

D2.3 PD - Requirement No. 2

Deliverable ID:	D2.3
Project acronym:	TRUSTY
Grant:	101114838
Call:	HORIZON-SESAR-2022-DES-ER-01
Topic:	HORIZON-SESAR-2022-DES-ER-01-WA1-7
Consortium coordinator:	MDU
Edition date:	25 July 2024
Edition:	00.01.00
Status:	Official
Classification:	PU

Abstract

TRUSTY project hereby acknowledges that ethics is given the highest priority in EU funded research and that activities carried out under Horizon EUROPE must comply with ethical principles and relevant national, EU and international legislation, such as the Charter of Fundamental Rights of the European union and the European Convention on Human Rights. TRUSTY project hereby also acknowledges that pursuant to the Grant Agreement the beneficiaries must carry out the action in compliance with:

- Ethical principles (including the highest standards of research integrity as set out, for instance, in the European Code of Conduct for Research Integrity and including avoiding fabrication, falsification, plagiarism or another research misconduct),
- Applicable international, EU and national Law.

TRUSTY plans to organize interviews, workshop events and validation activities. form.

Authoring & approval

Author(s) of the document

Organisation name	Date
UNIROMA1	2024-04-01
ENAC	2024-02-22

Reviewed by

Organisation name	Date
Deep Blue	2024-04-10
ENAC	2024-04-16
MDU	2024-04-18

Approved for submission to the SESAR 3 JU by¹

Organisation name	Date
MDU	2024-04-15
ENAC	2024-04-12
UNIROMA1	2024-04-12
Deep Blue	2024-04-10

Rejected by²

¹ Representatives of all the beneficiaries involved in the project

² Representatives of the beneficiaries involved in the project

Organisation name	Date

Document history

Edition	Date	Status	Company Author	Justification
00.00.01	23/03/24	Initial template	UNIROMA1	Initial table of contents and structure of the report
00.00.02	05/04/24	Initial Draft	UNIROMA1	Review
00.00.03	19/04/24	Draft	UNIROMA1	Update with review comments
00.00.04	22/04/24	Draft	MDU	Final review
00.00.05	25/04/24	Final	MDU	Ready for submission
00.01.00	25/07/24	Official	MDU	Final Official version

Copyright statement © (2024) – (TRUSTY Consortium). All rights reserved. Licensed to SESAR 3 Joint Undertaking under conditions.

TRUSTY

TRUSTWORTHY INTELLIGENT SYSTEM FOR REMOTE DIGITAL TOWER

TRUSTY

This document is part of a project that has received funding from the SESAR 3 Joint Undertaking under grant agreement No 101114838 under European Union's Horizon Europe research and innovation programme.



Table of contents

1	<i>Introduction.....</i>	6
2	<i>Data Protection Policy.....</i>	7

1 Introduction

TRUSTY project harnesses the power of artificial intelligence (AI) to enhance resilience, capacity, and efficiency in making significant advancements in the deployment of remote digital towers (RDT). The overall goal of TRUSTY is to provide adaptation in the level of transparency and explanation to enhance the trustworthiness of AI-powered decisions in the context of RDT.

This document describes the compliance of project TRUSTY with the ethics requirements PD – Requirement No.2 (Processing of Personal Data). In particular, the following points will be addressed:

- ENAC Data Protection Officer
- Data minimization principle
- Data storage and protection

1.1 Applicable Reference material

Unless otherwise stated, the execution of the project **will be fully compliant** with the latest version of the SESAR 3 Project Handbook available in STELLAR Program Library³.

³ TRUSTY Grant Agreement Description of Action - GA- 101114838-TRUSTY

2 Data Protection Policy

PD – Requirement No.2 (Processing of Personal Data) is involved in any operation (or set of operations) performed on personal data either manually or automatically, from collection, storage, usage to destruction.

TRUSTY project foresees several activities and resources which could potentially require the processing of personal data:

- Website
- Workshop with operational decision makers and other identified stakeholders,
- Interviews of operational decision makers and other identified stakeholders,
- Validation activities involving end users and other identified stakeholders.

2.1 Identification of the Controller

ENAC as the TRUSTY project scientific committee and containing the facilities for some foreseen validation activities will act as the controller of all the personal data collected by the project. The Controller is responsible for ensuring GDPR compliance and controls the procedures and purpose of data usage in collaboration with the partners' Data Protection Officer.

2.2 Data Protection Officer

TRUSTY partners have designated a Data Protection Officer (DPO) to comply with all the data protection requirements in accordance with all the applicable data protection regulations. Each partner can manage the data it has collected, with the agreement and under the supervision of the Controller. However, ENAC can also provide an access protected storage space on its own server for data safeguard (see **Errore. L'origine riferimento non è stata trovata.**).

Contact information for the DPO of each partner are the following:

- ENAC: Laurence Porte, laurence.porte@enac.fr
- Deep Blue: Elizabeth Humm, elizabeth.humm@dblue.it

This contact information will be provided prominently in any activity or resource that involves personal data processing, depending on the data collection responsible. Please note that MDH and UNISAP will also process data, completely anonymized, so they will not have any access to any link between data and identity of experimental participants. They will act as data processors.

2.3 Relevance of collected data

The purpose for the processing of each category of personal data will be specifically indicated further on for every TRUSTY activity, specially focusing on communication and dissemination activities. The TRUSTY Consortium will process Personal data on a lawful basis, as provided in Articles 6 and 9 of the GDPR.

WEBSITE

TRUSTY website and social media will sustain communication activities allowing TRUSTY to target a larger audience. On TRUSTY website it will be created a dedicated section with cookie policy to inform users about how their data will be used. Any data required by the website serves the correct functioning of the service. Users' data will never be sold or exchanged with anyone external to the project consortium. The project will collect only data to monitor and analyse web traffic, and to keep track of user behaviours. Using only aggregated data will guarantee user anonymity. Further, once TRUSTY will end all the sensible data will be deleted.

INTERVIEWS

Participants to interviews are either invited personally or voluntarily registered. The following personal data are needed and recorded by TRUSTY consortium: First name and Last name, Organisation, Email address. Interviews will be organized by all the TRUSTY partners.

During the interviews, participants might provide personal opinions, experiences, comments, on safety research released topics. No 'sensitive data' (data relating to religion, politics, health, sexual orientation, etc.) will be collected through the project, and therefore no policy is considered for those.

Only aggregated results will be recorded and shared by TRUSTY Partners. Depending on the interviews, results may be shared with the participants, with the TRUSTY consortium, with the SJU Project Officer, or made publicly available via the TRUSTY website.

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

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

(Virtual) WORKSHOP

Participants to workshops are either invited personally or voluntarily registered. The following personal data are needed and recorded by TRUSTY Partners: First name and Last name, Organisation, Email address. Workshops will be organized by all the TRUSTY partners.

More information for personal identification could be required to access the premises of the workshop, as the workshop may be hosted by international organizations or private companies.

The personal data will be collected and communicated to the host organization / company but not stored by TRUSTY Partners: First name, Last name, Nationality. Information about food allergies could be necessary for those workshop that include meals.

During workshop activities, participants may work in work sessions and provide personal opinions, experiences, comments, on safety research released topics. No 'sensitive data' (data relating to religion, politics, health, sexual orientation, etc.) will be collected through the project, and therefore no policy is considered for those.

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

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

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

VALIDATION ACTIVITIES

Participants of validation activities are either selected due to the contribution they can offer to TRUSTY research. The following personal data are needed and recorded by TRUSTY Partners: First name and Last name, Organisation, Email address. All TRUSTY partners will participate to the validation of the project findings. During the validation and all the related to activities, the Consortium will act in compliance with the GDPR. Any data recorded during the validation activities will be anonymised before being processed. No 'sensitive data' (data relating to religion, politics, health, sexual orientation, etc.) will be collected through the project, and therefore no policy is considered for those.

2.4 Measures to safeguard personal data

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

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

SECURITY MEASURES

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

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

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

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

DATA STORAGE

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

Latest encryption techniques will be applied to all digital data.

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

ENAC provides different storage spaces, with a protected access, depending on the need:

- Redmine: ENAC hosts a private instance of a Redmine server⁴ (<https://git.recherche.enac.fr>) which provides a wiki and a document storage space for general project related information.
- Git: ENAC's Redmine instance is coupled with a Git server⁵ for configuration management
- Private cloud: if a larger space is needed for collected data, ENAC can also provide storage on its own instance of NextCloud⁶.

DATA RETENTION

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

The aggregated data will be publicly available and can be freely used after the project, and it will be listed in the Final Project Results Report.

DATA DESTRUCTION

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

DATA BREACHES

In the case of a personal data breach, the controller will without undue delay and, where feasible, not later than 72 hours after having become aware of it, notify the personal data breach to the supervisory authority competent in accordance with GDPR rules, unless the personal data breach is unlikely to

⁴ <https://www.redmine.org/>

⁵ <https://git-scm.com/>

⁶ <https://nextcloud.com/>

result in a risk to the rights and freedoms of natural persons. Where the notification to the supervisory authority is not made within 72 hours, it shall be accompanied by reasons for the delay.

The controller prepared an internal policy to manage the event of a data breach in accordance with the GDPR. Every person affiliated to one of the TRUSTY partners must report a suspected data breach to the following email address without undue delay Christophe.Hurter@enac.fr.

2.5 Informed consent procedures

The processing of Personal data will be based on **Consent** (for common Personal data) and **Explicit Consent** (for special categories of Personal data).

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

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

As requested in Article 7 of the GDPR, the TRUSTY Consortium will be able to demonstrate that all data subjects have consented to processing of their Personal data. Explicit consent will be obtained before processing special categories of personal data, such as food allergies and personal opinions.

Consent of the data subject means any:

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

The TRUSTY Consortium will ensure the so called “granularity” of consent: “A service may involve multiple processing operations for more than one purpose. In such cases, the data subjects should be free to choose which purpose they accept, rather than having to consent to a bundle of processing purposes”.

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

In all TRUSTY activities no Personal data will be processed without Informed, specific, explicit consent of the data subjects. The main user groups targeted are professionals working in the aviation domain (e.g., airspace users, air navigation service providers, airport operators, staff associations and their members, manufacturing associations and their members, institutional decision-makers, media,

researchers, etc.). Engaged stakeholders will have the competence to understand written and oral informed consent information.

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