"Building the Next Generation Personal Data Platforms"
G.A. n. 871370

Deliverable D7.5

Legal and ethical implementation, oversight and evaluation

H2020-EU-2.1.1: PIMCity

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PU	Public	☑
PP	Restricted to other programme participants (including the Commission Services)	
RE	Restricted to a group specified by the consortium (including the Commission Services)	
CO	Confidential, only for members of the consortium (including the Commission Services)	

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Approvals

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Version 1	30-06-2022	Initial version
Version 2	31-07-2022	Draft reviewed version
Version 3	31-08-2022	Final version

LIST OF ABBREVIATIONS

Abbreviation	Meaning
D7.1	Deliverable D7.1 of the PIMCity project
D7.2	Deliverable D7.2 of the PIMCity project
D7.3	Deliverable D7.3 of the PIMCity project
D7.4	Deliverable D7.4 of the PIMCity project
D7.6	Deliverable D7.6 of the PIMCity project
DMP	Data Management Plan
DPIA	Data protection impact assessment
DPO	Data protection officer
EU	European Union
FAIR data	Findable, accessible, interoperable and re-usable data
GDPR	General Data Protection Regulation
KUL	KU Leuven – CiTiP
PIMCity project	Horizon2020 project PIMCity (Building the next generation Personal Data Platforms), Grant Agreement No. 871370

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INTRODUCTION

The Deliverable 7.5 *Legal and ethical implementation, oversight and evaluation* (further as D7.5) provides a concise evaluation of the PIMCity project's compliance with legal and ethical requirements, particularly with the relevant EU privacy and data protection requirements.

STRUCTURE

D7.5 consists of two parts. The first part provides a concise compliance evaluation of both personal data processing within the platform and personal data processing during the project, whereas the second part consists of partners' individual declarations about personal data processing activities within the platform and during the project or lack thereof. The latter part is based on both verbal and written declarations of the project partners as well as on the interviews conducted by KATHOELIEKE UNIVERSITEIT LEUVEN with each individual partner of the project in March 2022.

EVALUATION

PERSONAL DATA PROCESSING WITHIN THE PLATFORM

Monitoring of the project activities and the above-mentioned interviews with the project partners revealed that eventually only a few partners will be involved in personal data processing activities within the platform. Specifically, POLITECNICO DI TORINO will act as a data controller, whereas FASTWEB SPA, ERMES CYBER SECURITY SRL and ASOCIACION DE USUARIOS DE INTERNET will act as data processors.

POLITECNICO DI TORINO – as a data controller of the platform – confirmed that the platform was designed in a way that will allow both the data controller to fulfil all its obligations, and the data subjects to exercise all their rights as outlined in the 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 (further as the GDPR). More details about the adopted technical measures that will ensure that the data subjects will be able to exercise their rights efficiently are available in the privacy policy for the data subjects, D7.2 for legal guidance and D5.1, D5.2 for the technical implementation.

Overall, the platform was designed in a way that ensures that personal data will be processed in accordance with all the principles as outlined in the GDPR, also outlined in D7.2. Specifically, personal data will be processed lawfully, fairly and in a transparent manner in relation to the data subject (the principles of lawfulness, fairness and transparency were fulfilled); will be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (the principle of purpose limitation was fulfilled); will be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (the principle of data minimisation was fulfilled); will be accurate (the principle of accuracy was fulfilled); 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 (the principle of storage limitation was fulfilled); 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 (the principles integrity and confidentiality were fulfilled). More details about the adopted technical and organisational measures are available in D.2.3; D5.1, D5.2.

The particular details of the foreseen personal data processing activities are revealed in the draft privacy policy of the platform provided below.

Privacy policy
The following privacy policy is used for the EasyPIMS platform. At first, the privacy policy will be shown and then its compliance with current data protection legislation will be discussed:

POLITECNICO DI TORINO – Department of Electronics and Telecommunications

Privacy Policy

Last revised on 12/04/2022

Please read this privacy policy carefully so that you fully understand how we collect, use and store information about you. In case you accept this privacy policy, we assume that you understand and agree with all the details provided below. Occasionally, we may update this privacy policy, so please kindly visit our website to always find the latest version. We will contact you in case there will be important changes.

1. **Introduction**

1. **POLITECNICO DI TORINO**, **Department of Electronics and Telecommunications** a public University in Italy, with registered addressed at Corso Duca degli Abruzzi 24, 10129, Torino (further as 'the Controller' or 'we') protects your information and your privacy and processes your personal data following the requirements provided by the relevant laws.[1]

2. This privacy policy (further as 'the Privacy Policy') describes how we process your personal data. In particular, this Privacy Policy provides details on:
   1. **which personal data** (further as data) of yours we collect (categories);
   2. **who** can you contact in case of any questions or complaints concerning your data (our contacts and contacts of our data protection officer);
   3. **why** do we process your data (purposes)**;**
   4. what **legal grounds** do we have to process your data (legal bases and legitimate interests);
   5. **who else will receive** your data (recipients);
   6. **for how long** we will store your data (period);
   7. your **rights.**

3. We value privacy and are therefore committed to protect the (personal) data of all our stakeholders with the greatest possible care, and to process personal data only in a fair and lawful manner. This Privacy Statement is applicable to our customers, partners and website visitors for the personal data collected and processed by through this website and the related services.

4.   This Privacy Policy contains essential information on how, as the data controller, collects and processes personal data, for what purposes and explains your rights as a data subject.

2.   **Which information do we collect?**

1.   We collect and can process the following data:
- Full name
- Mail address
- Date of birth
- Country you live in
- City you live in
- Gender
- Household members
- Phone number
- Income
- Job
- Education
- Location history
- Browsing history
- User interests based on your location and browsing history

In addition, we also process various documents submitted by you or concerning you and your communications to us in order to process and handle your queries, requests and complaints, and to engage into legal proceedings in case that would appear necessary.

3.   **Why do we collect information about you?**

1.   We process your data based on three legal bases: consent (art. 6(1)(a) of the GDPR, contract (art. 6(1)(c) of the GDPR and our legitimate interests (art. 6(1)(f) of the GDPR.

2.   The following data is used for the specified purposes and based on the specified legal basis:

Why do you collect my information?	Which information do you collect about me?	Why are you legally allowed to collect my information?	How long do you keep information about me?
To process and handle your queries, requests and complaints, and to engage in legal proceedings in case that would appear necessary	Name, surname, contact details you contacted us through, the information included in the query, request or complaint.	Based on our **legitimate interest** in handling your inquiries, art 6, 1, f) GDPR	For three years after the project ended (approx. August 2025)
To inform you about policy changes, inform you in case	Name, surname and e-mail address	Based on **contract** when you sign-up for	For three years after the project ended

you win a prize, contact you to participate in surveys, and in general contact you in case of need		our platform, art. 6, 1, c) GDPR	(approx. August 2025)
For academic research such as data analyses, generation of participation insight (note that anonymisation and aggregation of data is applied whenever possible).	Date of birth, Country you live in, City you live in, Gender, Household members, Phone number, Income, Job, Education	Based on your **consent** (by voluntarily submitting it and giving granular consent to sharing it), art. 6, 1, a) GDPR	For three years after the project ended (approx. August 2025) or unless you revoke your consent earlier
For advertisement on the website/platform	Date of birth, Country you live in, City you live in, Gender, Household members, Phone number, Income, Job, Education.	Based on your **consent** (by voluntarily submitting it and giving granular consent to sharing it), art. 6, 1, a) GDPR	For three years after the project ended (approx. August 2025) or unless you revoke your consent earlier
Creating individual profiles and showing targeted advertisements. We also share this profile and the resulting data to third parties for receiving offers from data buyers	Location history, browser history.	Based on your **consent** (by voluntarily uploading it), art. 6, 1, a) GDPR	For three years after the project ended (approx. August 2025) or unless you revoke your consent earlier

4. **Which information do you have to provide and why?**

You should provide us with the information that is necessary to handle your complaints, queries and requests. In case you would not provide us with such information, we would not be able to handle them.

5. **Is your information shared with anyone else?**

1. The whole EasyPIMS platform is to let users to freely control which of their personal data can be shared with data buyers. Data buyers can ask to get an audience of users that satisfy certain constraints (e.g., their profile and interests match the interests of the data buyer). Only users that provided their explicit consent can be part of an audience.

2.	EasyPIMS is part of the Project PIMCity, funded by the European Commission (EC). While we are not going to share any of your data with the EC, we will use your personal data to elaborate statistics about the users that participate in the experimental part of the project. Only users who gave their consent to use their data for research will be included in the analysis.

3.	We may also share your data to courts and other institutions or subjects when it is required by law.

4.	Other than as set out in this Privacy Policy, we shall not disclose your data to any third parties without obtaining your prior explicit consent unless that would be required by law.

### 6.	**For how long do we keep your information?**

1.	We will not retain your personal data longer than strictly necessary for the realization of the purpose of the platform. We as a project have to commit to store data for three years after the project ends in August 2022. As such, we will store your data for three years until after the end of the project, i.e. August 2025.

### 7.	**How do we secure your information?**

1.	All data are stored in a secure server running in a data centre in Fastweb premises. All data are backed up in a separate server in the same premises. We do not have physical access to the servers, and they are reachable only using a dedicated access protected by a VPN secured by a two-factor authentication. The access to the database is limited to only to a subset of our personnel, after strong authentication.

2.	We will take appropriate administrative, technical, and organizational measures against unauthorized or unlawful processing of any data or its accidental loss, destruction or damage, access, disclosure or use.

3.	In the event of and following discovery or notification of a breach of the security of the data, or access by an unauthorised person, we will notify you if the breach is likely to affect your privacy.

### 8.	**How do we manage cookies?**
1.	We only use strictly necessary cookies for the functioning of the platform.

### 9.	**What are your rights?**

•	You can withdraw your consent given to us to process your data at any time.
•	You can ask us whether we process the data about you and request access to that data.
•	You can ask us to correct the inaccurate data about you, or you can correct this yourself in your user profile.
•	You can ask us to delete the data about you and we will delete it in case there are no legal basis for us to process it.

- You can ask us to restrict processing of your data (i) in case you contest the accuracy of the data, (ii) in case the processing is unlawful and you oppose the erasure of it, (iii) in case we no longer need the data but your data is necessary for you for the legal claims, or (iv) in case you have objected to processing pursuant to Art. 21(1) of the GDPR pending the verification whether our legitimate grounds override those of yours.
- You can object processing your data.
- You can download (and transfer) your data directly from the platform.
- You can complain to a supervisory authority and to seek a judicial remedy.
- You can look for your country's Data Protection Authority here.

10. **How can you contact us?**

Data Controller
POLITECNICO DI TORINO – Department of Electronics and Telecommunications, with its registered office situated at Corso Duca degli Abruzzi 24, 10129 Torino, Italy, contact via politecnicoditorino@pec.polito.it (certified e-mail).

Data Protection Officer Team
To get directly into touch with the DPO team of PIMCity, contact dpo@pimcity-h2020.eu.

Evaluation
This privacy policy transparently, adequately and concisely explains the processing to the data subjects and conforms to the GDPR in the following way:

The processing of data is based on three stages:
1. Sign-up
2. Uploading data
3. Sharing data

The first stage is the creation of an account. Data subjects have to provide the necessary information in order for the platform to be used based on contract. This information is full name and e-mail address. This data is necessary for the usage of the service such as contacting the data subject about the platform and only serves this purpose.

For stages 2 and 3, data subjects can *voluntarily* upload data (step 2) and then *voluntarily* share it with data buyers (step 3) after receiving a data offer, they both rely on consent. The entire premise is that the data subject provides data they want to provide. Afterwards, the data buyers can make requests to have access to this data on a case-by-case basis.

The following information is provided at sign-up to the data subject:
1. Identity and contact details of the controller and the DPO
2. Purposes of the processing and the applicable legal basis
3. The legitimate interest pursued if applicable
4. Recipients of the personal data
5. Retention period
6. All data subject rights
7. Description of security measures
8. Cookies used (none besides strictly necessary cookies)

Agreements with data processors

During the course of the project the project partners, including the data controller of the platform, i.e. POLITECNICO DI TORINO, were familiarised in detail with the requirements for data processors and provided with non-exhaustive recommendations for data processing agreements (also available in D7.6). POLITECNICO DI TORINO undertook to apply these guidelines in consultation with its legal department and taking into account the specific details of the particular operations.

Agreements with joint controllers

In the light of potential relationships with data buyers, the project partners, including POLITECNICO DI TORINO, were also familiarised with the circumstances in which organisations are considered to be joint controllers and provided with non-exhaustive recommendations for agreements between/among them (also available in D7.6). POLITECNICO DI TORINO undertook to apply these guidelines in consultation with its legal department and considering the specific details of the particular operations and taking into account the considerations and guidelines as provided in D7.5 and D7.6.

Consent forms

The project partners were provided with the detailed guidelines for consent management in D7.1 as well as during the course the project and have followed these guidelines while designing the platform interface. The Data Management Plan in D7.6 also includes a part on consent management.

The implemented consent forms relied heavily on these guidelines and are deemed fully in line with both GDPR and ePrivacy Directive. The EDPB Guidelines 05/2020 on Consent were followed. Consent must always be given *actively*, i.e. by checking a box. As shown below, consent forms are presented in an intelligible and easily accessible form (such as shown in the personal consent management). Information about the processing is both provided in a concise and more extensive way so users can be easily informed, while more advanced users are able to receive more details about the processing. This transparency increases the knowledge and understanding of the data subject in line with the GDPR.

Consent can also be withdrawn as easily as it is given, in the same way by unchecking the box and saving the settings.

If a data subject wants to object to further processing and/or have its data deleted, they are also able to do this in their 'My Data' tab. In here they can also download their data in light of data portability.

Cookie banner

We use cookies to optimize our website and collect statistics on usage. Please, check the Privacy Policy

Allow all cookies

Clear cookies

PERSONAL DATA PROCESSING DURING THE PROJECT

Monitoring of the project activities and the above-mentioned interviews with the project partners revealed that eventually only a few partners were involved in personal data processing activities during the project. Specifically:

- ERMES CYBER SECURITY SRL, TELEFONICA INVESTIGACION Y DESARROLLO SA and FASTWEB SPA acted as data controllers while processing personal data for developing technical solutions in the framework of the project. However, the referred personal data processing took place within each individual partner as an organisation, i.e. the personal data in question were not shared within the project and with any of the PIMCity partners. Specifically, the referred partners provided the PIMCity project and its partners with anonymised insights only. In relation to this, to this extent the compliance with the relevant privacy and data protection requirements was sole responsibility of each individual partner and was ensured by each of them individually.
- ASOCIACION DE USUARIOS DE INTERNET and INTERACTIVE ADVERTISING BUREAU SPAIN acted as data controllers while processing personal data collected for the workshops organised in the framework of the project, whereas POLITECNICO DI TORINO and ASOCIACION DE USUARIOS DE INTERNET acted as data controllers while processing personal data collected on the project websites. The referred personal data processing also took place within each individual partner as an organisation, i.e. the personal data in question were not shared within the project and with any of the PIMCity partners. Nevertheless, since the personal data were collected specifically for the workshops organised in the framework of the project and on the websites of the project, the referred project partners were provided with detailed guidance on privacy policies and consent management.

Privacy policies and consent forms

The project partners were provided with the detailed guidelines for privacy policies and consent forms in D7.1 as well as during the course the project and have followed these guidelines while drafting the privacy policies for the project websites and workshops, as well as while collecting consents for each of the workshops organised throughout the course of the project.

The following privacy policy was used by IAB Spain in their processing for the project:
IAB Spain
Privacy Policy- Política de Privacidad
Revised on 09/02/2021- Revisada a día 09/02/2021

Please read this privacy policy carefully so that you fully understand how we collect, use and store information about you. This privacy policy (further as 'the Privacy Policy') describes how we process your data in the context of the workshop organised on 23rd February 2021 (further as the workshop). In case you accept this privacy policy, we assume that you understand and agree with its conditions. Although it is unlikely that we will update this privacy policy before the workshop, rest assured we will contact you in case there are important changes.

Le rogamos que lea detenidamente esta política de privacidad para que entienda perfectamente cómo recopilamos, utilizamos y almacenamos la información de los usuarios. Esta política de privacidad (en adelante, "la política de privacidad") describe cómo tratamos sus datos en el contexto del evento organizado el 23 de febrero de 2021 (en adelante, el evento). En caso de que acepte esta política de privacidad, asumimos que entiende y está de acuerdo con sus condiciones. Aunque es poco probable que actualicemos esta política de privacidad antes del evento, puede estar seguro de que nos pondremos en contacto con usted en caso de que haya cambios importantes.

1. **Introduction- Introducción**

IAB Spain is a non-profit association with registered address Pº Castellana 113, 2ºdcha. 28020 – Madrid (further as 'the Data Controller' or 'we') protects your information and your privacy and processes your personal data (further as 'data') following the requirements provided by the relevant laws.

In case you would have any questions or concerns, you will find our contacts and the supervisory authority below.

IAB Spain es una asociación sin animo de lucro con domicilio social en Pº Castellana 113, 2ºdcha. 28020 - Madrid (en adelante, "el Responsable del Tratamiento" o "nosotros") y protege su información y su privacidad y trata sus datos personales (en adelante, "los datos") siguiendo los criterios establecidos por las leyes pertinentes.

En caso de que tenga alguna pregunta o duda, a continuación encontrará nuestros contactos y la autoridad de control.

2. **Which data do we process, why and for how long? - Datos tratados, sus finalidades y periodos de conservación**

Why do we process data- Finalidades	Which data do we process- Datos tratados	Why are we allowed to process your data- Base legal del tratamiento
We process your data to be able to remind you about the workshop and to inform you about its details via email, in order for you to be able to attend the workshop and to be able to receive workshop materials. Tratamos sus datos para poder recordarle el evento y para informarle de los detalles del mismo por correo electrónico, para que pueda asistir al evento y para que pueda recibir los materiales del mismo.	Name, e-mail address, organisation. Nombre, email, empresa.	We are allowed to process it on the basis of legitimate interests, Art. 6(1)(f) of the European Union General Data Protection Regulation. Estamos autorizados a tratarla en base a intereses legítimos, Art. 6(1)(f) del Reglamento General de Protección de Datos de la Unión Europea.

We process your data to be able to invite you and inform you about the future events organised by the consortium of PIMCity project in the framework of this project (funded by the European Union Horizon 2020 Research and Innovation programme under the ICT theme: ICT-13-2018-2019, Grant Agreement No. 871370). Tratamos sus datos para poder invitarle e informarle sobre los futuros eventos organizados por el consorcio del proyecto PIMCity en el marco de este proyecto (financiado por el programa de investigación e innovación Horizonte 2020 de la Unión Europea bajo el número ICT: ICT-13-2018-2019, Grant Agreement nº 871370)	Name, e-mail address, organisation. Nombre, email, empresa.	We are allowed to process it on the basis of your consent Art. 6(1)(a) of the European Union General Data Protection Regulation. Estamos autorizados a tratarla en base a su consentimiento, Art. 6(1)(a) del Reglamento General de Protección de Datos de la Unión Europea.
Even though it is less likely, we may also process your data for processing queries, requests or complaints submitted by you in order to handle them, as well as to engage in legal proceedings related to you. Aunque es menos probable, también podemos tratar sus datos para procesar las consultas, solicitudes o reclamaciones presentadas por usted con el fin de gestionarlas, así como para participar en procedimientos legales relacionados con usted.	Name, surname, e-mail address, query, request or complaint, our correspondence and documents that are necessary for handling the particular query, request or complaint or for engaging in legal proceedings related to you. Nombre, apellidos, dirección de correo electrónico, consulta, solicitud o reclamación, nuestra correspondencia y los documentos que sean necesarios para tramitar la consulta, solicitud o reclamación concreta o para iniciar un procedimiento judicial relacionado con usted.	We are allowed to process it on the basis of legitimate interests, Art. 6(1)(f) of the European Union General Data Protection Regulation. Estamos autorizados a tratarla en base a intereses legítimos, Art. 6(1)(f) del Reglamento General de Protección de Datos de la Unión Europea.

3. **Do you have an obligation to provide your data? ¿Tiene usted la obligación de facilitar sus datos?**

You have no obligation to provide your data, however without having your data we will not be able to remind and inform you about the workshop. In case you do not consent to your data processing for being invited and informed about the future events in the framework PIMCity project, we will not be able to invite you and inform you such events.

No tiene la obligación de facilitar sus datos, pero sin ellos no podremos mantenerle informado y recordarle el evento. En caso de que no consienta el tratamiento de sus datos para ser invitado e informado de los futuros eventos en el marco del proyecto PIMCity, no podremos invitarle ni informarle de dichos eventos.

4. **Is your data shared with anyone else? ¿Compartimos sus datos con terceros?**

No, we do not share your data with any third parties. We will not disclose your data to any third parties without obtaining your prior explicit consent unless that would be necessary and permitted by law. For example, we may share your data to courts and other institutions or subjects in case it is required by law.

No, no compartimos sus datos con terceros. No revelaremos sus datos a ningún tercero sin obtener su consentimiento explícito previo, a menos que sea necesario y esté permitido por la ley. Por ejemplo, podemos compartir sus datos con los tribunales y otras instituciones o sujetos en caso de que lo exija la ley.

5. How do we secure your data? ¿Cómo protegemos sus datos?

We manage the website through our own staff. Only relevant IAB SPAIN staff will access your personal data. You can access the cookies policy through the following website: https://iabspain.es/politica-de-cookies/

We take appropriate administrative, technical and organisational measures against unauthorized or unlawful processing of any data or its accidental loss, destruction or damage, access, disclosure or use.

In the event of and following discovery or notification of a breach of the security of the data, or access by an unauthorised person, we will notify you in case the breach is likely to affect your privacy.

Nos encargamos de gestionar el sitio web a través de nuestro propio personal. Solo el personal relevante de IAB SPAIN accederá a sus datos personales. Puedes acceder a la política de cookies a través del siguiente sitio web: https://iabspain.es/politica-de-cookies/

Tomamos las medidas administrativas, técnicas y organizativas adecuadas contra el tratamiento no autorizado o ilegal de cualquier dato o su pérdida, destrucción o daño accidental, el acceso, la divulgación o el uso.

En caso de que se descubra o se notifique una violación de la seguridad de los datos, o el acceso por parte de una persona no autorizada, se lo notificaremos en caso de que la violación pueda afectar a su privacidad.

7. What are your rights? ¿Cuáles son sus derechos?

You can ask us whether we process any data of yours and, if yes, you can request access to that data.

You can ask us to correct the inaccurate data about you.

You can ask us to delete the data about you, and the data shall be deleted in case there are no legal bases for us to process it.

You can ask us to restrict the processing of your data: (i) in case you contest the accuracy of the data, (ii) in case the processing is unlawful and you oppose the erasure of it, (iii) in case we no longer need the data but they are required by you for the legal claims, or (iv) in case you have objected to the processing pursuant to Art. 21(1) of the European Union General Data Protection Regulation pending the verification whether our legitimate grounds override those of yours.

You can object the processing of your data.

You have a right to complain to a supervisory authority (please kindly find contacts below) and to seek a judicial remedy.

Puede preguntarnos si tratamos algún dato suyo y, en caso afirmativo, puede solicitar el acceso a esos datos.

Puede pedirnos que corrijamos los datos inexactos sobre usted.

Puede pedirnos que eliminemos los datos sobre usted, y los datos se eliminarán en caso de que no haya habilitación legal para su tratamiento.

Puede pedirnos el bloqueo en el tratamiento de sus datos: (i) en caso de que impugne la exactitud de los datos, (ii) en caso de que el tratamiento sea ilegal y se oponga a la supresión de los mismos, (iii) en caso de que ya no necesitemos los datos pero usted los necesite para reclamaciones legales, o (iv) en caso de que se haya opuesto al tratamiento de acuerdo con el Art. 21(1) del Reglamento General de Protección de Datos de la Unión Europea, a la espera de comprobar si nuestros motivos legítimos prevalecen sobre los suyos.

Puede oponerse al tratamiento de sus datos.

Tiene derecho a presentar una reclamación ante una autoridad de control (encontrará los contactos más abajo) y a interponer un recurso judicial.

The Spanish Data Protection Authority- AEPD
C/ Jorge Juan, 6. 28001 – Madrid
Tel. 901 100 099 - 912 663 517
Email: info@aepd.es
Website: https://www.aepd.es

If you have any questions or complaints with regard to processing of your data, please send an email to our legal department. Si tiene alguna pregunta o reclamación en relación con el tratamiento de sus datos, envíe un correo electrónico a nuestro departamento jurídico

iablegal@iabspain.es

Data Controller- Responsable del tratamiento
IAB Spain, Pº Castellana 113, 2ºdcha. 28020 – Madrid
Email: iablegal@iabspain.es
Website: www.iabspain.es

The relevant project partners confirmed that the conditions outlined in the referred policies and forms were met.

Cookie banners

The relevant project partners confirmed that the personal data were processed accordingly. This is the cookie banner used on pimcity.com. The cookie banner is created in accordance with EDPB Guidelines 05/2020 on consent. The only placed cookies (when allowed) are Matomo Analytics cookies which process information in an anonymised way.
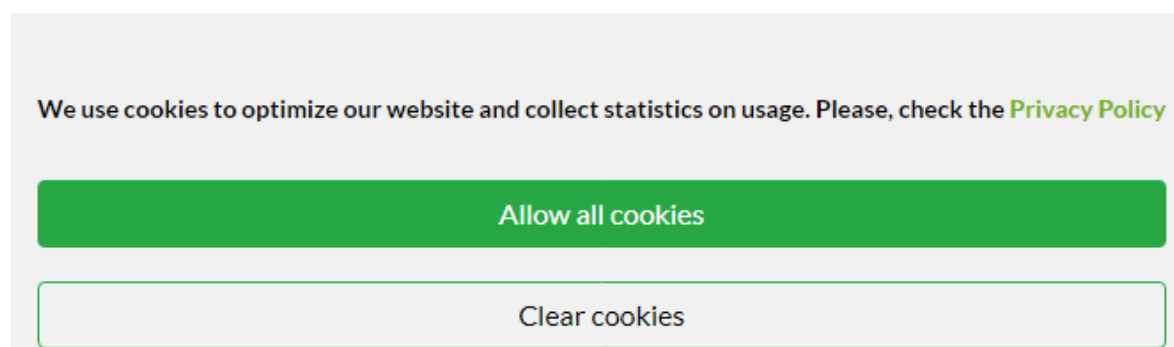
In EasyPIMS, only technical cookies are placed as detailed in the privacy policy shown when a users register to the platform.

Overall, all the above-mentioned partners confirmed that personal data which was processed within PIMCity project were processed in accordance with all the principles as outlined in the 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 (further as the GDPR), and also outlined in D7.2. Specifically, the personal data were processed lawfully, fairly and in a transparent manner in relation to the data subject (the principles of lawfulness, fairness and transparency were fulfilled); were collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (the principle of purpose limitation was fulfilled); were adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (the principle of data minimisation was fulfilled); were accurate (the principle of accuracy was fulfilled); were 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 (the principle of storage limitation was fulfilled); and were 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 (the principles integrity and confidentiality were fulfilled). More details about the adopted technical and organisational measures are available in D7.6.

Data Management Plan and Responsible Research and Innovation

The project partners prepared and continuously updated the Data Management Plan (further as the DMP), which outlined comprehensive approach and joint efforts towards making research data findable, accessible, interoperable and re-usable (FAIR), and the Report on Responsible Research and Innovation, which confirmed that PIMCity partners committed to responsible research and innovation via particular elements of public engagement, Open Access, gender, ethics, science education. These documents were submitted to the project as D7.1, D7.3, D7.4 and D7.6. Taking into account the particular goals and research activities of the project, PIMCity partners paid particular attention to ethics as an integral part of research and, specifically, to the requirements of privacy and data protection.

The project partners confirmed *in corpore* that the commitments identified in these documents were fulfilled, and in the light of the actions undertaken by the consortium as a whole and by different partners individually, the partners expect the project results to be inclusive, socially acceptable and to provide durable societal impact.

The DMP also contained the project's data protection impact assessment (further as the DPIA), which was submitted as a part of D7.1, D7.4 and D7.6.
To achieve comparable results, PIMCity partners have opted for a common approach concerning tools and methodology for the execution of the DPIA.

First, KU Leuven – CiTiP has provided clarifications and guidelines on the DPIA, and how this should be developed. Consortium partners IAB Spain, NEC Laboratories Europe, Politecnico di Torino, Fastweb, Asociación de Usuarios de Internet, Universidad Carlos III de Madrid, Telefónica Investigación y Desarrollo, IMDEA Networks, (further as the PIMCity partners) have concluded that, given their roles and foreseen activities in the PIMCity project, they shall carry out a DPIA.

Second, partners whose activity might fall into the GDPR scope of application, have carried out its respective DPIAs individually. Following the suggestion of KU Leuven – CiTiP, the partners have developed their DPIA through the software PIA, provided by the French Data Protection Authority 'CNIL' ('Commission Nationale de l'Informatique et des Libertés'). CNIL software has been chosen

for two main reasons: it is developed by a national data protection authority, and include all requirements listed in Art. 35(7) GDPR.

Third, the final results of the PIMCity partners individual DPIA have been shared within the consortium through the project repository made available in Microsoft 'Teams'.

Finally, the results provided by partners have been collected and summarised by KU Leuven – CiTiP. Towards the end of the project, the DPIAs were conducted again to confirm appropriate risk mitigating measures were implemented adequately.

INDIVIDUAL PARTNERS' DECLARATIONS

The information provided below contains individual declarations of the project partners that were made during the interviews conducted by KATHOLIEKE UNIVERSITEIT LEUVEN in March 2022. The project partners were informed that the goal of the interviews is to gather the most up-to-date information about their personal data processing activities within the project (past, present and foreseen), assess their compliance with the EU privacy and data protection requirements, identify the issues that have to be remedied, if any, and advise on remedial actions. Questions and information from the project proposal is provided in italic font. Declarations of the partners and additional comments are provided in regular font.

The interviews were a part of the compliance confirmation with data protection requirements of PIMCity. The interviews serve as information and attestation on how the check-up was done. The answers are condensed to provide relevant information. The conclusion per partner can be found at the end of their respective part.

1. *2022-03-23, 11 am. ASOCIACION DE USUARIOS DE INTERNET (Miguel Pérez Subías) [association; representing end users]*

- *How many times have you organised a workshop?*
  1 workshop so far. About the future workshops: not sure; idea is one more, but not certain now.

  In the end, one workshop was organised.

- *Have you used a privacy policy for the workshop?*
  They relied on the guidelines provided by KUL.

- *Proposal mentions that AUI will deal with end users and that AUI brings "internet users": PDK modules developed within the first development cycle will be tested using at least 1000 early adopters provided by AUI through their beta citizens platform. Were their data used? Did you have their consent/other legal bases to use their data within PIMCity? Are you planning to use the consent form/privacy policy as provided in deliverables?*

  In the end, these users will be registered at the platform. This does not fall under AUI as AUI does the advertising campaigns e.g. on social platforms.

- *Pilot 3: "To enlarge the customer base, AUI will provide its community of users to complete the user participation". Is it the same as above? Were their data used? Did you have their consent/other legal bases to use their data within PIMCity? Are you planning to use the consent form/privacy policy as provided in deliverables?*

  They are not going to share their database with project partners.

- *T1.3 TID and FW will engage the pilot users and <u>AUI and ERMES will measure and evaluate their feedback</u>. Can you describe personal data processing happening here and documentation concerning it?*

  The idea is to do some surveys that they will put on platform to invite subscribers of EasyPIMS for people that fill in this survey. They do not need email, name, just sociodemographic data. Just data that users have filled in on the platform.

  In our case the evaluation is limited to the tool www.easypims.eu through this form www.easypims.eu/survey . Here, you are only asked for the User ID provided by this tool in order to assign you the points for your participation in the sweepstakes.

- *T2.1 IAB will provide the feedback of the service providers, involving some of their partners in the validation of the design and AUI will provide users' feedback (note that, unless specifically explained in the task description, IAB will be part of all the technical tasks to ensure the result is in line with the industry expectations, AUI will do the same for the final users and KUL will check the results from legal and ethics perspectives). Can you describe personal data processing happening here and documentation concerning it?*

  AUI will organise a focus group and will process names and other personal data. They will invite only people that are associated with AUI (members of association, Madrid region. AUI confirms they have legal bases to contact them. It is important that AUI will control this data processing individually/autonomously, i.e. personal data will not be shared with PIMCity. AUI will only share anonymised results.

- *T2.2 AUI will collaborate to the definition of the privacy metrics and Transparency Tags by involving end users. Can you describe personal data processing happening here and documentation concerning it?*

  No collaboration in a sense that AUI does not process users' data for that.

- *T6.2 training and tutorials. Activities aiming at end users and society at large will be led by AUI, in accordance with their awareness and advocacy mission. Can you describe personal data processing happening here and documentation concerning it?*

  AUI does not think a registration will be necessary, perhaps will be not necessary to process data.

  This has been confirmed.

- *T6.3 community building. To start with, PIMCity community is formed by AUI's already engaged volunteers in TYPES, IAB's network of associates. Can you describe personal data processing happening here and documentation concerning it?*

Not targeting individuals, only organisations to disseminate information in the area. As such, no personal data is processed.

- *Any other data processing performed/planned? Please describe. Are we missing something?*

    - For newsletter and events, project (website subscriptions and workshops).
    - Management of the website. AUI uses the privacy policy that was drafted taking into account KUL's guidelines.
    - For EasyPIMS contact with prize winners:
        - name,
        - ID document – to send money and identify the person: this will be covered by PIMCity privacy policy.
        AUI has emails of winners, they contact them and ask them to prove identity to send a card from Amazon. Just email and some document proving identity. To show relevant authority that AUI paid to x people (destination of the money). It will begin around the 1st week of May.

    - Surveys (EasyPIMS privacy policy).
    - Focus group: email, name, sociodemographic data. AUI shares with PIMCity only anonymised data.

AUI does not use any EasyPIMS/PIMCity data for anything else outside PIMCity.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities with regard to data that will be processed on the platform?*

No. Not a joint controller, only a processor. Processes for very specific purposes. AUI does not decide on the means and purposes of the processing.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: When handling the workshop data, AUI acted as a data controller themselves: no issues detected. Eventually they may be acting as a data processor within PIMCity. In such a case it is recommended to enter into a data processing agreement. Specifically, into a data processing agreement with PIMCity data controller.

Two potential issues identified:
- Decision regarding processing of identity documents has to be made and, if relevant, privacy policy of the platform has to be adjusted.
- That data processing agreement between POLITO and AUI has to be signed.

The relevant partners were made aware of these issues and recommendations on how to act accordingly were provided.

2. *2022-03-25, 11 am. NEC LABORATORIES EUROPE GMBH (Roberto Gonzales) [company; machine learning/analytics services; experience with extracting value from data in real time]*

Given the info in the proposal, we have to first discuss these points:

WP1 deliverables and processing of data

- *D1.1. PIMCity requirements and specifications (Editor: NEC; M6, R, CO). Report containing all necessary descriptions and specifications for developing PIMCity solutions in a user-centric, framework compliant way (T1.1) No processing of personal data involved here, is this correct?*

  NEC did not process any data here. Only AUI processed. NEC only got statistical analysis, no personal data itself.

- *D1.2. Requirements re-definition (Editor: NEC; M18, R, CO). This deliverable provides a final version of the requirements as an update to D1.1 (T1.1,) No processing of personal data involved here, is this correct?*

  NEC did not process any data here. No new personal data was used.

- *D1.3. Demonstrator design (Editor: NEC; M18, R, CO). This deliverable will provide the complete design of the pilots. (T1.3, T1.4) No processing of personal data involved here, is this correct?*

  NEC did not process any data here.

- *D1.4. Agile testing report. (Editor: GDATA; M24, R, CO). This deliverable will provide a first report of the results obtained during the continuous testing. It will include the design of the tests until this phase, the tests performed, and the feedback provided to the technical WPs. (T1.2) No processing of personal data involved here, is this correct?*

  NEC did not participate here.

- *D1.5. Demonstrators and evaluation report (Editor: NEC; M30, OTHER, PU/CO). This deliverable will release the final version of the integrated EasyPIMS platform and demonstrators. It will summarize the performance of the demonstration campaigns for both pilots and the feedback obtained from users and companies in pre-production tests. Finally, this deliverable will provide a final report of the continuous testing of components (T1.2, T1.3, T1.4) Reference to the feedback obtained from users; there is processing of personal data involved here, is this correct? Can you elaborate on this?*

To be presented in the final demonstration of the project. First, the whole platform, there will be users registered, providing data. They plan to do surveys directed from users. Everything is covered by the key privacy policy. NEC does not have access to data.

There is a model created by NEC and running in the platform. User logins, gives permission and stores data in the personal data safe. Data will be anonymized before NEC analyses it.

WP2, 4, 5

- *T2.1 NEC will contribute to the development of intelligent consent manager procedures by exploring different machine learning techniques to cluster the preferences of the different users to automatically identify typical "privacy profiles" to be offered as predefined options to not tech-savvy users. Reference to the users; there is processing of personal data involved here, is this correct? Can you elaborate on this?*

  NEC did not do this. This part of the task was dropped. Wibson, Gdata did the consent manager themselves.

- *T2.2 NEC will use machine learning techniques to classify the different websites and services No processing of personal data involved here, is this correct?*

  No processing of personal data took place.

- *T2.3 NEC will explore the use of representation learning techniques that allow the classification and analysis of users' data by representing them in an Euclidean space, without the need of sharing the real data. No processing of personal data involved here, is this correct?*

  No processing of personal data took place. All the processing was in T1.5 – demonstrators. All the other tasks in principle were technical development without data.

- *T2.4 design and development of the Personal Data Safe. Is there any processing of personal data involved here? Can you elaborate on this?*

  No processing of personal data took place.

- *T4.4 Design of knowledge extraction methods for users' data. NEC will improve its Net2Vec technology able to analyse network data in real time to generate user profiles. Is there any processing of personal data involved here? Can you elaborate on this?*

  No processing of personal data took place. This is development of algorithm. And then things are running within T1.5. So again, leads back to the same task.

- *T5.3 Personal Data Avatar Implementation. NEC will lead this task based in its experience building Net2Vec. This task comprises two steps: Interest and Gender based classification of Website content and privacy preserving profiling of the Internet users based on their browsing history. Is there any processing of personal data involved here? Can you elaborate on this?*

This task deals with integrating everything together. No processing of personal data took place.

- *T5.5 Transparency Tags Implementation. NEC will help with the integration of the ML algorithms developed within WP2. Is there any processing of personal data involved here? Can you elaborate on this?*

No processing of personal data took place. It is about companies, not people.

- *NEC will store all the data managed during the Project in the ANT cluster located in the NEC Laboratories Europe building in Heidelberg (Germany). What kind of data is stored there? Please comment.*

Anonymous data is stored here. No data coming from the project is stored within NEC. The personal data of the project, will be stored by FastWeb. FastWeb will also store data of testers.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

(the following information was provided by NEC and provides their perspective on the project, this was necessary to understand the bigger picture, but is certainly not binding nor final)

All technical partners are accessing data (in a broad sense):
- Security, infrastructure provided by FASTWEB
- Encryption of data – POLITO
- POLITO and NEC (technical coordinator): how to store the data.
- NEC decided (together with others) how the platform will operate.
- WIBSON's role: all the interaction with data buyers. Marketplace, trading engine. All selling of (personal) data. How to send data to other parties.
- Ermes has a developer role for transparency tags and web scrapers.
- All the rest access data (in a broad sense) for their purposes, if any.

According to NEC:
- IAB Spain probably does not decide anything.
- Imdea and UNIVERSIDAD CARLOS III DE MADRID are involved in market place, providing services to marketplace.
- Ermes is working on privacy tags that are about companies; they do not process any personal data for doing that. They do have influence on how the platform works.
- Lstech is doing all the user interface;
- Telefonica – not involved in the final stage;
- TapTap – the only thing they do is when user gives permission (e.g. user no 5 is interested in sports & literature), they get user ID and they provide a map that is related. Normally they do not have access to personal data. No key decisions about the platform.

After the project ends: project ends, platform (run by PIMCity partners) ends. The partners do not have access to users anymore. After the review we will delete the platform. Platform of the project is only to test that it works. Ideally there will be some cooperation but this does not have to do with the project.

- *Any other data processing performed/planned? Please describe. Are we missing something?*

NEC developed an algorithm for analysing profiles. Analysis is kind of automatic algorithm in the cloud of FASTWEB. NEC cannot go and look. NEC themselves does not perform any personal data processing activities.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: NEC did not process any personal data and as such, the applicable data protection legislation is only sparsely applicable. NEC codes analytical tools, for which the guidance provided by KUL was followed.

3. 2022-03-25, 1 pm. INTERACTIVE ADVERTISING BUREAU SPAIN (Miguel Herranz) [advertisers]

- *Any data processing performed/planned? Please describe.*

The only personal data processing activities: running workshops. They obtain info personal info such as email, name, company.
Two workshops have been conducted. The privacy and cookie policy was based on the guidance and templates as provided with by KUL.

Whether they will share it with PIMCity – not sure. But no plan to share data. They only have it themselves. Servers are in Europe. The goal is to use it for testing. But they can do it from IAB Spain.

In the end no personal data was shared.

No other activities foreseen.

- *W regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

No access, no decisions.

- *We will also ask you to provide your input for DMP and review/supplement your input for RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: IAB Spain only processed personal data for the workshops they organised. For this, the guidance and templates provided by KUL was relied upon.

4. ***2022-03-28, 9 am. FUNDACION IMDEA NETWORKS (Alvaro Garcia, Nikolaos Laoutaris) [machine learning/analytics services]***

Given the info in the proposal, we have to first discuss these points:

- *T3.1 User-centric Data Marketplace Design, D3.1. Design of the user-centric Marketplace. Led by IMDEA. Any personal data processing? Please describe.*

  No. Defining requirements did not require any personal data. No data. Can be seen in the deliverable. Survey of entities trading data in the market.

- *T3.2 Design and development of tools to understand the data value. <…> IMDEA will investigate possible frameworks for defining the value of user data in context aware or context unaware settings. Any personal data processing? Please describe.*

  No. The component is developed and can use any sort of inputs. Inputs in that case was public data set. Legal requirement in US to publish data. Typical dataset of mobility etc. Ride starts, ride ends – most accurate information. They used it to predict the demand. Geographically. But no personal data was processed.

- *T3.3 Development of an open trading engine. Any personal data processing? Please describe.*

  No. In the end, PIMCity used this model plus other models based on synthetic data to show how valuation can work.

- *T4.3 Design of methods to ensure the data provenance. In this task, IMDEA will survey work on data provenance and select an appropriate solution to be implemented as part of the toolbox. Proposals will be examined that use watermarking and/or trusted execution environments to keep track of who has seen a piece of data, and how many times. Also, provenance-by-default approaches will be examined, in which data do not leave a controlled platform, but instead, all processing takes place locally and the output is checked for **anonymity** guarantees established between sellers and buyers of information. Any personal data processing? Please describe.*

  User themself has to decide to upload. If they don't upload, then it won't work. A synthetic list of URLs was used. PIMCity used the input themselves, not IMDEA.

  There is a verification phase later, part of all implementation. All access of data is logged, as a best practise.

  You can have many to provide ways to users to verify their ownership. IMDEA did watermark verification. It's up to trading engine to use this tool. Real users could use it but the idea is not going to be exposed publicly so perhaps the trade engine may use it.

In the end, all processing of user uploaded data is done locally and then privacy preserving analytics are done on the personal data, i.e. the identity is not disclosed, no personal data is processed.

- *T4.4 Design of knowledge extraction methods for users' data. IMDEA and LST will develop Quantified self-dashboards and analytics that will provide valuable information to the user by inspecting the available data (i.e., information about their amount of movement, their level of social interactions, their sleep habits, etc.). Any personal data processing? Please describe.*

  We have no users. As such, synthetic data was used, no personal data was processed.

- *T5.3 Personal Data Avatar Implementation. Any personal data processing? Please describe.*

  Nothing.

- *T5.4 Data Marketplace Implementation. Any personal data processing? Please describe.*

  IMDEA works with Telefonica in this regard, using their user's data. The data will be aggregated. As such, IMDEA will not processing personal data.

- *WP6. Any personal data processing? Please describe.*

  No.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  No.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  According to NEC, Lstech is doing all the user interface; it is kind of done; using in the user's site; they are not doing key decisions; even if they are doing a lot of code... Is that correct?

  Yes this is correct in IMDEA's view.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: IMDEA did not process any personal data as synthetic or aggregated data was used. IMDEA provided technical solutions, for which data protection by design methodologies and guidance were followed.

5. ***2022-03-28, 11.30 am. ERMES CYBER SECURITY SRL (Stefano Traverso) [technology providers at the platform]***

Given the info in the proposal, we have to first discuss these points:

- *Pilot 1. In the first pilot GDATA, TTTWIN and ERMES will test the different modules within their already existing customer bases following an Agile methodology. Did you transfer any personal data to PIMCity? Or did you only share anonymised insights? Please describe.*

  No personal data was processed. It's only information about companies.

- *Pilot 2. FW and ERMES will explore their customer portfolio to identify at least 50 companies interested in the transparent trading of personal data. Did you transfer any personal data to PIMCity? Or did you only share anonymised insights? Please describe.*

  The aim was to contact/get in touch with 50 customers from Fastweb portfolio. That means reaching 50 people, e.g. managers of cs systems. Ermes did not get contact information. Ermes did contact customers from their own portfolio, this processing is already managed by Ermes contracts. They have their own GDPR compliance. They would not like to expose info to PIMCity. So, anything they will get from this will be anonymised, results will be aggregated. PIMCity will receive personal, nor company data.

- *Beta testers. Face-to-face meeting and engagement. 1000 active beta-testers. Any personal data processing? Please describe.*

  B2C tests. Ermes is not involved in this. No personal data was processed.

- *T1.2 Continuous testing of core components. In this task, ERMES, TTTWIN and GDATA will continuously test the PDK technological components developed in WP2, WP3 and WP4 following an Agile Methodology. Any personal data processing? Please describe.*

  No personal data was processed. For development purposes fake data can be used.

- *T1.3. TID and FW will engage the pilot users and AUI and ERMES will measure and evaluate their feedback. Any personal data processing? Please describe.*

  This is again related to their pilot. ERMES will summarise the data they got from surveys etc. but ERMES won't share the companies and their contacts. No personal data was processed.

- *T2.2 Design and development of Privacy Metrics for the Transparency Tags. Any personal data processing? Please describe.*

ERMES augmented TT to include information that Stefano showed to us. But they could use fake data. No personal data was processed.

- *T2.4 Design and development of the Personal Data Safe. Any personal data processing? Please describe.*

  Ermes is not involved here.

- *T5.2 Open API design and platform integration. Any personal data processing? Please describe.*

  No personal data was processed. Access tokens, similar to cookies. For development ERMES could use fake data. Access token per se is not fake. Fake data is the user you generate who would be associated to that token. But there may be partners such as LSTECH and WIBSON who may use access tokens.

- *T5.3 Personal Data Avatar Implementation. Any personal data processing? Please describe.*

  Fake data was used for development as well as some employees/researchers from the partners who actively worked on PIMCity.

- *T5.5 Transparency Tags Implementation. Any personal data processing? Please describe.*

  See transparency tags. ERMES collects info from data buyers e.g. name, contacts, phone no. ERMES develops the code, systems to collect and host this information. This system will be part of the back end built by WIBSON. Hard to tell whether it will be Ermes to handle this data. Everything will be deployed on POLITO and FASTWEB's data centers. However, in the moment some maintenance has to be done on the code, it will be Ermes. Then Ermes would reach the data; they can do it themselves.

  For what concerns the B2B pilot, ERMES will process
    1. personal data of customers (contact data) needed to perform the interviews.
    2. Personal data of clients' employees involved in the pilot. This processing is already described in the contract ERMES establishes with its clients.

  No personal data has been transferred thus far.

- *WP6. T6.3. To start with, PIMCity community is formed by AUI's already engaged volunteers in TYPES, IAB's network of associates, and TTTWIN's, GDATA's and ERMES' communities of early adopters. Representatives from public organisations and companies will be mobilised and managed by partners ERMES and UC3M. Any personal data processing? Please describe.*

  No personal data processing.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

No.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  According to NEC, you do not process any personal data but you do make decisions about the platform in general. Is that correct?

  "Substantially true". In the end only two actual deployers: POLITO and FASTWEB. But in the event, something unexpected would happen, they would ask for a specific developer to investigate. But for sure the leaders should be POLITO and FASTWEB.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: ERMES did not process any PIMCity data subject's personal data. ERMES provided technical solutions, for which data protection by design methodologies and guidance were followed. ERMES did use their own customer's personal data, for which they are ultimately responsible, yet they can rely on KUL guidance and templates.

6. *2022-03-28, 1 pm. WIBSON (Rodrigo Irarrazaval)*

No info in the proposal. According to NEC, WIBSON's role is all the interaction with data buyers. Marketplace, trading engine. All real selling of data. How to send data to other parties.

  WIBSON is processing different technologies but not the data itself. Trading engine shows what you have sold for what purpose, etc. Trading engine also works with personal consent manager, to reach sellers of certain segments. In the last two months they were asked to do task manager (which stores tasks of each user).

  WIBSON does not get access to the personal data safe.

Hence, broad questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  No.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  WIBSON only provides technical infrastructure. No processing of personal data takes place.

  Not a joint controller.

- *We will also ask you to **provide** your input for **DMP** and **review** your input for **RRI** (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: WIBSON did not process any personal data. WBISON provided technical solutions, for which data protection by design methodologies and guidance were followed.

7. *2022-03-28, 3 pm. LSTECH ESPANA SL (Evangelos Kotsifakos, Xavi Olivares) [machine learning/analytics services]*

Given the info in the proposal, we have to first discuss these points:

- *T4.1 Design and development of data aggregation pipelines. Any personal data processing? Please describe.*

   LST is developing data aggregation tool that will be used by telco provider (Telefonica) in order to anonymise, aggregate their data. Will be done in their premises. LST provides the tool, software but no access to their data. There is supposed to be real data but that's up to Telefonica.

   This data is supposed to be used by other modules as well. No processing of personal data takes place.

- *T4.2 Generation of tools for easy data portability and control <…> LST will provide support for the aggregation of such portable data. Any personal data processing? Please describe.*

   This task LST barely has any contribution.

- *T4.4. IMDEA and LST will develop Quantified self-dashboards and analytics that will provide valuable information to the user by inspecting the available data (i.e., information about their amount of movement, their level of social interactions, their sleep habits, etc.). Any personal data processing? Please describe.*

   This is a dashboard that will visualise some data. LST does not have possession of data but they come from other modules. E.g. Telefonica will anonymise and it will come here. Visualised but anonymised. Data will remain in Telefonica. Telefonica will send only anonymised data.

   User accesses dashboard and can see their data, e.g. location data. But also, not stored by this module but in the PDS. No processing of personal data takes place.

   When there will be testing in the next months, data will be received. In any case this data is not stored on LST. LST has technology, provides dashboard, dashboard is running on a server of POLITO and on Fastweb's. As LST they do not have access it and won't have it normally. Only the user can login and check their data.

- *T5.1 Development of PIMCity Cloud controller <…> FW in collaboration with LST will define the technical requirements for interoperability with third-party modules or components <…> LSTECH will provide the environment setup Any personal data processing? Please describe.*

  This is infrastructure, nothing to do with neither data, nor tech or software. In this task LST helps with environment and technology. Development procedures such as deploying modules etc. In this task probably nobody deals with personal data. No processing of personal data takes place.

- *T5.3 Personal Data Avatar Implementation. LST will develop the User Dashboard to allow the user to check and modify her profile. Any personal data processing? Please describe.*

  Using technologies that need cookies. But LST does not host the website and LST does not have access.

  LST created the technology for cookies, storage of access tokens and model creation. However, they did not run this technology and have no access to the data (POLITO and FastWeb do have access).

  LST would not be able to access anything from any user. Nobody can access this data.

  All the references here are to the data that is *necessary* to run the website. No extra data about the user.

- *T5.4 Data Marketplace Implementation. LST will contribute to the development of the UD in collaboration with GDATA. Any personal data processing? Please describe.*

  No active involvement. No personal data processing.

- *T5.5 Transparency Tags Implementation. LST will provide the User Interface. Any personal data processing? Please describe.*

  This is a subset of the technology created, no personal data was processed.

- *WP6. Any personal data processing? Please describe.*

  Nothing.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  Nothing. And no plans.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

Not applicable. No personal data was processed.

- *We will also ask you to **review** your input for **DMP** and **provide** input for RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: LST did not process any personal data. LST provided technical solutions, for which data protection by design methodologies and guidance were followed.

8. ***2022-03-29, 11 am. TELEFONICA INVESTIGACION Y DESARROLLO SA (Ioannis Arapakis) [information collectors, together with Fastweb]***

Given the info in the proposal, we have to first discuss these points:

- *WP1 starts by methodologically studying the needs, expectations and reluctances of both the potential end users and industry stakeholders. This will deduce technical and functional specifications, the use cases and the evaluation procedures. Upon all these, three close-to-market pilots will be designed and carried out. The first one is focused on the management of personal data from internet users (B2C scenario) and will be handled by the network operators (FW and TID) and supported by the rest of the partners. Can you please comment on this. Proposal says TID will provide anonymised data (and KUL also advised so) from Telefonica = no personal data provided for PIMCity. Is this correct?*

For mobility Telefonica did not consider raw data from customers. Telefonica considered sectors. E.g. not exact location data. It's more about at a certain point in time, e.g. 4-hour interval these are 4 locations are visited. But again, these are sectors, not exact locations. This gives Telefonica an idea more or less about the most visited areas.

And Telefonica do not share this (raw) information. Telefonica provided some aggregated information. Nothing that would identify users. No personal data was shared with the consortium. Information provided on the (aggregated) sector level.

For this analysis they are looking into places with verified traffic e.g. squares.. Not housing areas. That is as far as they can go with anonymised data. This is useful for analytics without going to the personal level.

This is more or less concerning whole project.

- *T1.3 TID and FW will engage the pilot users and AUI and ERMES will measure and evaluate their feedback. Please comment. Did you share anonymised data?*

There were no real time experiments conducted. For the pilot, historical data Telefonica collected as operator was used for which they complied through their internal GDPR team. Nothing was transferred to PIMCity.

- *T2.3 Development of privacy preserving analytics. TID will work on new, privacy-preserving machine learning methods to compute analytics useful to internal or external businesses,*

based on data extracted from users, <u>without compromising data ownership and anonymity</u>. Please confirm you have worked on/provided PIMCity with anonymised data only.

This question is not applicable to us. Telefonica used privacy-preserving machine learning on data, but they did not share any (personal) data with PIMCity.

- *T3.2 Design and development of tools to understand the data value. TID will apply and extend current research on data valuation for web-related activity on new advertising protocols that are based on real-time bidding engines and auctions, onto new datasets available from users. <…> TID was supposed to estimate the value of end users' data in the web (p. 18) Please confirm you have worked on/provided PIMCity with anonymised data only.*

Not applicable. For the creation of the data value estimation tool, only anonymized data was used. This tool was not integrated into PIMCity. No processing of personal data took place.

- *TID is a leader of WP4. Please confirm no personal data processing took place or that you have worked on/provided PIMCity with anonymised data only.*

No processing of personal data took place.

- *Pilot 3 testing: feeding it with the data already available at the operators and involving several thousands of real users <…> Fed by data already available at the operators like the browsing history, the call and position log of the customers, it will let the users incorporate new personal data (i.e., the gender, age, preferences, interests, etc.) Proposal says it will be anonymised data (and KUL also advised so) from Telefonica = no personal data provided for PIMCity. Is this correct?*

No processing of personal data took place.

- *TID will store all the data managed during the Project in appropriately designed and protected servers in one of Telefonica's buildings in Boecillo, Valladolid, Spain. What kind of data is stored there? Please comment.*

Some people from PIMCity have secure access to a protected server within TID's VPN to install PIMCity tools, so that they can later test them. But not to personal data. TID needs them to install tools, create infrastructure. Like creating a virtual environment of PIMCity to which later anonymised data can be introduced.

- *Beta-testers. Face-to-face meeting and engagement (AUI, TTTWIN, GDATA, UC3M, TID, FW, ERMES). 1000 testers. Proposal says TID will provide anonymised data (and KUL also advised so) from Telefonica = no personal data provided for PIMCity. Is this correct?*

No processing of personal data took place.

- *Pre-production testers: Individual: promotion of the PIMCity platform through existing communities (TTTWIN, GDATA, TID, FW). 14 000 testers. Proposal says TID will provide*

anonymised data (and KUL also advised so) from Telefonica = no personal data provided for PIMCity. Is this correct?

No processing of personal data took place.

- *Recruitment into PIMCity will be carried out by partners TID, FW, AUI and IAB, supported also by Universities. Other partners may also participate in recruitment campaigns. Recruitment will be made from partner's network of users and collaborators. In the case of TID and FW, they will offer the EasyPIMS solution to a subset of their customer. In all cases, the involved partners will appoint the specific end-users and pilot participant staff for the purpose of the project. The pilot coordinator will define all activities of selection of specific volunteers as participants and will coordinate the process of selection. Can you please comment upon this.*

Not relevant. No contractual commitment.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

No.

- *W regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

Telefonica has no access to the platform; they did not have a decisive influence on the set-up. No processing of personal data took place.

- *We will also ask you to **review** your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: Telefonica did not process any personal data except for data it already had in its possession. From this data, aggregated analytics were shared. These analytics cannot be seen as personal data.

Telefonica provided technical solutions, for which data protection by design methodologies and guidance were followed.

9. ***2022-03-30, 9 am. UNIVERSIDAD CARLOS III DE MADRID (Rubén Cuevas) [machine learning/analytics services; a university with a strong background in the area of online advertising, internet measurements, online social network analysis, and with clear exploitation plans to incorporate the technological advances acquired in PIMCity in their postgraduate programs and in their academic publications]***

Given the info in the proposal, we have to first discuss these points:

- *Beta-testers. Face-to-face meeting and engagement. 1000 subjects. Any personal data processing? Please describe.*

  UC3M will send through the email list of the university. But will not handle beta-testers. No processing of personal data took place.

- *T2.2 Design and development of Privacy Metrics for the Transparency Tags. UC3M will contribute with crawling tools to retrieve data through active measurement techniques. Please confirm there was/is no personal data processing.*

  There are tools designed but they were never used for PIMCity at the end. Not collecting any personal information. Just gather information of the webpage. No processing of personal data took place.

- *WP3. Please confirm there was/is no personal data processing.*
    - *T3.1 User-centric Data Marketplace Design*
    - *T3.2 Design and development of tools to understand the data value*
    - *T3.3 Development of an open trading engine*
    - *D3.1. Design of the user-centric Marketplace (Editor: IMDEA; M9, R, PU). This deliverable will provide a design of the Marketplace to be used by the project (T3.1)*
    - *D3.2. Design of data valuation tools and trading engine (Editor: UC3M; M9, R, PU). This deliverable will provide the first complete design of the data valuation tools and the trading engine by taking into account the envisioned Marketplace (T3.1, T3.2, T3.3)*
    - *D3.3. Final design and preliminary version of the data valuation tools and trading engine (Editor: UC3M; M15, OTHER, PU). This deliverable will provide the final design of the data valuation tools and the trading engine. Moreover, a preliminary version of the software will be delivered (T3.2, T3.3)*
    - *D3.4. Release of the data valuation tools and trading engine (Editor: UC3M; M24, OTHER, PU). This deliverable will provide the release the final software of the data valuation tools and the trading engine along with a user guideline for the utilization of the different tools (T3.2, T3.3)*

  No processing of personal data took place. Only aggregated data gathered from the platform e.g. the value of data from users in place X. Open trading engine does not have data itself, but there will be communications.

- *T5.3 Personal Data Avatar Implementation. Please confirm there was/is no personal data processing.*

  UC3M does not handle anything.

- *T5.4 Data Marketplace Implementation. Please confirm there was/is no personal data processing.*

  UC3M does not handle anything. Just provide values of audiences.

- *T5.5 Transparency Tags Implementation. Please confirm there was/is no personal data processing.*

  UC3M does not handle anything.

- *T6.2: Training and Tutorials. Please confirm there was/is no personal data processing.*

  No.

- *T6.3: Community building. Please confirm there was/is no personal data processing.*

  No.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  No.

- *W regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  No influence on the purposes and means of processing so not a (joint) controller.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: UC3M did not process any personal data. UC3M provided technical solutions, for which data protection by design methodologies and guidance were followed.

10. **2022-03-30, 11 am. POLITECNICO DI TORINO, the Coordinator (Martino Trevisan – Giorgio Prette) [machine learning/analytics services / top universities and research centres]**

Given the info in the proposal, we have to first discuss these points:

- *T2.1 Design and development of an easy-to-use consent manager. Any personal data processing? Please describe.*

  For designing and development Polito did not use data. Formally the USE of this one is done in WP5. WP2 included only technical development with no data. However, Polito steered the project and coordinated between the consortium partners.

- *T2.2 Design and development of Privacy Metrics for the Transparency Tags. POLITO will define, develop and test algorithms to automatically build the privacy metrics. In particular,*

POLITO will contribute with a module that will extract the privacy metrics by actively scraping web pages, and identify privacy threats (Active Scraper for Monitoring). Any personal data processing? Please describe.

Same.

- *T2.3 Design and development of privacy preserving analytics methods and algorithms <…> POLITO will lead the task and will contribute to the development of a privacy preserving module that lets independent companies share data in a privacy preserving manner without violating the ownership of data and the anonymity of users, focusing on zero-knowledge proof or k-anonymity approaches. Any personal data processing? Please describe.*

Same.

- *T2.4 Design and development of the Personal Data Safe. POLITO will lead this task and will develop, with the help of NEC and ERMES a general data storage system able to keep the data of the users in a privacy preserving way. Any personal data processing? Please describe.*

Same.

- *D2.1. Design of tools to improve user's privacy. Any personal data processing? Please describe.*

Same.

- *D2.2. Final design and preliminary version of the tools to improve user's privacy. Any personal data processing? Please describe.*

Same.

- *D2.3. Release of tools to improve user's privacy. Any personal data processing? Please describe.*

Same.

- *T5.1 Development of PIMCity Cloud controller. FW, POLITO and LST will design and host PIMCity on the FW Cloud platform. <…> POLITO will host the cloud infrastructure in the new SmartData@PoliTO data centre Any personal data processing? Please describe.*

Demonstrators run in FASTWEB. Disk and computers are in FASTWEB. FASTWEB gives access to servers where they run their demonstrators and where there will be personal data of EasyPIMS.

Here we are talking only about platform data.

- *T5.2 platform integration.*

The same as T5.1. More or less the same piece of work.

- *T5.5 Transparency Tags Implementation. POLITO will work on the integration of the Transparency tags with EasyPIMS UD. Any personal data processing? Please describe.*

  This one is similar to WP2. They have designed some piece of code that shows information about websites. Some information about BBC website, FB website. But there is no personal data here. Only data about public websites.

- *T6.2: Training and Tutorials. Any personal data processing? Please describe.*

  They will create some videos to create infrastructure. But there won't be personal data here. If there will be interactive session, then maybe there will be personal data for which the guidance provided by KUL will be followed (privacy policy, cookie notice).

- *T6.3: Community building. Any personal data processing? Please describe.*

  Everything will be handled by AUI. POLITO does not do any processing here

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  The data that user can insert into a platform is very restricted, structured. In EasyPIMS the privacy policy involves FASTWEB, POLITO. POLITO is responsible for managing the platform, which is hosted on FASTWEB.

- *With regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  FASTWEB and POLITO: to clarify the relationship. According to POLITO, FASTWEB is only hosting. FASTWEB just gives computing power and the cloud environment.

- *We will also ask you to review your input for DMP and RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: Polito, as lead of PIMCity, has a deciding influence on the means and purposes of processing of PIMCity. In the end, they are responsible for the how and the why of the processing and are thus controller of the project. This has been reflected in the privacy policy.

Polito is thus responsible for complying with data protection legislation, for which KUL provided guidance and templates throughout the project.

The only processor of Polito for PIMCity is FastWeb. For this relation, KUL advised to sign a data processing agreement.

11. 2022-03-31, 11 am. FASTWEB SPA (Guglielmo Bondioni) [largest alternative fixed-line telecommunications provider in Italy]

Declaration of FASTWEB:

1) Runs a demo of a project that is being developed by Ermes. This demo will run with FW network's business partners. Not exactly their customers but they bring products to the market (small enterprises). So, they are both customers and business partners. In this context FW will not process any personal data.

2) Extracts data from FW networks and uploads it to platform for processing. To test some software components that are being developed by other members of consortium. This data will be only used for a limited period of time, for testing purposes. But at least at the start it's personal data because these are data extracted from network traffic. Idea/goal of Marco, Martino and Roberto was that data will be anonymised. But FW will have to process the data to anonymise it. So some processing will be inevitable.
   a. it is not directly identifying data; associated with an ID
   b. before sharing the data with the Consortium, they will anonymise it.

3) Cloud computing platform for consortium to deploy EasyPIMS. FW will not access directly EasyPIMS, will not manage applications or even the machines. FW just provides infrastructure. FW will store the data. And they do have degree of control of infrastructure. Technically FW people can access the data. Fastweb is a processor for Polito, for which a data processing agreement must be signed.

Given the info in the proposal, we have to discuss these points:

- *WP1 1ˢᵗ pilot <…> three close-to-market pilots will be designed and carried out. The first one is focused on the management of personal data from internet users (B2C scenario) and will be handled by the network operators (FW and TID) and supported by the rest of the partners. Any personal data processing? Please describe.*
   - *T1.3 TID and FW will engage the pilot users and AUI and ERMES will measure and evaluate their feedback.*

   This is point 1 – partnership with Ermes. No personal data processing.

   - *T1.4 Enterprise pilot deployment and demonstration [Task Leader: ERMES Participants: All] (M15-M30). This task will demonstrate and test EasyPIMS platform with real business customers. We will design and implement the environments for the testing and demonstration of the PIMCity components in the business segment of FW network.*

   This is point 3. FW provides cloud platform; rest of consortium deploys software. FW is involved because of its processing.

- *Pilot 2: B2B testing of the PDK components. The second pilot is devoted to check the usability and versatility of the different components in the B2B operation of ERMES. To this end, FW and ERMES will explore their customer portfolio to identify at least 50 companies interested*

in the transparent trading of personal data. <…> In the second one, ERMES and FW will demonstrate the PIMCity technology (B2B scenario), testing the technology with some of their industrial customers. Any personal data processing? Please describe.

This may be a different phase of the same task (T1.3)

- *Pilot 3. Testing with Telefonica and Fastweb customers. FW will select 10.000 of their residential customers through its online forums and social media followers. Any personal data processing? Please describe.*

This was not executed, but substituted with aggregated network data as mentioned in point 2.

- *Beta testers. Face-to-face meeting and engagement (AUI, TTTWIN, GDATA, UC3M, TID, FW, ERMES). 1000. Any personal data processing? Please describe.*

Not applicable.

- *Pre-production testers. 14 000. Individual: promotion of the PIMCity platform through existing communities (TTTWIN, GDATA, TID, FW). Corporate: Face-to-face meeting and promotion through FW's service offering (FW, ERMES) Any personal data processing? Please describe.*

Fastweb did not do anything here.

- *WP5:*
  - o *T5.1 Development of PIMCity Cloud controller. Task lead. Any personal data processing? Please describe.*

    Until now no personal data; just technical support and consultancy.

  - o *T5.2 Open API design and platform integration. Any personal data processing? Please describe.*

    FW did not participate. No personal data involved definitely.

  - o *T5.3 Personal Data Avatar Implementation. Any personal data processing? Please describe.*

    Same.

  - o *T5.4 Data Marketplace Implementation. Any personal data processing? Please describe.*

    Same.

  - o *T5.5 Transparency Tags Implementation. Any personal data processing? Please describe.*

Same.

- o *D5.1. Design of the cloud controller, open APIs, PDA, TT and data Marketplace. Editor. Any personal data processing? Please describe.*

  Same.

- o *D5.2. Release of the cloud controller, open APIs, PDA, TT and data Marketplace. Any personal data processing? Please describe.*

  Same.

- *A redundant copy will also remain at Fastweb premises to ensure data is not lost in case of disasters. Any personal data processing? Please describe.*

  Data of the platform. Processor.

Other questions:

- *Any other data processing performed/planned? Please describe. Are we missing something?*

  N/A.

- *W regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  Fastweb sees itself as a processor of the personal data of PIMCity through its cloud hosting.

- *We will also ask you to **review** your input for DMP and **provide** input for RRI (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: Fastweb must be seen as a processor to Polito, the controller of the project. Fastweb provides cloud services to host the PIMCity platform (EasyPIMS). While Fastweb decides internally on the means of processing, their involvement is strictly limited to the PIMCity purposes. Fastweb services are auxiliary to the main purposes.

A data processing agreement must be signed between Fastweb and Polito, which KUL has advised.

12. 2022-03-31, 1 pm. TAPTAP (Álvaro Mayol)

No info in the proposal.

- *Any data processing performed/planned? Please describe.*

  Developing demonstrator; no data transfer or collection or processing.

No access to EasyPIMS data.

- *W regard to joint controllership: will you have access/control over overall PIMCity data? Do you decide how it will be processed (technical means) together with other partners like POLITO? Do you have a say in deciding for which purposes the data will be processed? Can you describe your activities w regard to data that will be processed on the platform?*

  Not a joint controller.

- *We will also ask you to **provide** your input for **DMP** and **RRI** (RRI concerns e.g. gender equality, public outreach; needs specific details; we will send a separate email).*

Conclusion: TAPTAP did not process any personal data. TAPTAP provided technical solutions, for which data protection by design methodologies and guidance were followed.

13. KATHOLIEKE UNIVERSITEIT LEUVEN

N/A. Did not process any personal data during the project, not a joint controller of the platform.

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CONCLUSION

D7.5 illustrates that the activities within the PIMCity project were compliant with legal and ethical requirements, particularly with the relevant EU privacy and data protection requirements.