

POPD-Requirement No.3

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Executive Summary

Deliverable D10.3 addresses the ethical requirement of the protection of personal data in the ITFLOWS Project required in the Ethics Summary Report sent by the European Commission on 21st November 2019. Section 1 explains the role of the ITFLOWS Data Protection Advisor, his appointment and his expertise. Section 2 provides the confirmation of the appointment of Data Protection Officers and the data protection policies of the ITFLOWS Partners involved in conducting the interviews with migrants. Section 3 details the sources of data used in ITFLOWS. Section 4 explains the anonymisation techniques that will be implemented to minimise the risk of identification. Section 5 describes the technical and organisational measures that will be implemented to safeguard the rights and freedoms of the data subjects/research participants. Section 6 provides the security measures that will be implemented to prevent unauthorised access to personal data or the equipment used for processing such data. Lastly, Section 7 details the lawful basis for processing previously collected data in ITFLOWS.

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Abbreviations

CRI: Associazione della Croce Rossa Italiana

DPA: Data Protection Advisor

DPO: Data Protection Officer

EMT: EUMigraTool

EUI: European University Institute

FIZ: FIZ Karlsruhe – Leibniz-Institut für Informationsinfrastruktur GmbH

GDPR: General Data Protection Regulation

IAI: Istituto Affari Internazionali

IDT-UAB: Institute of Law and Technology - Autonomous University of Barcelona

IEB: Independent Ethics Board

IUC: Interview's unique code

NER: Named Entity Recognition

NGOs: Non-Governmental Organisations

OCC: Associació Open Cultural Center

OIT: Oxfam Italia Onlus

UAB: Autonomous University of Barcelona

VPN: Virtual Private Network

Introduction

The purpose of this Deliverable is to provide a response to the ethical requirements imposed by the European Commission regarding the protection of personal data in ITFLOWS. Measures addressed at minimising data protection risks are presented in this Deliverable. They build upon previous work presented in Deliverables D2.1 and D2.3. The measures adopted include the appointment of the ITFLOWS Data Protection Advisor; the confirmation of the designation of Data Protection Officers in the institutions responsible for the processing of personal data and their data protection policies; the assessment of the data sources used in ITFLOWS to evaluate whether they are publicly available and free to use; the adoption of anonymisation techniques; the implementation of technical and organisational measures to safeguard the rights and freedoms of data subjects/research participants as well as security measures to prevent access to unauthorised access to personal data; and the description of the legal basis for the processing of previously collected personal data.

Lastly, monitoring procedures have implemented according to the ethics monitoring strategy designed for the project to ensure ethical and legal compliance with the data protection legal frameworks applicable to the project. To this end, monitoring activities have been conducted by the Independent Ethics Board (IEB) and the Data Protection Advisor (DPA).

SECTION 1 – Appointment of an ITFLOWS Data Protection Advisor (DPA)

1.1 The role of the DPA in ITFLOWS

In the context of the ethical strategy designed for the project by the ethics lead partner, strong monitoring structures and procedures have been set up to strengthen compliance with the human rights, legal and ethical framework identified for the project (see D2.1). Concerning the protection of personal data in ITFLOWS the appointment of a Data Protection Advisor (DPA) was foreseen with the aim of assisting and supervising the ITFLOWS Consortium partners in any issues along the lifecycle of the project that may raise data protection risks from a legal, ethical and societal perspective. It is relevant to highlight that the role of the DPA in ITFLOWS does not entail any type of functions as described in Article 37 of the GDPR.¹ However, it must be acknowledged that tasks assigned to the ITFLOWS DPA are inspired by the tasks corresponding to data protection officers' tasks contained in Article 39 of the GDPR,² which have been adapted to the project.

The ITFLOWS DPA is proactively involved in monitoring and providing advice to the Consortium in relation to all data protection and privacy issues posed by the research activities foreseen within the project. In particular, the DPA will be performing the following tasks during the whole lifecycle of the project:

- To supervise the adequate use and processing of personal data by all ITFLOWS partners during the 36 months of the project;
- To advise on data protection matters during the Consortium meetings;
- To provide consistent procedures for the data processing activities conducted by all ITFLOWS partners;
- To supervise that the development of the technological results (the EUMigraTool) has no impact on data protection and privacy rights of the individuals;
- To review all Deliverables that pose data protection concerns and produce specific data protection reports before every annual meeting.

¹ Article 37 GDPR. See <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

² Article 39 GDPR. See <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

1.2 Formal appointment and justification of expertise

Dr. Jonathan Andrew has been appointed as ITFLOWS DPA. The formal appointment of Dr. Andrew as ITFLOWS DPA took place during the second Steering Committee Meeting of the project which took place virtually on 3 February 2021.

Dr. Jonathan Andrew is an Associate Research Fellow at the Geneva Academy, where he conducts research on the impact of emerging digital technologies, such as the development of social media channels, on the promotion and protection of human rights. In this capacity he has been engaged as Advisor to the UN Special Rapporteur Clément Voule of OHCHR Special Procedures. He is also a Co-Editor at the University of Geneva for the publication 'Human Rights Responsibilities in the Digital Age' with Hart Publishing, Oxford. He was previously employed at the European University Institute (EUI) as Project Manager for SURVEILLE FP7, a cross-disciplinary collaborative research project funded by the European Commission, where he focused on the impact of the surveillance of mobile devices on privacy, data protection and freedom of peaceful assembly and association. Before joining the EUI, he worked as a Senior Legal Adviser with the Danish Refugee Council. His professional experience includes consulting in IT and business process re-engineering.

Dr. Andrew holds a PhD in Public International Law from the European University Institute and the Academy of European Law's Diploma. His doctoral thesis examined the concept of locational privacy in relation to human mobility, focusing on how the classification and terminology of technologies influence the construct of legal metaphors in bridging gaps in applying existing context and precedent. His CV can be found in Annex 1 of this Deliverable.

SECTION 2 – Confirmation of appointment of DPOs

The Coordinator of the Project (UAB) confirms that Mr. Agustí Verde Parera is the Data Protection Officer (DPO) of the UAB.³ Mr. Verde can be contacted at proteccio.dades@uab.cat.

Personal data collected at research activities will be processed under the responsibility of the partner conducting such activity. As such, research participants willing to exercise their data subjects rights can contact the partner's DPO, if one has been designated. Otherwise, they can contact the person in charge of data protection issues within the institution.

According to the information provided by the responsible partners, they have appointed the following DPOs (see Annex 2):

- Associazione della Croce Rossa Italiana (CRI): Dr. Tiziano Gerardi (contact details: dpo.privacy@cri.it)
- Associació Open Cultural Center (OCC): BUFETE ESCURA S.L.P, Carrer de Londres, 43 Bajos. Contact person: David Terns contact details: dterns@escura.com)

Responsible partners have also provided their respective data protection policies (see Annex 3). In this regard, it must be highlighted that the data protection policy of Oxfam Italia Onlus (OIT) states that “Funzione organizzativa Qualità” are in charge of data protection issues within the organisation and can be contacted at: privacy@oxfam.it.

Istituto Affari Internazionali (IAI) has informed the ethical lead partner about their internal process of designating a new DPO. It has been agreed that IAI will provide the contact details of the DPO as soon as he/she is formally appointed. The current data protection policy of this institution (see Annex 3) will be reviewed by the new DPO. If amended, IAI will submit the updated data protection policy to the ethics lead partner.

Lastly, OCC has provided a draft of its data protection policy. The final version of this policy is currently under development and will be sent to the ethics lead partner before the start of the interviews.

³ <https://www.uab.cat/web/about-the-uab/itineraries/data-protection/data-protection-officer-1345828638186.html>

SECTION 3 – ITFLOWS Data Sources

The data sources used in ITFLOWS can be classified into five broad categories (see also D1.1 and D2.3): i) primary personal data obtained during the interviews with migrants, refugees and asylum seekers; ii) primary data gathered at workshops with the Users Board, experts and other stakeholders; iii) publicly available data from Twitter and Google Trends; iv) the reuse of aggregate-level data collected from publicly available existing datasets and sources; v) the potential reuse of data from the European projects NIEM and MIPEX.

Table 1 (included in Section 1.4 of Deliverable D1.1) describes the types of data that will be used ITFLOWS and the related Task and Work Package number:

Data Type	Origin	WP
Macro qualitative (T3.1) and quantitative (T3.2) data on drivers of EU-bound irregular mixed migration in countries of origin and transit: i) indexes on economic growth, socio-economic structures and other numeric variables from selected countries of origin, data from the World Development Indicators (WDI) of the World Bank and from the OECD; ii) national-level data sources on population statistics will also be collected and used for the acquisition of relevant demographic indicators; iii) data on displacements provided by the DTM of the International Organization for Migration	Publicly Available data	WP3
Data from social media environments (T.3.3): i) Tweets; ii) Google Trends	Publicly available data	WP3
Interviews (T3.4) with adult asylum seekers/ migrants	Primary data	WP3
Quantitative data of Member States: i) German Panel Survey Data on asylum seekers and refugees (T4.1); data on secondary movements of refugees within the EU: economic and social indicators (T4.2)	Publicly available data	WP4
Data from the European NIEM Project (T4.3)	Publicly available data	WP4
Asylum and refugee applicable law and procedures (T4.3)	Publicly available data	WP4

Asylum application data (T.4.3) in the Member States obtained from data sources such as IGC (covers applications in 16 Member States); EUROSTAT (covers 32 countries); UNHCR open data; and the Asylum Information Database – AIDA (contains information on asylum procedures across 23 countries)	Publicly available data	WP4
Pan-European surveys: individual survey data (European Social Survey, Eurobarometer, World Value Survey), combined with aggregate-level data on countries (Eurostat, Word Bank, etc.) to identify micro- and macro-level factors affecting attitudes to immigrants/migration policies (T5.2)	Publicly available data	WP5
Big Data (T5.3): i) geo-referenced tweets for hate speech content; ii) geographically disaggregated data at the destination country level	Publicly available data	WP5
Open-intelligence data sources (T6.1): video content; web news from mainstream media sources; social media (mainly Twitter)	Publicly available data	WP6
Data gathered from the organisations that will test the tool (T7.3)	Primary data	WP7
Participatory workshops data	Primary data	WP3 WP6 WP7 WP8

Table 1. Types of data.

Additionally, Table 2 (included in Section 1.4 of Deliverable D.1.1) provides the publicly available existing datasets and sources that will be used in ITFLOWS:

Source	Type of data	Link
UNHCR	Migration - IDPs, Refugees, Asylum seekers, Situation and camp reports	https://www.unhcr.org
FRONTEX	Irregular crossing	https://frontex.europa.eu
IOM Displacement	IDPs and Returnee IDPs	https://displacement.iom.int/
iDMC	IDPs by reason (conflict vs disaster)	https://www.internal-displacement.org
HDX	Humanitarian Data Exchange database	https://data.humdata.org
ACLED	Conflict events	https://acledata.com
EMDAT	Climate and other	https://www.emdat.be/

	disasters	
ECMWF	Climate data	https://www.ecmwf.int
WDI	World Bank World Development indictors	https://databank.worldbank.org
WB Governance Indicators	Background and Institutional	https://info.worldbank.org
European Social Survey	Attitudinal survey	https://www.europeansocialsurvey.org/
European Value Study	Attitudinal survey	https://europeanvaluesstudy.eu/
Eurobarometer	Attitudinal survey	<a href="https://ec.europa.eu/commfrontoffice/public
opinion/index.cfm">https://ec.europa.eu/commfrontoffice/public opinion/index.cfm
Eurostat	GDP per capita, real GDP growth, unemployment rate	https://ec.europa.eu/eurostat/data/database
OECD	Migration statistics - Database of immigrants in OECD countries	https://stats.oecd.org/
AIDA	Migration - IDPs, Refugees, Asylum seekers	https://www.asylumineurope.org/
Eurostat	Unemployment rates, Destination, Education, Income, Gender ratio, Age of inhabitants, Marriage rate, Minimum wage, Gini-Coefficient, Lt- unemployment	https://appsso.eurostat.ec.europa.eu https://ec.europa.eu/eurostat/
IPC Food Security	Food security data	http://www.ipcinfo.org
City Population	Population data	https://www.citypopulation.de
GDELT	News event data	https://www.gdeltproject.org/
Rulers, Elections, and Irregular Governance (REIGN) dataset	Governance data	<a href="https://github.com/OEFDatascience/OEFDat
aScience.github.io">https://github.com/OEFDatascience/OEFDat aScience.github.io
IMF	All economic indicators	https://data.imf.org/
ILO	All economic, demographic indicators	<a href="http://www.fao.org/economic/est/statistical
-data/en/">http://www.fao.org/economic/est/statistical -data/en/
Google Trends	Selected keywords	https://trends.google.com
IOM Displacement Tracking Matrix Surveys on Migration Flows	Reports on migrant presence & profiles, info on flows, routes, and journey	https://dtm.iom.int

	characteristics	
EASO Country of Origin Portal	Reports on the conditions in asylum seekers' countries of origin	https://coi.easo.europa.eu
European Country of Origin Information Network	Periodical reports, analyses, media reporting, etc. on the conditions in C.O.O. of asylum seekers	https://www.ecoi.net
Konfliktbarometer	Conflict data	https://hiik.de/konfliktbarometer/
Uppsala Conflict Data Program	Conflict data	https://ucdp.uu.se/
Open Street Maps	Geospatial data	https://www.openstreetmap.org/

Table 2. Sources of publicly available data.

Further data sources that will be used in ITFLOWS were developed in the European projects NIEM and MIPEX. However, at this stage it remains unclear whether this data reflects the outcomes of the projects and is publicly available and can be freely used. The ethical lead partner (IDT-UAB) jointly with the ITFLOWS DPA will request further information on this aspect. The aim is to evaluate if specific agreements for the reuse of such data need to be signed before their processing in ITFLOWS (see Deliverable D2.3.).

SECTION 4 – Description of anonymisation techniques

4.1 Anonymisation techniques to be applied to the interviews with migrants, refugees and asylum seekers

The ITFLOWS partners involved in conducting and analysing the interviews with migrants, refugees and asylum seekers will respect and preserve the anonymity of all research participants by complying with the *Charter of Fundamental Rights of the EU*,⁴ the *European Convention on Human Rights*⁵ and its Supplementary Protocols, the *European Code of Conduct for Research Integrity*⁶, the *General Data Protection Regulation (GDPR)*,⁷ as well as with the *Opinion 05/2014 on Anonymisation Techniques* of the Article 29 Data Protection Working Party⁸.

Two stages have been articulated to apply anonymisation techniques to the interviews with migrants, refugees, and asylum seekers:

1. In the first stage, the NGOs responsible for conducting the interviews (CRI, OIT and OCC) will share with the partners in charge of the qualitative analysis (IAI and UAB): i) an anonymised table compiling all the conducted interviews; and ii) the transcript of the interviews.
2. In the second stage, IAI and UAB will ensure that the transcripts of the interviews do not contain personal data. IAI and UAB will assess whether the content of the interview reveals or might reveal the identity of research participants. In this case, such information will be deleted from the transcript to ensure having an anonymised transcript prior to any research activity. IAI and UAB will then delete the transcript and will carry out the qualitative assessment based only on the anonymised transcript.

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12012P%2FTXT>

⁵ <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005>

⁶ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf

⁷ <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

⁸ https://ec.europa.eu/justice/article-29/documentation/opinion-recommendation/files/2014/wp216_en.pdf

4.1.1 First stage: anonymisation techniques applied by the NGOs

The interviewing teams from CRI, OIT and OCC will record the audio of the interviews to facilitate its transcription. This recording shall be used in ensuring data quality and accuracy (Article 5(1)(d) GDPR). The audio of the interview will be recorded for the sole purpose of its transcription. Thus, the recording will be deleted as soon as the transcript is finished, and in any case, no later than 24 hours after the transcription. The transcript of the interview will not contain research participants' direct identifiers, such as names. Additionally, transcribers will erase other types of personal data that clearly enables identification. This procedure is envisaged to remove personal data while keeping the value of the interview for its scientific purpose. Transcribers will receive training on what types of data must be erased.

These transcripts will be safely stored on the NGOs premises using encryption, will not be shared with any third party, and will be destroyed at the end of the project. The transcripts will only be shared with IAI and UAB in a format that is encrypted.

Technical procedure

Regarding the summary table of interviews, the technical procedure to be applied by the NGOs is **generalisation**, as it is regarded to be an efficient method to minimise the risk of *singling out*.

Interviews will be associated with a number (see coding system below) and indirect markers whose combination must not lead to the identification of the participant. Crucially, the informed consent forms gathered from all research participants will in no way be associated with the interview's unique code (IUC). The informed consent forms will be kept on the NGOs premises, which are the ones in charge of ensuring the exertion of data subjects' rights. The researchers who analyse the interviews at IAI and UAB will at no point have access to the informed consent forms to preclude any potential identification of research participants by someone other than the respective NGO.

Each interview will have an IUC, composed of one letter and six numbers. Each NGO has been assigned the following letter:

- Red Cross Italy (CRI): R
- Open Cultural Center (OCC): O
- OXFAM Italy (OIT): X

The first three numbers of the IUC will correspond to an identification number provided by each NGO to its interviewing teams. The last three numbers will correspond to the concrete number assigned to each research participant. For example, the IUC number for the twenty-fifth interview carried out by the interviewing team number 1 of Red Cross Italy will be: R-001-025.

Each interview so numbered will then be associated with the date and place of the interview, as well as with the indirect interview markers (see Table 3 below).

IUC	Date	Place	Gender	Age Group	Educational/professional background	Country of origin
R-001-025						

Table 3. Anonymised table compiling the interview markers

The Partner NGOs will evaluate if any of these interview markers combined with the information disclosed during the interview itself can lead to the identification of the research participant. In such a case, interview markers will be generalised in the following order: i) the place where the interview was conducted (e.g., Italy instead of CRI Reception Center in Catania); ii) the country of origin (e.g., West Africa instead of Niger); iii) educational/professional background (e.g., University degree instead of the name and type of degree) and iv) age group (e.g., [30-35] instead of 33). If risks of identification persist, interview markers will be erased following the same order. Gender as an interview marker should only be dropped as a last resort.

As a result, NGOs will send, in an encrypted way, two separate documents to IAI and UAB, namely: i) the table compiling all interviews, and ii) the transcript of the interviews which are only associated with the IUC but not the other interview markers.

4.1.2. Second stage: IAI and UAB's role in ensuring anonymisation

Once IAI and UAB receive both documents, they will be stored separately and kept secure in an encrypted way.

IAI and UAB researchers will ensure that the transcripts of the interviews do not identify research participants nor make them identifiable. To this end, they will assess whether the content of the interview reveals or might reveal the identity of the research participant, in which case, the information that identifies or may identify the research participant will be deleted. From a methodological point of view, the content of anonymised interviews will be based on the researchers' expertise and knowledge. Any contextual information that could be deemed personal data (i.e. related to an identifiable natural person) will be removed, and only relevant information for scientific purposes will be kept. IAI and UAB researchers will then delete the transcripts and will carry out the qualitative analysis based only on the anonymised transcript.

Analysis of interviews

To analyse the anonymised transcripts, IAI and UAB have foreseen the following procedure:

- a) The researchers involved in the second anonymisation stage – while anyways reading the interview transcripts assigned to delete personal data – will also highlight recurring important words or phrases in the text.
- b) In a first team meeting (IAI and UAB), keeping in mind the research questions and analytical framework, central categories emerging from the anonymised transcripts will be identified by set of questions (e.g., a,b,c,d,e,f).
- c) IAI and UAB researchers will then go back to a portion of the anonymised transcripts assigned to them to identify central topics related to these categories (interview indirect markers). Every researcher will compile a list of potential codes (i.e. labels representing analytical categories) with tentative code definitions.⁹

⁹ These codes are analytical devices that serve conducting the analysis of the information contained in the anonymised transcripts in a systematic way and in line with the research objectives, and

- d) In a team meeting interview indirect markers will be discussed, and a shared codebook (list of codes representing analytical categories with code definitions) developed. The shared codebook will be tested by sample coding in a shared team session.
- e) Each participant will then go back to a portion of the anonymised transcripts and use the codebook to analyze and interpret them.
- f) IAI and UAB researchers will discuss their findings and the way to quantify the survey of the data.

Research outputs

Whenever IAI and UAB refer to these interviews in scientific or policy publications, they will use the above-mentioned table containing the IUC only to identify the methodological background of research in quantitative numbers. For example, they will show how many male and female-identifying persons (incl. transgender and intersex individuals) have been interviewed percentage-wise, how many in each destination, and from which countries (or regions) of origin. As standard practice, they will also include a list of interviews at the end of publications which will identify only month/year of the date on which the interview was held, the country where the interview was conducted, gender, and country (or region) of origin. Finally, in the interpretative/analytical parts of publications they will refer to general observations and, if anonymised transcripts are quoted verbatim, they will only indicate two of the possible four indirect identity markers (gender, age group, educational/professional background, country of origin) concerning the interview.

4.2 Anonymisation techniques of Twitter data

Given the likelihood of collecting Twitter data that contains personal data, technical partners will proceed with anonymisation of the collected data to avoid the processing of any personal information of Twitter users. The preliminary approach to the anonymisation of Twitter data is as follows:

hence they should not be confounded with the IUCs referred to above.

- A method is applied to automatically remove personally identifiable information such as names and ages. Locations are not removed as they are needed for predictive purposes of the EUMigraTool (EMT).
- Depending on the dataset, other types of data such as financial information (e.g. credit card numbers or certain IDs) will be removed. This will be defined after analysing manually the data.

To this end, a named entity tagger and Named Entity Recognition (NER) will be used to find this information in the text and then replace it with a random string after the first level of preprocessing, i.e. tokenisation and cleaning. Since some useful data (e.g., locations) must be collected, a method replacing the detected personal information by its unique hash value might be used if it improves the prediction results. This method keeps the necessary information available for the machine learning model and preserves the user's privacy and data protection rights at the same time.

SECTION 5 – Technical and organisational measures to safeguard the rights and freedoms of data subjects/research participants

The ITFLOWS Consortium is committed to avoiding or, at least, minimising potential negative impacts that ITFLOWS research activities may pose. To this end, several technical and organisational measures have been taken at this stage of the project to safeguard the rights and freedoms of the data subjects/research participants:

Technical measures:

1. Anonymisation techniques will be applied to the personal data gathered from the interviews and from Twitter (see Section 4).
2. Use of encrypted storage/transmission of interview transcripts by NGOs, IAI and the UAB (see Section 4 and 5).
3. Use of CKAN as the data repository for the EMT (See Section 6).
4. Multiple security measures for the EMT will be implemented. (See Section 6).

Organisational measures:

1. Most partners in charge of conducting the interviews with migrants, refugees and asylum seekers have appointed, even voluntarily, a Data Protection Officer (See Section 2). All these partners have data protection policies in place or are at the last implementation stage (See Section 2).
2. Ethics approvals/positive opinions from the internal ethics committees/bodies of the NGOs in charge of conducting the interviews have been obtained before the start of the interviews (See Deliverable D10.2). With the aim of ensuring that the identified Ethics Authorities had all the necessary information to provide such an opinion/approval, the ethics lead partner (IDT-UAB) submitted to the involved ITFLOWS Partners, a request letter signed by the Coordinator of the ITFLOWS Project informing the Ethics Authorities of the aim of the ITFLOWS Project and the ethical requirement imposed by the Ethical Panel of the European Commission

regarding the submission of an opinion/approval by a competent Ethics Authority. In addition to this request, an information package was also attached (See Deliverable D10.2).

3. Regarding the interviews with migrants, refugees and asylum seekers, access to the informed consent forms is restricted to the individuals authorised by the corresponding NGO. Additionally, personal data gathered from the interview will not be shared with Consortium Partners. NGOs will send, in an encrypted way, two separate documents to IAI and UAB, namely:
i) the table compiling all interviews, and ii) the transcript of the interviews – after the removal of direct identifiers.
4. Developing a culture of security and data protection awareness implies that people involved in conducting the interviews know the legal and ethical requirements to ensure compliance. Therefore, a training session has been specifically designed for ITFLOWS interviews before the start of this research activity. The online training session is scheduled for the end of March 2021 and will cover multiple aspects related to how to conduct the interviews, including the ethics and legal requirements that must be observed. This training session will be recorded as source of guidance, and updated if necessary. Written training materials will also be delivered in the form of a handbook.
5. Bilateral communications and participation in meetings with partners involved in WP3. In particular, close collaboration with partners involved in the interviews with migrants, refugees and asylum seekers has been established.
6. Participation of the ethical and legal teams in technical meetings. To this end it was agreed that the coordinator urges all WP and task leaders to invite the WP2 team members to their regular and irregular calls and meetings. In addition, bi-weekly WP2 meetings have enforced internal communication.

7. FIZ Karlsruhe (FIZ) has designed a privacy statement, which is included in the official website of the ITFLOWS Project.¹⁰ There are two versions of this privacy statement. The binding version on the left side contains all the important legal and technical details but may be more difficult to read. To ease readability a non-binding version has been added on the right side. This version is shortened, excludes legal terms where possible and is generally written in a simpler way.
8. A Data Management Plan (See Deliverable D1.1) has been elaborated specifically for ITFLOWS and will be updated over the course of the project.
9. A Data Protection Impact Assessment and an Ethical and Social Impact Assessment have been conducted in order to identify risks and to provide mitigation measures (See Deliverable D2.3). The Data Protection Impact Assessment and the Ethical and Social Impact Assessment will be updated as necessary throughout the project.
10. Continuous internal monitoring activities are conducted by FIZ and IDT-UAB to ensure that the processing of personal data in ITFLOWS is developed in full compliance with the applicable legal and ethical framework, as well as according to the internal and external monitoring strategy devised for the project.
11. Regarding the external monitoring activities, the ITFLOWS IEB and the ITFLOWS DPA are proactively involved in monitoring and providing advice to the Consortium in relation to all ethical and data protection issues posed by the research activities foreseen within the project.

¹⁰ <https://www.itflows.eu/privacy-policy/>

SECTION 6 – Security measures to prevent unauthorised access to personal data

Concerning personal data collected from the interviews, it will be anonymised as explained in Section 5.1. The interview transcripts will be safely stored on the NGOs premises through encryption, will not be shared with any third party, and will be destroyed at the end of the project. The transcripts will only be shared with IAI and UAB in a format that is encrypted.

The informed consent forms gathered from all research participants will be kept securely on the NGOs premises, and their access will be restricted to the individuals authorised by the NGO. Only NGOs will be able to associate the interviews with the corresponding research participant since they are in charge of ensuring the exertion of data subjects' rights. The researchers who analyse the interviews at IAI and UAB will at no point have access to the informed consent forms to preclude any potential identification of research participants by someone other than the respective NGO.

All data transferred to the project repository will be anonymised. The partner generating the data is responsible for the anonymisation process before its transfer to the ITFLOWS repository.

Data used for the EMT will be stored in the central repository "CKAN". CKAN is a tool for creating open data websites, helping to manage and publish collections of data. It is widely used by national and local governments, research institutions, and other organisations collecting data. CKAN is open-source software, with an active community of contributors who develop and maintain its core technology. In addition, it is modified and extended by an even larger community of developers who contribute to a growing library of CKAN extensions. CKAN is built with Python on the backend and Javascript on the frontend, and uses the Pylons web framework and SQLAlchemy as its ORM. Its database engine is PostgreSQL and its search is powered by SOLR. It has a modular architecture that allows extensions to be developed to provide additional features such as harvesting or data upload. CKAN uses its internal model to store metadata about different records, and

presents it on a web interface that allows users to browse and search this metadata. It also offers a powerful API that enables third-party applications and services to be built around it.

Regarding the security measures for the EMT, the following measures will be implemented:

- Encrypted storage/transmission;
- Regular offline backups;
- Transmission only over secured/encrypted channels;
- Use of firewalls for securing the network;
- Access control with personal user accounts and permissions depending on need-to-access policy;
- Access to the data/tool only via VPN (Virtual Private Network) if deemed necessary;
- Use two-factor authentication and public/private key encryption.

SECTION 7 – Lawful basis for previously collected personal data

As stated in Section 3, the data sources used in ITFLOWS can be classified into five broad categories (see also D1.1 and D2.3): i) primary personal data obtained during the interviews with migrants, refugees and asylum seekers; ii) primary data gathered at workshops with the Users Board, experts and other stakeholders; iii) publicly available data from Twitter and Google Trends; iv) the reuse of aggregate-level data collected from publicly available existing datasets and sources; v) the potential reuse of data from the European projects NIEM and MIPEX.

Personal data gathered during the interviews with migrants, refugees and asylum seekers is primary data directly obtained from the data subjects once they have provided their informed consent (see Section 1 and 2.1 of D10.1). The lawful basis for processing personal data gathered from research participants of ITFLOWS interviews is consent.

Primary data gathered at workshops with the Users Board, experts and other stakeholders mostly refer to professional opinions and feedback. However, personal data might be gathered (such as name), and pictures can be taken and the video/audio of the session might be recorded. Therefore, an Informed Consent Form Template has been designed (see Section 2.2 of Deliverable D10.1). The legal basis for processing personal data gathered from workshops and similar research activities is consent.

Regarding the publicly available data from Twitter and Google Trends, it is important to make a distinction. While data from Google Trends is presented at an aggregate level without containing personal data, tweets may include personal information. Therefore, anonymisation techniques will be applied to the data collected from Twitter (see Section 6). The lawful basis for processing data obtained from the Twitter API is legitimate interest.

Most of the data sources reused in ITFLOWS are publicly available existing

datasets that have been originally generated by the UN Refugee Agency (UNHCR), FRONTEX, the International Organisation for Migration (IOM), the European Union through Eurostat and Eurobarometer, and the Organisation for Economic Co-operation and Development (OECD), amongst others. This reusable data is provided in an aggregate form, without containing personal data.

The other data sources that will be reused in ITFLOWS have been originated in the European projects NIEM and MIPEX. However, at this stage it remains unclear whether this data reflects the outcomes of the projects and is publicly available and can be freely used. The ethical lead partner (IDT-UAB) jointly with the ITFLOWS DPA will request further information on this aspect. The aim is to evaluate if specific agreements for the reuse of such data need to be signed before their processing in ITFLOWS (see Deliverable D2.3.).

This deliverable has been reviewed and approved by the ITFLOWS Independent Ethics Board (IEB) and the ITFLOWS Data Protection Advisor (DPA). Approval letters signed by the members of the IEB and the DPA can be found in Annex 4.

References

Legal sources

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- Charter of Fundamental Rights of the European Union. Retrieved from <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A12012P%2FTXT>
- The European Convention for the Protection of Human Rights and Fundamental Freedoms. Retrieved from <https://www.coe.int/en/web/conventions/full-list/-/conventions/treaty/005>
- 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 (General Data Protection Regulation). Retrieved from <https://eur-lex.europa.eu/eli/reg/2016/679/oj>

Guidelines

- ALLEA (2017). *The European Code of Conduct for Research Integrity*. Retrieved from https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/european-code-of-conduct-for-research-integrity_horizon_en.pdf
- Article 29 Data Protection Working Party (2014). *Opinion 05/2014 on Anonymisation Techniques*. Retrieved from https://ec.europa.eu/justice/article-29/documentation/opinion-recommendation/files/2014/wp216_en.pdf

ANNEX 1 – Dr. Jonathan Andrew (ITFLOWS DPA) CV

DR. JONATHAN ANDREW, CIPM & CIPP-E

Email: jonathan.andrew@geneva-academy.ch Tel: +33 (0)7 81 61 23 97

Research Fellow — Information Technology & Human Rights Law Expert

Adaptable, results-driven human rights professional with comprehensive experience in researching the nexus of fundamental rights with ICT. Excellent skills in building relationships with senior leaders, stakeholders and colleagues. Highly developed expertise in the spheres of public international law, comparative law, EU data protection and privacy law.

Extensive administrative experience in developing research projects. Demonstrated ability to effectively administer and execute administrative functions, including event planning and organising conferences. Comprehensive professional network in the legal and human rights community internationally, with experience in multiple geographic regions (English, French, Russian languages) and working with cross-cultural teams.

Core Competencies:

- Data Protection & Privacy Law Expertise • Project Management – Research Programmes
- Relationship Management • Expertise in IT Networks & Security • Budget Planning & Monitoring
- Excellent Teamworking Capabilities • Experienced Educator & Trainer • IT Consulting Expertise
- Digital Marketing Consulting Experience • Experienced Academic Proofreader & Editor
- French/English Translation Skills

Professional Qualifications:

- Certified Information Privacy Manager (CIPM)
- Certified Information Privacy Professional/Europe (CIPP/E)
- Six Sigma Black Belt Certification • Advanced Microsoft Certification Excel/Word/Outlook

Professional Experience:

Research Fellow: Information Technology & Human Rights Law

September 2018 - Current

Organisation: Geneva Academy, Geneva, Switzerland

Research Fellow at the Geneva Human Rights Platform conducting research on the intersection of information technology with human rights law.

- Co-Editor/Author - UNIGE: 'Human Rights Responsibilities in the Digital Age', Hart Publishing, Oxford.
- Project lead - Coordination and delivery of an Expert Meeting of Special Procedures Mandates evaluating impact assessment methodologies.
- Author: 'Challenges to Locational Privacy: The Transformation of Urban Mobility', MPI Studies on Intellectual Property and Competition Law, Springer Publishing, Berlin
- Advisor to the UN Special Rapporteur Clément Voule, OHCHR Special Procedures
- Swissnex Advisory Board Member – 'Towards an Inclusive Future in AI' programme
- Visiting Lecturer - XIII Urals International Human Rights School, Yekaterinburg, Russia
- Adjunct Researcher - University of Essex, Human Rights & Big Data Project
- Advisor - Facebook, Inc. (Combatting Online Hate Speech/Content Moderation)
- UN Human Rights Council - Project Manager/Panel: 'New & Emerging Digital Technologies'
- UN Human Rights Council - Moderator: 'The Innovation Bridge - A Technological Answer to the Digital Divide'
- UN Human Rights Council - Side Event Panellist: 'Human Rights in the Digital Age'
- UN Human Rights Council - Side Event Panellist: 'Digital Trade in Africa'
- Delegate of the Geneva Academy - 'Right to Encryption' Workshop at the Hebrew University, Jerusalem, Israel
- Adjunct Researcher - Max Planck Institute, Munich - Information Workshop Smart Urban Mobility
- Delegate - Global Security Forum 2019, Doha, Qatar

Project Manager: SURVEILLE FP7 / Doctoral Researcher*September 2011 – February 2018**Organisation: European University Institute, Florence, Italy*

Project Manager of SURVEILLE — a €2M EU Commission co-operative research project engaging 11 institutions.

- Management of a team of 3 full-time administrative staff and 6 part-time research staff at the EUI.
- Responsibility for project liaison with EU Commission, project budget, reporting and public dissemination of research.
- Conducted PhD-level research in EU data protection and privacy EU law, final editor/proofreader for all project publications.
- Manager of event/conference planning and logistics for EU Commission's joint project conference in Brussels.
- Development and maintenance of project website, author and editor of video/photo and social media content.

Consultant: Digital Marketing, Communications and Business Operations *May 2012 – January 2018**Organisations: Ski Club GB, Chamonix All Year, Wipe-Out Ltd, Into the Mountains SpA (UK/France/Switzerland).*

Consultant in SME business development: IT networking, online marketing and public relations to 4 UK/French/Swiss businesses. Digital Marketing Manager at Mountain Tracks (co-brand of Ski Club GB).

Acting Country Director/Senior Legal Advisor*February 2011 – August 2011**Organisation: Danish Refugee Council, Dushanbe, Tajikistan*

Acting Country Manager on a 6-month interim assignment prior to commencing doctoral studies in law.

- Personnel, finance and administrative management of a team of 6 national employees.
- Successfully negotiated a binding Memorandum of Understanding (MOU) with the country's Presidential Administration.
- Instituted dialogue with the government's Interior/Defence & Foreign Ministries.
- Authored successful Microsoft Inc. grant application to fund office IT network development and expansion.
- Designed, implemented and ran the DRC's in country ICT and administrative operations.
- Responsible for managing two €1M projects funded by EU and DANIDA. As Senior Legal Advisor, conducted training of the Tajik judiciary, law enforcement and border officials on the norms and application of international law.

Freelance Editor/Researcher*April 2010 – December 2011**Organisation: Country of Origin Research and Information (CORI), London, UK*

Author of legal research for use in refugee status determination cases in UK immigration tribunals.

- Conducted analysis to guide the provision of objective country of origin research pertaining to, *inter alia*, access to justice, privacy, freedom of assembly/religion/expression in Russia, Cuba, Mexico, Laos, Uzbekistan, Afghanistan and Kyrgyzstan.

Freelance Legal Translator*January 2010 – July 2010**Organisation: Fédération Internationale des ligues des Droits de l'Homme (FIDH), Paris, France*

Provided a French-English translation of FIDH's 'Corporate Accountability for Human Rights Abuses' publication.

Research Assistant*November 2009 – August 2011**Organisation: University of Bristol, UK*

Author of legal research on the monitoring of the newly developed legal mechanisms in the implementation of the UN Convention on the Rights of Persons with Disabilities. Conducted legal research for the Open Society Institute's project on independent monitoring of detention facilities and access to healthcare for detainees in six former Soviet republics.

External Lecturer – Law Faculty*September 2009 – March 2010**Organisation: University of Copenhagen, Denmark*

Lecturer for postgraduate course 'Legal English' for foreign students, focusing on the development of jurisprudence in US and Commonwealth jurisdictions. Assisted the development of the LLM syllabus for improving the teaching of legal English.

Project Assistant – Corporate Social Responsibility*January 2009 – July 2009**Organisation: Human Rights and Business, Institute for Human Rights, Copenhagen, Denmark*

CSR advisor: responsible for researching and writing the team's country risk assessments.

- Authored the due diligence report evaluating risk to DIHR of partnering with NGOs on Cuban human rights violations.
- Prepared guidance for clients including Coca Cola, Maersk, Novo Nordisk, Shell Oil and Danfoss on legal frameworks pertaining to child labour across multiple jurisdictions.

Research Assistant – Law Faculty*May 2008 – January 2009**Organisation: University of Strathclyde, Glasgow, UK*

Part-time assistant to a visually impaired LLB law student, preparing materials for transcription in UK Tax Law, Forensic Science, Local Government Law and EU Law.

Communications Officer*November 2005 – October 2006**Organisation: International Organisation for Migration, Glasgow, UK*

Managed the creation of a new branch office and ran day-to-day operations of IOM in Scotland.

- Oversight of daily caseload management of IOM clients across Scotland and liaison with UK Home Office.
- Management of communications, logistics, budgeting and administrative functions of the office.
- Responsible for the outreach programme, including liaison with the Scottish government and its ministries: developed relationships with key external agencies, partner institutions and welfare services.

Consultant Business Operations Specialist*September 2005 – October 2005**Organisation: American Express Europe Ltd., UK*

Six Sigma (Black Belt) Project Consultant responsible for evaluating and reporting on incumbent business processes and procedures relating to the certification of American Express retail POS terminals in Europe, North America and Asia.

- Author of the final business assessment outlining recommendations for process improvement and expenditure reduction.

Business Operations Specialist*November 2002 – July 2005**Organisation: BuffUSA LLC Sportswear, Berkeley, USA*

Leveraged expertise in business operations to develop a start-up distribution business.

- Developed business case reviews, CBA and business impact assessments for the US market.
- Implementation of electronic data interchange (EDI) services for principal vendors, including REI, Macy's.
- Leader of streamlining and process quality improvement projects to deliver enhanced servicing capability.

Project Manager/Process Management Specialist*September 2000 – October 2002**Organisation: American Express, Brighton, UK*

Completed Amex 12-month graduate programme, then hired into the company's Interactive Development team as a Project Manager in Process Re-engineering. Completed Six Sigma Black Belt training, responsible for training Nordic market's service managers as Green Belts.

- Senior Project Manager for business process modelling and operational process re-design. Responsible for project budget forecasting and business case development for future project implementations.
- Supervisor and mentor to 4 project research analysts in project team of Business Re-engineering.

Education:

2012 -2018	PhD: International Privacy and Data Protection Law, EUI Academy of European Law, Italy
2011 -2012	L.L.M. European Human Rights Law, EUI Academy of European Law, Italy
2008 -2009	Diploma, International Humanitarian Law, ICRC Geneva, Switzerland
2007 -2008	L.L.M. Human Rights Law - (<i>Distinction</i>), University of Strathclyde, UK
- 2008 -	Diploma, International Human Rights Law - (<i>Distinction</i>), EUI Academy of European
Law, Italy	
2006 -2007	M.A. Environment, Policy and Society, Open University, UK
1993 -1999	B.A. (Honours) French and Russian Languages - 2:1, University of Manchester, UK

ANNEX 2 – Appointment of ITFLOWS Partners' Data Protection Officer

- Appointment of Dr. Tiziano Gerardi as DPO of CRI:

ASSOCIAZIONE DELLA CROCE ROSSA ITALIANA
VIA TOSCANA N. 12, C.A.P.: 00187, ROMA (RM)
C.F. e P.IVA: 13669721006

LIBRO DEI PROVVEDIMENTI ADOTTATI DAL PRESIDENTE



Croce Rossa Italiana

PROVVEDIMENTO N. 28 DEL 23 MAGGIO 2018

Oggetto: atto di designazione del Data Protection Officer (DPO) ai sensi dell'art. 37 del Regolamento UE 2016/679

VISTO il Decreto legislativo 28 settembre 2012, n. 178 e ss.mm.ii;

VISTO il Decreto legislativo 3 luglio 2017, n. 117

VISTO il vigente Statuto dell'Associazione della Croce Rossa Italiana, modificato – da ultimo – con atto a ministero notaio Elisabetta Mussolini rep. N. 5259 Racc. n. 3696, registrato a Roma 4 il 27/03/2018, n. 9456, Serie 1T;

VISTO, in particolare, l'art. 34.1 del vigente Statuto che prevede il Presidente Nazionale *"rappresenta la Croce Rossa Italiana sia in Italia che all'estero, di fronte a terzi e in giudizio"* e che *"cura i rapporti con le autorità istituzionale della Repubblica italiana e con gli altri enti ed associazioni esterni a diffusione nazionale"*

VISTO il vigente Regolamento di organizzazione;

TENUTO CONTO della vigente struttura organizzativa dell'Associazione della Croce Rossa Italiana;

PREMESSO CHE il Regolamento (UE) 2016/679 del Parlamento Europeo e del Consiglio del 27 aprile 2016 *"relativo alla protezione delle persone fisiche con riguardo al trattamento dei dati personali, nonché alla libera circolazione di tali dati e che abroga la direttiva 95/46/CE"* (Regolamento generale sulla protezione dei dati) (di seguito RGPD), in vigore dal 24 maggio 2016, e applicabile a partire dal 25 maggio 2018, introduce la figura del Responsabile della protezione dei dati (RPD) (artt. 37-39);

VISTO l'art. 37 del sopra menzionato Regolamento 2016/679;

PREMESSO CHE le predette disposizioni prevedono che il RPD *"può essere un dipendente del titolare del trattamento o del responsabile del trattamento oppure assolvere i suoi compiti in base a un contratto di servizi"* (art. 37, paragrafo 6) e deve essere individuato *"in funzione delle qualità professionali, in particolare della conoscenza specialistica della normativa e delle prassi in materia di protezione dei dati, e della capacità di assolvere i compiti di cui all'articolo 39"* (art. 37, paragrafo 5) e *"il livello necessario di conoscenza specialistica dovrebbe essere determinato in base ai trattamenti di dati effettuati e alla protezione richiesta per i dati personali trattati dal titolare del trattamento o dal responsabile del trattamento"* (considerando n. 97 del RGPD);

CONSIDERATO CHE, in ragione del profilo dimensionale dell'Associazione, del numero elevato dei settori di attività, del numero



[Handwritten signature]

Il Presidente Nazionale

ASSOCIAZIONE DELLA CROCE ROSSA ITALIANA
VIA TOSCANA N. 12, C.A.P.: 00187, ROMA (RM)
C.F. e P.IVA: 13669721006

LIBRO DEI PROVVEDIMENTI ADOTTATI DAL PRESIDENTE



Croce Rossa Italiana

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elevato delle sedi dislocate sul territorio italiano, del numero elevato del personale dipendente, risulta necessario provvedere alla nomina di un DPO;

PRESO ATTO dell'istruttoria interna demandata al Segretario Generale, svoltasi anche avvalendosi del supporto tecnico di società esterna specializzata in materia, acquisita agli atti con prot. interno n. 000920 del 07 maggio 2018;

CONSIDERATO CHE all'esito della predetta istruttoria è stato ritenuto che il dipendente Tiziano Gerardi sia in possesso del livello di conoscenza specialistica e delle competenze richieste dall'art. 37, par. 5, del RGPD, per la nomina a RPD, e non si trova in situazioni di conflitto di interesse con la posizione da ricoprire e i compiti e le funzioni da espletare;

PRESO ATTO della disponibilità manifestata dal dipendente sopraccitato a ricoprire in ruolo, come da nota prot. in atti n. 16602/E del 04 maggio 2018; Ravvisata la necessità, ai fini del presente atto, di dover temere conto degli orientamenti, chiarimenti, modelli e linee-guida emanati dal Garante per la protezione dei dati personali

DETERMINA

per le motivazioni espresse in premessa,

- 1) Di designare, con decorrenza immediata, il Dr. Tiziano Gerardi, nato a Roma il 24/01/1977, CF. GRRTZN77A24H501V quale *Data Protection Officer* (DPO) per l'Associazione della Croce Rossa Italiana (C.F. e P.IVA 13669721006)
- 2) Che il predetto, nel rispetto di quanto previsto dall'art. 39, par. 1, del RGPD è incaricato di svolgere, in piena autonomia e indipendenza, i seguenti compiti e funzioni:
 - a. informare e fornire consulenza al titolare del trattamento o al responsabile del trattamento nonché ai dipendenti che eseguono il trattamento in merito agli obblighi derivanti dal RGPD, nonché da altre disposizioni nazionali o dell'Unione relative alla protezione dei dati;
 - b. sorvegliare l'osservanza del RGPD, di altre disposizioni nazionali o dell'Unione relative alla protezione dei dati nonché delle politiche del titolare del trattamento o del responsabile del trattamento in materia di protezione dei dati personali, compresi l'attribuzione delle responsabilità, la sensibilizzazione e la formazione del personale che partecipa ai trattamenti e alle connesse attività di controllo;



Il Presidente Nazionale

ASSOCIAZIONE DELLA CROCE ROSSA ITALIANA
VIA TOSCANA N. 12, C.A.P.: 00187, ROMA (RM)
C.F. e P.IVA: 13669721006

LIBRO DEI PROVVEDIMENTI ADOTTATI DAL PRESIDENTE



Croce Rossa Italiana



- c. fornire, se richiesto, un parere in merito alla valutazione d'impatto sulla protezione dei dati e sorvegliarne lo svolgimento ai sensi dell'articolo 35 del RGPD;
 - d. cooperare con il Garante per la protezione dei dati personali;
 - e. fungere da punto di contatto con il Garante per la protezione dei dati personali per questioni connesse al trattamento, tra cui la consultazione preventiva di cui all'articolo 36, ed effettuare, se del caso, consultazioni relativamente a qualunque altra questione;
 - f. tenere il registro delle attività di trattamento sotto la responsabilità del titolare o del responsabile;
- 3) di dare atto che i compiti del DPO attengono all'insieme dei trattamenti di dati effettuati dall'Associazione della Croce Rossa Italiana (C.F. e P.IVA 13669721006);
 - 4) di dare atto che l'Associazione della Croce Rossa Italiana si impegna a:
 - mettere a disposizione del DPO le risorse necessarie – finanziarie, di infrastrutture e, ove opportuno, di personale – per l'adempimento delle proprie funzioni (art. 38, par. 2, GDPR)
 - non rimuovere o penalizzare il DPO in ragione dell'adempimento dei compiti affidati nell'esercizio delle sue funzioni;
 - garantire che il DPO eserciti le proprie funzioni in autonomia e indipendenza e in particolare, non assegnando allo stesso attività o compiti che risultino in contrasto o conflitto di interesse;
 - 5) di dare atto che, ai sensi del GDPR, il Dr. Tiziano Gerardi esercita le funzioni di DPO in piena libertà, autonomia e indipendenza professionale rispetto agli organi di governo e alle altre strutture organizzative dell'Associazione – anche a livello gerarchico e funzionale, e a prescindere dall'attuale area di inquadramento;
 - 6) di dare atto, conseguentemente, che verranno disposte le necessarie misure di adeguamento della vigente Struttura Organizzativa;
 - 7) di dare atto che l'eventuale svolgimento di ulteriori compiti e funzioni (in assenza di conflitti di interessi) da parte del dipendente non dovrà sottrarre il tempo necessario allo svolgimento delle attività di DPO, così come indicato dal Garante per la protezione dei dati personali;

Il Presidente Nazionale

ASSOCIAZIONE DELLA CROCE ROSSA ITALIANA
VIA TOSCANA N. 12, C.A.P.: 00187, ROMA (RM)
C.F. e P.IVA: 13869721006

LIBRO DEI PROVVEDIMENTI ADOTTATI DAL PRESIDENTE




- 8) di dare atto che il nominativo e i dati di contatto del DPO saranno resi disponibili sul sito istituzionale dell'Associazione;
- 9) di dare atto che della presente nomina verrà data comunicazione al Garante per la protezione dei dati personali, secondo le modalità previste dal quadro normativo e procedurale vigente;
- 10) di incaricare il Segretario Generale di porre in essere ogni adempimento connesso e consequenziale all'attuazione del presente atto (ivi compresi i punti 7 e 8), anche in relazione al vigente rapporto di lavoro con il dipendente sopraccitato;
- 11) di notificare il presente atto al Dr. Tiziano Gerardi;
- 12) di trasmettere il presente atto al Consiglio Direttivo Nazionale;
- 13) di trasmettere il presente atto al Segretario Generale per i seguiti di competenza.

Roma, 23 maggio 2018

Il Presidente Nazionale
Avv. Francesco Rocca

- Appointment of BUFETE ESCURA S.L.P (Contact person: David Terns) as DPO of OCC:


Registro General de Protección de Datos

OPEN CULTURAL CENTER
 CARRER DEL REC, NUM 27
 08003 - BARCELONA
 BARCELONA

Tipo de operación: Alta


En relación con la comunicación recibida en esta Agencia con registro de entrada 000007128e2100005499 se ha procedido a incluir en la lista prevista en el artículo 34.4 de la Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantías de los derechos digitales la información correspondiente al Delegado de Protección de Datos BUFETE ESCURA, S.L.P. - B61534004 (Persona de contacto: DAVID TERNs) de su entidad.

C/ Jorge Juan, 6
 28001 - Madrid

T + 34 901 100 099

www.aepd.es

FIRMAO ELECTRÓNICAMENTE por: Agencia Española de Protección de Datos. Fecha: 15/02/2021 19:49:28.
 CSV: APOREBDF/CBA/EFED967DC2639663.
 El documento consta de un total de 1 páginas. Página 1 de 1.



ANNEX 3 – Data protection policies of ITFLOWS Partners

A copy of the data protection policies of ITFLOWS Partners involved in conducting the interviews with migrants, refugees and asylum has been forwarded jointly with this document.

ANNEX 4 – Approval letters signed by the IEB and the DPA

- Approval letters signed by the members of ITFLOWS IEB:



Tuesday, 23rd February 2021

TO WHOM IT MAY CONCERN

Dear Sir/Madam

EUROPEAN UNION ITFLOWS PROJECT

In my capacity as Chairwoman of the ITFLOWS Independent Ethics Board, I hereby declare that I have read, and I approve and support the outcomes of the deliverables foreseen for M6 within WP10 (Ethics requirements) – D.10.1 (H-Requirement No.1), D.10.2 (H-Requirement No.2) and D.10.3 (POPD-Requirement No.3).

This approval has been granted following the ethical and legal framework identified as applicable to the ITFLOWS project. The Independent Ethics Board has closely monitored the measures implemented to address the ethical requirements imposed by the European Commission as a result of the Ethics Check to which the project was subject before the signature of the Grant Agreement.

In witness whereof and for all pertinent purposes, this approval is issued.

Yours sincerely,

A handwritten signature in blue ink, appearing to be "L. Mitrou", written over a light blue grid background.

Lilian Mitrou
Professor at Department of Information and Communication System Engineering
University of the Aegean, Greece



Tuesday, 23rd February 2021

TO WHOM IT MAY CONCERN

Dear Sir/Madam

EUROPEAN UNION ITFLOWS PROJECT

In my capacity as Member of the ITFLOWS Independent Ethics Board, I hereby declare that I have read, and I approve and support the outcomes of the deliverables foreseen for M6 within WP10 (Ethics requirements) – D.10.1 (H-Requirement No.1), D.10.2 (H-Requirement No.2) and D.10.3 (POPD-Requirement No.3).

This approval has been granted following the ethical and legal framework identified as applicable to the ITFLOWS project. The Independent Ethics Board has closely monitored the measures implemented to address the ethical requirements imposed by the European Commission as a result of the Ethics Check to which the project was subject before the signature of the Grant Agreement.

In witness whereof and for all pertinent purposes, this approval is issued.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Ruth Fee'.

Ruth Fee
Professor of Public Services Education
Ulster University, United Kingdom



Tuesday, 23rd February 2021

TO WHOM IT MAY CONCERN

Dear Sir/Madam

EUROPEAN UNION ITFLOWS PROJECT

In my capacity as Member of the ITFLOWS Independent Ethics Board, I hereby declare that I have read, and I approve and support the outcomes of the deliverables foreseen for M6 within WP10 (Ethics requirements) – D.10.1 (H-Requirement No.1), D.10.2 (H-Requirement No.2) and D.10.3 (POPD-Requirement No.3).

This approval has been granted following the ethical and legal framework identified as applicable to the ITFLOWS project. The Independent Ethics Board has closely monitored the measures implemented to address the ethical requirements imposed by the European Commission as a result of the Ethics Check to which the project was subject before the signature of the Grant Agreement.

In witness whereof and for all pertinent purposes, this approval is issued.

Yours sincerely,

Marta
Poblet
Balcell

Digitally signed
by Marta Poblet
Balcell
Date: 2021.02.24
07:23:32 +11'00'

Marta Poblet
Associate Professor and Research Director
RMIT University, Australia

- Approval letters signed by the ITFLOWS DPA:



Wednesday, 24th February 2021

TO WHOM IT MAY CONCERN

Dear Sir/Madam,

EUROPEAN UNION ITFLOWS PROJECT

In my capacity as ITFLOWS Data Protection Advisor, I hereby declare that I have read, and I approve and support the outcomes of the deliverables foreseen for M6 within WP10 (Ethics requirements) – D.10.1 (H-Requirement No.1), D.10.2 (H-Requirement No.2) and D.10.3 (POPD-Requirement No.3).

This approval has been granted following the ethical and legal framework identified as applicable to the ITFLOWS project. The Data Protection Advisor has closely monitored the measures implemented to address the ethical requirements imposed by the European Commission as a result of the Ethics Check to which the project was subject before the signature of the Grant Agreement.

In witness whereof and for all pertinent purposes, this approval is issued.

Yours sincerely,

A handwritten signature in blue ink, appearing to read "Jonathan Andrew".

Jonathan Andrew
Associate Research Fellow
Geneva Academy, Switzerland