will be processed by authorised and duly instructed subjects, able to ensure the safe and lawful processing of your personal data. These persons authorised to process personal data will also be bound by full confidentiality.
- 8. The processing of your personal data is based on the principles of correctness, lawfulness, transparency and minimization.

The controller does not apply any fully automated decision-making process of your personal data.

9. The personal data provided will only be stored for the time needed to fulfil the purposes they are collected and processed for, after that they will be subject to anonymization.

Your common personal data will be stored until	
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Audio recordings and information about yourself will be treated as confidential by Controller. These recordings will be stored until.....

10. As a Data subject, you have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing your personal data as well as the right to data portability; where the processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; you also have the right to lodge a complaint with a supervisory authority.



Informed Consent Form – INTERVIEWS

l,		, Born in	on _	/	_/
- declare that I hav accepted its conten		he above information	on sheet, that I h	ave fully unde	erstood and
	on/				
Signature of the Da	ta subject		_		
- give my explicit information sheet	consent to the	processing of my	personal data,	according to	the above
	on/_	/			
Signature of the Da	ta subject		_		
- give my explicit c special categories of					ne so-called
	on/	/			
Signature of the Da	ta subject		_		
- give my explicit information sheet	consent so the	audio recording o	f the interview,	according to	the above
	on/	/			
Signature of the Da	ta subject		_		



A.3 Information sheet ex Art. 13 of the European General Data Protection Regulation n. 2016/679 and consent form – QUESTIONNAIRES

Information sheet

You are being invited to take part in a research study forming part of the CLIMOP project. CLIMOP Consortium would like to process your personal data in order to carry out its research activities. its research activities. Before you decide to give your consent to the processing of your personal data, it is important that you receive and understand all the relevant information about the processing of your personal data, in a transparent, intelligible, clear form. Please take time to read the following information carefully. If there is anything that is not clear, or you would like more information, please get in touch with the research team (contact details are provided at the end of this information sheet). After having read and understood the following information, please feel free to give your express consent to the processing of your personal data.

In accordance with Article 13 of the European General Data Protection Regulation n. 2016/679 (GDPR), CLIMOP is committed to provide you with any information about the lawful processing of your personal data, in full respect of the principle of transparency.

With reference to the QUESTIONNARIES you are about to answer, we inform you that

1. The Controller is, [legal, name, address, VAT]. You shall contact the Controller at the following email address: _______.

2. You shall also contact the Data Protection Officer (DPO) at the following email address:

- 3. The purposes of the processing of your personal data are:
- recruitment for the questionnaire (common personal data)
- carrying out the questionnaire (common and special categories of personal data)
- analysis of data collected (common and special categories of personal data)
- dissemination (common and special categories of personal data)
- 4. The controller will process personal data provided by you. The provision of your personal data is necessary for your participation as a respondent to the questionnaire. Your refusal to provide data will not allow you to participate in the activity.

You will be asked to provide personal data such as first name and last name, organization, email address.

The topics of the questionnaires will include the impact on climate of the Aviation sector as a whole, or of specific Aviation operations, and on the feasibility and expected impact on the Aviation operations of selected Operational Improvements proposed by the consortium.

You may also will asked to provide special categories of personal data such as data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.



Questionnaires will typically circulate in digital form and will be collected by email or through dedicated platforms. You will receive a summary transcript of the questionnaire.

Your personal data will be collected and handled in digital format.

- 5. Your personal data will be only processed on the basis of explicit consent, given specifically for each of the above-mentioned purposes. You have the right to withdraw consent at any time, without affecting the lawfulness of former processing.
- 6. Your personal data could be transmitted to [List of recipients]. If necessary, these subjects will be appointed as personal data processors. The controller will not disclose your data under any circumstances.
- 7. Your personal data will be processed by authorised and duly instructed subjects, able to ensure the safe and lawful processing of your personal data. These persons authorised to process personal data will also be bound by full confidentiality.
- 8. The processing of your personal data is based on the principles of correctness, lawfulness, transparency and minimization.

The controller does not apply any fully automated decision-making process of your personal data.

9. The personal data provided will only be stored for the time needed to fulfil the purposes they are collected and processed for.

Audio recordings and information about yourself will be treated as confidential by Controller. These recordings will be stored until.....

10. As a Data subject, you have the right to request from the controller access to and rectification or erasure of personal data or restriction of processing your personal data as well as the right to data portability; where the processing is based on consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal; you also have the right to lodge a complaint with a supervisory authority.



Informed Consent Form – QUESTIONNARIES

,	, Born in	on	//	
- declare that I have carefully accepted its content	read the above information	sheet, that I have	fully understood	d and
on				
Signature of the Data subject _				
- give my explicit consent to information sheet	o the processing of my p	ersonal data, acc	cording to the a	above
on				
Signature of the Data subject _				
give my explicit consent to the special categories of personal c				called
on				
Signature of the Data subject _				