*Driv*ing Innovation in Crisis Management for *E*uropean *R*esilience

D130.22 – Ethical Approval 2

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Collection of the second round of Ethical Approvals for all relevant DRIVER activities between M6-M18.

Document Information

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2.0	2017-02-01	ATOS	Final version submitted

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List of Acronyms

Abbreviation / acronym	Description
D	Deliverable
DoW	Description of Work
DPA	Data Protection Authority
M	Month
SP	Subproject
SC15	Special Clause 15
T	Task
WP	Work package

Project Description

DRIVER evaluates emerging solutions in three key areas: civil society resilience, responder coordination as well as training and learning.

These solutions are evaluated using the DRIVER test-bed. Besides cost-effectiveness, DRIVER also considers societal impact and related regulatory frameworks and procedures. Evaluation results will be summarised in a roadmap for innovation in crisis management and societal resilience.

Finally, looking forward beyond the lifetime of the project, the benefits of DRIVER will materialize in enhanced crisis management practices, efficiency and through the DRIVER-promoted connection of existing networks.

DRIVER Step #1: Evaluation Framework

- Developing test-bed infrastructure and methodology to test and evaluate novel solutions, during the project and beyond. It provides guidelines on how to plan and perform experiments, as well as a framework for evaluation.
- Analysing regulatory frameworks and procedures relevant for the implementation of DRIVER-tested solutions including standardisation.
- Developing methodology for fostering societal values and avoiding negative side-effects to society as a whole from crisis management and societal resilience solutions.

DRIVER Step #2: Compiling and evaluating solutions

- Strengthening crisis communication and facilitating community engagement and self-organisation.
- Evaluating emerging solutions for professional responders with a focus on improving the coordination of the response effort.
- Benefiting professionals across borders by sharing learning solutions, lessons learnt and competencies.

DRIVER Step #3: Large scale experiments and demonstration

- Execution of large-scale experiments to integrate and evaluate crisis management solutions.
- Demonstrating improvements in enhanced crisis management practices and resilience through the DRIVER experiments.

DRIVER is a 54 month duration project co-funded by the European Commission Seventh Framework Programme (FP7/2007-2013) under grant agreement no. 607798.

Executive Summary

The purpose of this administrative document is to collect the second round of ethical approvals required for all the activities in the project, in need of such approvals. While D95.22 Ethical Approval 1, collected all the approvals necessary between M1-M6, this document, D95.23 Ethical Approval 2, collects all the approvals necessary between M6-M18. Thus, this deliverable updates the table of approvals set out in D95.22 with the new tasks and the new approvals for the current reporting period.

This deliverable is closely linked to two other research ethics deliverables:

1. D95.21 *Planning for Ethical Approvals*
    a. This deliverable **presents the monitoring plan** for how PRIO will manage and oversee the process of ensuring that the relevant ethical approvals are obtained for every activity in DRIVER needing it. This plan is then put into action in the series of deliverables called *Ethical Approval 1, 2, etc*. The current deliverable is thus the second round of this collection of approvals, using the plan set out in D95.21.
2. D95.22 *Ethical Approval 1*
    a. This deliverable **collects and delivers the first round of ethical approvals**, following the plan and strategy in D95.21, as described above. The structure of this deliverable was chosen to reflect the very clear description of the deliverable in the DoW: "This deliverable will contain the copies of the approvals/ notifications obtained [for the relevant period]".

Thus, the current deliverable follows the same general structure of the first deliverable/ round of collected approvals, since the description and expectation of the deliverable in the DoW is exactly the same. Concretely, the most important approvals needed for the DRIVER tasks are data protection approvals that are issued by the local data protection agencies of those partners who lead the respective task. These constitute most, if not all approvals within DRIVER. Many DRIVER tasks are ongoing, and some pending research activities will need approval at a later stage in the project,. The status of the tasks starting up until M18 is indicated in table 1, and relevant communication and documentation is attached in annex. All received documents and mails are archived at PRIO and retrievable on request by the Project Coordinator, the Ethical and Societal Advisory Board or the European Commission Project Officer. A calendar indicates the tasks which are expected to require an approval by the next version of this deliverable, D95.21 *Ethical Approval 3*. This calendar will be updated after the suspension period (M27).

1 Introduction

1.1 Purpose and structure of the deliverable

The purpose of this administrative document is to collect the second round of ethical approvals required for all the activities in the project, in need of such approvals. While D95.22 *Ethical Approval 1*, collected all the approvals necessary between M1-M6, this document, D95.23 *Ethical Approval 2*, collects all the approvals necessary between M6-M18 (October 2014- October 2015). Thus, this deliverable updates the table of approvals set out in D95.22 with the new tasks and the new approvals for the current reporting period. The deliverable follows the same general structure as *Ethical Approval 1*, and the structure was chosen to reflect the very clear description of the deliverable in the DoW: "This deliverable will contain the copies of the approvals/ notifications obtained [for the relevant period]". Having the consecutive deliverables in this task following the same structure, eases the readability of them, as well as it allows PRIO to focus its efforts on the most time consuming part of this task- consultations and bilateral follow-up with partners who have questions or concerns about the process of obtaining approvals. It is clear to PRIO that the various levels of experience with research ethics, and concretely with ethics approvals, among the partners, makes it important that PRIO is able to follow up with the partners that need special assistance or that are faced with more complex challenges or situations. The abovementioned approach to carrying out the ethical monitoring of the project accommodates for this need, and is based on lessons learnt and experiences from other projects that PRIO has been engaged with.

The overall task of managing relevant ethics approvals (and research ethics in general), is led by PRIO. PRIO, having extensive experience from carrying out similar tasks in other EU FP7 projects, designed the approach to research ethics in DRIVER to be effective, constructive and efficient. Experience and lessons learnt from doing similar tasks (also on data protection and privacy in a more conceptual sense) in projects such as LASIE [1] (Large Scale Information Exploitation of forensic data), PERSEUS [2] (Protection of European Borders and Seas through the Intelligent Use of Surveillance), SOURCE [3] (Virtual Centre of Excellence for Research Support and Coordination on Societal Security), and PACT [4] (Public perception of security and privacy: Assessing knowledge, Collecting evidence, Translating research into action), are part of the basis for how this task is carried out in DRIVER.

In addition to fulfilling its core task of collecting and forwarding the second round of approvals, the deliverable also reminds the DRIVER consortium about the approval procedures. It does so by updating the calendar set out in D95.22, and by providing basic instructions for how to go about and obtain the relevant approvals[1]. In sum, the purpose of the deliverable is to collect the approvals due between M6- M18.

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[1] However, the complete guidelines for research ethics in DRIVER can be found in D91.3 *Ethical Guidelines, Risk and Safeguards*, and the complete and detailed plan for concretely how to decide if approval is needed, and which steps to take to obtain/ apply for approval can be found in D95.21 *Planning for Ethical Approval*.

The activities flagged in D95.22 as being in need of approval, are collected in this deliverable, and thus fall under five different status categories (see also chapter 3.1):

1) **Registration completed**
   a. This means that the process is completed, and that formal approval was not required by the relevant authories, but a notification/ registration with the DPA.

2) **Approval received**
   a. This means that the relevant approval has been received from the partner by PRIO, and this is documented in the annex to this deliverable.

3) **No data is being collected/ no approval needed**
   a. This means that although flagged as might being in need of approval, this did not prove necessary after further scrutiny (e.g. because personal data was not collected after all).

4) **Application in process**
   a. This means that the relevant approval/ notification process was still underway at the point of delivery of this deliverable. However, the documentation to demonstrate the ongoing process is in annex.

5) **Activity postponed**
   a. This means that the activity at stake has been postponed, either so that it falls under the scope of the next reporting period (and would be part of Ethical Approval 3), or indefinitely.

These five categories of different statuses for the approvals due between M6- M18, are collected in a table in chapter 3 of this deliverable. See Table 2. Here, tasks in categories 1, 2 and 4 are explained, and relevant documentation is provided in the annexes of this deliverable. For tasks in category 5, these are indicated in the same table as well. In Table 3, email exchanges, which document that particular tasks, i.e. in category 3, are not in need of ethical approvals, are explained.

Partners should also be reminded that in especially complicated cases, the national Data Protection Authorities should be consulted for advice. PRIO can also be consulted in special cases, preferably for more procedural inquiries.

1.2   The iterative nature of the Ethical Approval deliverables

The reason for having iterations of the Ethical Approval- deliverables is not to improve the very concept of collecting approvals, but to physically coordinate and carry out the second round of following up with partners individually, collecting the approvals and forwarding them via the deliverable to REA. Planning for Ethical Approvals, and not only the writing of the deliverable. As the process of informing partners about the procedure, the bilateral following-up of partners, and the actual organizing and collecting of the approvals/ notifications proved to be effective and efficient in *Ethical Approval 1*, the same procedure was followed for *Ethical Approval 2*. If PRIO later encounters

difficulties or challenges that are experienced to be hampering the process, PRIO will consider and implement the necessary changes and adjustments to the procedure, but as long as the planning for the collection of approvals, as presented in D95.21 *Planning for Ethical Approvals*, is smooth, there is no reason to change the nature of this task. Furtermore, it is via the annual Ethical Monitoring Reports that emerging challenges or peculiarities relating to research ethics will be detailed and addressed.

1.2.1 Progress from Ethical Approval round 1

To the degree that this second round of collecting approvals has differentiated from the first round, a few changes should be mentioned.

- **Progress 1: Two additional columns have been added to the approval overview table.**
  - The five statuses of the approvals that are documented in this report, are now: 1) Registration completed, 2) Approval received, 3) No data is being collected/ no approval needed: 4) Application in process, and 5) Activity postponed.
- **Progress 2: The scope of potential approvals needed has been narrowed down.**
  - It is clear that no testing on human or animal cells will take place in DRIVER, hence no medical approvals will be needed.
- **Progress 3: Intensified information flow from PRIO to the DRIVER consortium.**
  - A workshop by PRIO about research ethics was held at the General Assembly meeting in Ispra in February 2015. In addition, PRIO has continued to follow up bilaterally when necessary, to explain procedures and issue reminders (as per the table provided in this deliverable). On the 28th April 2015, the project coordinator sent out an email to the full DRIVER consortium, to once more iterate the importance of ethical approvals. A letter with detailed instructions prepared by PRIO as well as deliverables with additional information were attached to the email.
- **Progress 4: Increased knowledge about data protection & privacy issues.**
  - The first effort by PRIO to inform the DRIVER consortium about standard procedures and rules for research ethics, was extensive and required significant follow-up, e.g. via presentations for the General Assembly in Ispra in 2015, and bilateral consultations with individual partners with specific issues. The overall level of knowledge seems to have improved among the consortium partners. It became clear as a result of the questionnaires that partly formed the basis for the first Ethical Monitoring report, that for many of the partners, the issue of research ethics was actually a new one, hence a lot of follow- up was needed. Now, the partners seem to be more on the same level of understanding when it comes to these issues, thus the information procedures and the follow-up by PRIO can be performed in a more coherent manner. Consequencely, the current deliverable did not change its general structure or nature from Ethical Approval.

2 The DRIVER Ethical Approval Information Procedure

2.1 Kinds of approvals needed in DRIVER

Research conducted within DRIVER is expected to maintain high ethical standards. These standards are described, discussed and implemented, in D95.22 *Ethical Approval 1*, in D91.3 *Ethical procedures, Risks and Safeguards*, D95.21 *Planning for Ethical Approvals*, and D95.31 *Ethical Monitoring Report 1*. Obligations set out by the European Commission are furthermore embedded in the Grant Agreement of the DRIVER project in a variety of ways, most prominently through the general contractual mechanism put in place in order to assure this high standard of research ethics, known as Special Clause 15 (SC15).

As SC15 and the discussions and information given in D95.22 and D95.31 show, research conducted in the DRIVER project can be subject to two kinds of approvals:

1) general data protection approvals
2) other ethical approvals relating to activities taking place in "the field"[2].

It is still likely that the upcoming trials in DRIVER might include elements of play acting, which may include professional volunteers or citizens. In that case, it is of crucial importance that the DRIVER partners take measures to ensure that no harm is being done to participants and bystanders. Detailed instructions for how to relate to this is given in chapter 3.1. of D91.3. For example, if a field exercise in public with volunteers (e.g. vulnerable groups) is taking place, information regarding de-briefing and follow-up for the volunteers are strongly encouraged.

If these elements will be included, approvals might have to be sought from the relevant national ethics committee of the responsible partner. Often, data protection authorities (DPAs) and other ethical committees are gathered in one authority and may issue both kinds of approvals, but this will have to be investigated in the individual cases. Some institutions have their own ethical advisory boards, such as large companies, universities, labs etc., which do have authority to issue such approvals.

Although this might be relevant at a later stage in the project, **all tasks mentioned in this deliverable are in need of approvals by data protection authorities only.**

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[2] In the sense that they would take place in public, and e.g. potentially have an impact on bystanders or the general public.

2.2 Informing the consortium about approval procedures

This section describes how PRIO has engaged with the DRIVER consortium, to ensure that every partner was made aware of the (potential) need for ethical approval in the reporting period. The information process about the potential necessity to obtain approvals included several stages, and has been further developed since the submission of D95.22:

1. The DoW already flags very broadly the tasks that may be in need of approval. In addition to that, in the beginning of the project, PRIO went through the complete DoW to check whether other tasks may also need approval. See Table 1. These were flagged, for example, in D95.22 and in an approval calendar. Here, it is clearly set out that task leaders are responsible to define whether their activities do involve personal data and that task leaders, in general, are responsible to obtain the respective approvals.
2. The necessity of approvals was also reiterated during a workshop by PRIO at the General Assembly meeting in Ispra in February 2015. In addition to that, the issue was brought up at several PMC Telephone conferences.
3. PRIO has continued to follow up with individual SP leaders and task leaders when necessary, to explain procedures and remind the respective responsible partners of their approval process.
4. To further strengthen the effort on research ethics, on the 28th April 2015, the project coordinator sent out an email to the full DRIVER consortium, to remind them about the importance and responsibility of ethical approvals. A letter with detailed instructions prepared by PRIO as well as deliverables with additional information were attached to the email.
5. The first Ethical Monitoring Report, D95.31, also documented and addressed key ethical issues in DRIVER, and repeated and refined some core points from previous deliverables; both to clarify some particularly important points regarding research ethics, but also to update and specify previously given guidelines.
6. Finally, pertaining to this deliverable, reminders (e.g. on September 2nd 2015) have been sent to every partner listed in the table of indicated tasks where approvals were needed (table 1). In addition, individual reminders have been sent to those partners that did not respect the internal deadlines set by PRIO.

2.3 Is data protection approval needed?

The table below is developed to be a practical tool for partners to decide if data protection approval is needed for the activity at stake. While it does not serve as a guarantee for such cases, it nonetheless provides for a vantage point for further follow-up or discussions with either PRIO, the relavant data protection authority or potentially other ethics commitees.

Is personal data being collected?[3]		
WHAT DO YOU DO?	**IF YES**	**IF NO**
Do you collect directly identifiable personal data[4]?	Data Protection Approval needed.	Data Protection Approval might be needed (see next question).
Do you collect indirectly identifying personal data (such as background material that might identify individuals)[5]?	Data Protection Approval needed.	Data Protection Approval not needed (if "no" on previous question as well).
Will personal data be collected via online forms (direct/ indirect/ via IP-address or email address)?	Data Protection Approval needed. Note that even if only the data processor has access to the identifiable information (such as an IP-log), approval is needed.	For the collection of data through online forms to be regarded as anonymous, neither IP-address, browser information, nor information capsules etc. can be used.
Will personal data be collected through digital images or video recordings (if faces are shown, it counts as personal data)?	Data Protection Approval needed.	Data Protection Approval not needed for this particular activity, but could be needed if linked with other directly or indirectly identifying personal data.

Table 1: Is personal data being collected? (Chapter 2.2.1 D95.31)

The table was also provided, as requested by several consortium members via the first Ethical Monitoring report, in D91.3 *Ethical Procedures, Risks and Safeguards.*

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[3] The table is based on information from the Norwegian Social Science Data Services (NSD). See. https://trygg.nsd.uib.no/personvern/meldeplikt/meldeplikttest

[4] Such as name or national identity number. See Chapter 2.2 for definition of personal data. Note that even if the information is meant to be anonymized in the final report etc. the collection of personal data would still happen and thus the answer here should be "yes".

[5] A person will be indirectly identifiable if it is possible to recognize the person via a combination of background information (such as municipality or workplace / school, combined with data such as age, sex, occupation, etc.). For it to be counted as personal data, this must be recorded in combination with other information so that people can be recognized.

2.4 The approval process during the restructuring of DRIVER

In addition to the abovementioned process of informing the consortium, some additional considerations should be mentioned relating to postponement and restructuring of DRIVER, following the Year 2 Review. Following the project suspension, many DRIVER tasks are ongoing, postponed or might start later than planned. Hence, it is very likely that research activities in need of approvals happen at a later stage in the project. The DRIVER partners had multiple opportunities to communicate these new dates, but it is important to keep in mind that many tasks are still at a planning stage, especially considering the restructuring of the project following the year 2 ad hoc reivew. While subprojects and work packages are currently being restructured (potentially resulting in new task numbers and merged activities etc.), the concrete outcome of the task and the planning of the research activities will have to be postponed. As a result of the suspension period, and the current restructuring, the ethical approval overview table presented in the next chapter will have to be formally updated once the final project structure has been implemented and improved. However, it is expected that for several of the activities, this update would simply mean replacing a task number with a new one. And generally and fundamentally, the research ethics guidelines provided in D91.3 is still the main document on research ethics for the partners, and should be consulted if necessary.

3 Overview of approval statuses

3.1 Explanation of approval statuses

As explained in the introduction to this deliverable, the activities in DRIVER that were flagged in D95.22 *Ethical Approval 1*, as (potentially) being in need of approval, can be divided in five different status categories. All these tasks are listed in the overview table below. As has been communicated to the DRIVER consortium on several occacions, it is formally the task leader who is ultimately responsible for obtaining such approval. The status of the various approvals relevant fort his second round of collecting ethical approvals, is indicated in the table below. To support the information in this table, the relevant communication and documentation is detailed in the next sections.

As can be seen below, some tasks or activities are covered by approvals from another task (meaning that it has been decided that application for approval or notifications to the DPA could be combined). In this case, all the tasks that are collected under one approval are listed in the first column of the table.

The approvals due in this round (covering M6-M18), fall under these five status categories:

1) **Registration completed:**
   a. Former years' procedures (in DRIVER and other research projects, such as the LASIE project[6]) have shown that not all Data Protection Authorities (DPA) issue approvals, but rather that the data protection procedure is completed by simply notifying the DPA, or by registering the project/ activity with the relevant DPA. In that case, the application form or registration form is attached in the annex to this deliverable for documentation.

2) **Approval received:**
   a. The needed approval for the task has been obtained, and can be found in the annex.

3) **No data is being collected/ no approval needed:**
   a. The task does not collect personal data at all, which means that the partners don't need approval. Why they are not collecting personal data is explained and documented in respective emails, which are archived at PRIO and can be forwarded upon request.

4) **Application in process:**
   a. An application to the respective data protection authority has been sent, but the answer is still pending. In that case, as agreed with the PO, the application form or registration form is attached in the annex for documentation, to demonstrate that the process is ongoing.

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[6] LArge Scale Information Exploitation of Forensic Data (LASIE). http://www.lasie-project.eu/

5) Activity postponed:

    a. The activity is being postponed, and the application will be part of the next round of approvals, i.e. Ethical Approval 3. Such explanations are archived at PRIO and can be forwarded upon request.

It may happen that a task lasts from M1 to M52, or lasts beyond the scope of one of the Ethical Approval- reporting periods. In that case, relevant research activities may start at a later stage. In that case, the task does not yet need approval and the task is not included in the list below, but transferred to the follow-up calendar to indicate the relevant time for approval.

All received documents and mails are archived at PRIO, and can be accessed upon request.

Tables 1, 2 and 3 are organized following the start activity of a task. Should several tasks start at the same time, they follow task numbering from low to high.

| Listed task (DoW and calendar) | Partner | Start activity | Status Category | | | | | |
			1	2	3	4	5	Cf. Ann ex Nr.
T32.2	DRC	M4, POSTPONED FROM ROUND 1[7]			X			
T32.3	DRC	M4, POSTPONED FROM ROUND 1			X			
T36.2	USTUTT	M10[8]	X					1
T36.2	AIT	M12	X					1
T24.3	FOI	M11			X			
T46.1	TCS	M11					X	
T52.1 & T52.2	FHG- IAO	M11		X				2
T61.1	DLR	M11			X			
T64.1	ATOS	M11				X		3
T53.1	FOI	M12	X					4
T34.2	USTUTT	M13	X					5
T35.4	Q4PR	M13					X	

[7] These answers were originally to be obtained in round 1, but due to the postponement of the task, the actual approval process was postponed.

[8] For T36.2 and T34.2, the attached emails document that contact has been initiated with the relevant data protection authorities. However, due to the current restructuring of the DRIVER project, the task leaders for these tasks report that the activities in these tasks will be restructured as well, and that additional details on the activities will be reported to the DPA eventually. These details will be included in the next round of approvals.

Task	Partner	Milestone						No.
T36.3/ 36.4	FRQ	M13	X					6
T27.2	JRC	M15			X			
T46.2	ATOS	M15					X	
T66.1	POLE	M18			X			
Received After Deadline For Round 1								
T85.1/ 85.2				X				7
Ongoing Tasks included in D95.22, not here								
T72.1	ARTTIC	M1		X				
T72.2	ARTTIC	M1		X				

Table 2: Overview Approval Statuses, round 2

4 No data is being collected

The table below lists the activities where is has been documented that no approval is/ was needed (cf. Status Category 3).

Task	Task partner	Mail date	Explanation
24.3	FOI	2015-10-02	No approval needed. The task is covered by other experiments. Email from FOI is stored, and documents this.
27.2	JRC	2015-10-02	No approval needed. The task is covered by other experiments. Email from FOI is stored, and documents this.
32.2	DRC	2015-04-30	WP32 does not need approval because no sensitive personal data is being collected. Signed letter from Danish DPA documents this.
32.3	DRC	2015-04-30	WP32 does not need approval because no sensitive personal data is being collected. Signed letter from Danish DPA documents this.
T43.3	JRC	2015-09-10	No approval needed. Email from JRC is stored, and documents this. However, 43.3 was also not on the list for Data Approvals, which is why it does not feature in the table above.
61.1	DLR	2015-09-19	No data will be collected. Email from DLR is stored, and documents this.
66.1	POLE	2015-09-02	The task is not collecting data. Email from POLE is stored, and documents this.

Table 3: No Approval Needed

All mails and attachments are archived by PRIO and retrievable on request by the Project Coordinator, Ethical and Societal Advisory Board or European Commission Project Officer.

5 Concluding remarks & Ethical Approval 3 Calendar

As this deliverable has shown, the approvals needed for the DRIVER tasks in the period M6-M18 have been obtained, some of which will need updating due to the current restructuring process. Such updates will be included in D95.24 Ethical Approval 3. The deliverable itself is not an input to any other DRIVER deliverable, since its purpose is to document an administrative procedure. It is part of a series of deliverables, the next one of which is due in M30. That deliverable will contain the approvals needed between M18 and M30, based on the current DoW. The calendar below indicates the tasks which are expected to require an approval, and thus be included in the Ethical Approval round 3.

Task	Task partner	Start Activity
T35.4	Q4PR	M13
T25.3	MSB	M19
T32.4	DRC	M19
T33.3	DRC	M19
T45.4	ITTI	M21
T46.3	ATOS	M21
T53.2	FOI	M22
T52.3	FHG-IAO	M23
T33.4	TNO	M25
T34.3	POLE	M25
T34.4	FHG-IAO	M25
T36.4 (already covered by T36.2)	AIT	M25
T83.2	FHG-INT	M25
T84.3 (Maike Vollmer has already confirmed that no approval is needed: email to Mareile/ Anne 09.10)	DIN	M25
T54.2	MDA	M27
T52.4	TNO	M29
T54.4	TNO	M29

Table 4: Calendar for Ethical Approval round 3 (M18-M30)

6 References

[1]   http://www.lasie-project.eu/

[2]   https://www.prio.org/Projects/Project/?x=1495

[3]   http://www.societalsecurity.net/

[4]   http://www.projectpact.eu/

Annexes

1: **Registration completed**

2: **Approval received**

3: **Application in progress**

Annex Nr.		1	2	3
1	T36.2 USTUTT	X		
1	T36.2 AIT	X		
2	T52.1 / T52.2	X		
3	T64.1			X
4	T53.1	X		
5	T34.2	X		
6	T36.3/ 36.4	X		
7	T85.1/ T85.2		X	

Table 5: Collected Approvals

Annex 1- T36.2 USTUTT/ T36.2 AIT:

-----Original Message-----
From: Bernd Desoi [mailto:desoi@zendas.de]
Sent: Tuesday, June 30, 2015 9:40 AM
To: Drews, Patrick
Subject: Re: [ZENDAS #13299] Fwd: Approval Data Protection Projekt DRIVER

Sehr geehrter Herr Drews,

haben Sie vielen Dank für Ihre Mail. Nach Durchsicht der Unterlagen, die uns Herr Wendt überlassen hat, kommen wir zu der Einschätzung, dass es angesichts der von Ihnen vorgesehenen Vorgehensweise tatsächlich keine Verpflichtung zu einer datenschutzrechtlichen Genehmigung gibt.
Ausgenommen natürlich einer solchen, der Sie sich als Konsortium kraft Ihres Antrags selbst unterworfen hat.

Bitte erlauben Sie uns an dieser Stelle den Hinweis, dass die datenschutzrechtliche „Genehmigung" einzelner Versuche angesichts des Volumens datenschutzrechtlicher Vorgänge an 9 Universitäten unsere Kapazitäten bei weitem übersteigen würde. Die ständige Einbindung des Datenschutzbeauftragten in Forschungsprojekte würde nicht nur die Kapazitäten übersteigen, sondern den Datenschutzbeauftragten zu einem Teil der Forschung selbst werden lassen. Dies lässt sich dauerhaft auch nicht mit der gebotenen Neutralität eines Datenschutzbeauftragten in Einklang bringen. Wir regen daher an, bei zukünftigen Projekten entsprechende Personalmittel für die Planung und Beantwortung derartiger Fragen vorzusehen. Insbesondere erkennen wir keinen Zusammenhang zwischen der „Ethical Approval" und dem Thema Datenschutz, die Fragen von Ethikkommissionen in der Forschung beschäftigen sich gerade regelmäßig mit Fragen der ethischen Durchführbarkeit, etwa im Bereich medizinischer Forschung.

Wir sehen uns daher nicht in der Lage, eine genaue inhaltliche Prüfung aller Einzelversuche durchzuführen. Das gilt vor allem für solche Versuche, die im Ausland durchgeführt werden sollen. Hier können wir die Wirksamkeit einer Einwilligung nicht abschließend beurteilen, da unserer Expertise auf das hierzulande anwendbare Datenschutzrecht begrenzt ist.
Ob eine uns vorgelegte Einwilligung etwa innerhalb Frankreichs wirksam ist, können wir nicht beurteilen.

Um dennoch zu einem für Sie zufriedenstellenden Ergebnis kommen zu können, schlagen wir zunächst vor, dass Sie uns die geplanten Versuche bzw. die Teilnehmerverwaltung und die dabei erhobenen personenbezogenen Daten (auch Interviewinhalte/Aufnahmen bei den Table Top Excercises? etc.) konkret erläutern. Hier sollten Sie deutlich machen, wo genau die Aufgaben im WP 36 liegen. Nach einer ersten Durchsicht dient das WP 36 wohl eher der Teilnehmerorganisation, ist diese Einschätzung richtig?
Wir würden lediglich Rückmeldung zu dem Konzept geben und erkennbar formulieren, dass wir keine detaillierte Einzelfallbetrachtung vorgenommen haben und keine schriftliche Genehmigung oder ähnliches erteilen. Auch hierzu fehlt uns die gesetzliche Ermächtigung.

Wir nehmen an, das eigentliche Ziel der Zufriedenstellung des zuständigen PO wird damit erreicht werden.

Mit freundlichen Grüßen

Bernd Desoi

> Datum: Wed, 13 May 2015 16:01:35 +0000
> Von: Drews, Patrick <Patrick.Drews@iao.fraunhofer.de>
> An: lumpe@zendas.de <lumpe@zendas.de>
> Kopie (CC): Engelbach, Wolf <Wolf.Engelbach@iao.fraunhofer.de>
>
>
>
> Sehr geehrter Herr Lumpe,
>
>
>
> Herr Wendt – mein Kollege hatte bereits Kontakt zu Ihnen in Sachen
> „Data Protection" für das Projekt „driver". Ich selbst bin für ein
> anderes Workpackage zuständig und muss nun ebenfalls ein Verfahren
> anstreben. Im Gegensatz zum bereits vorgestellten WP 34, in dem „nur"
> eine Befragung gemacht wird, sind wir im WP 36 auf Experimente mit
> Probanten in simulierten Einsatzübungen angewiesen. Hier müssen andere Daten (u.a.
> Bildmaterial) erheben. Darüber hinaus ist eine „Verwerfung"
> personenbezogener Daten nicht ganz so einfach möglich, da wir aus
> versicherungs- und haftungsrechtlichen Gründen sehr wahrscheinlich
> einen gewissen Zeitraum zumindest den Namen, Geburtsdatum und Adresse
> aufheben müssen.
>
>
> Daher wollte ich mich bevor wir in die Dateiplanung einsteigen mit
> Ihnen über unser Experiment austauschen, welche Daten und
> „Beschreibungen" Sie von uns benötigen, etc. Wann wäre dies denn aus Ihrer Sicht einmal möglich.
>
>
>
>
>
> Mit freundlichen Grüßen
>
>
>
> Patrick Drews
>

Annex 2- T52.1/ T52.2:

From: Dworschak, Bernd [mailto:Bernd.Dworschak@iao.fraunhofer.de]
Sent: Friday, October 02, 2015 4:03 PM
To: Stine Bergersen; Karapidis, Alexander
Cc: Mareile Kaufmann
Subject: AW: SP5 Final reminder- Ethical Approvals Round 2

Dear Stine and Mareile,

This approval (in German only) was sent to us by Mr Harter, Data Protection Officer of the Fraunhofer Society:

Hallo Herr Dworschak,

meinerseits keine Anmerkungen zu den von Ihnen übermittelten Unterlagen.

Mit freundlichem Gruß

Ralph Harter
Datenschutzbeauftragter

Fraunhofer Gesellschaft
Hansastrasse 27c
80636 München
Phone +49 89 1205-2045

-----Ursprüngliche Nachricht-----
Von: Dworschak, Bernd [mailto:Bernd.Dworschak@iao.fraunhofer.de]
Gesendet: Dienstag, 21. Oktober 2014 16:53
An: Harter, Ralph
Cc: Karapidis, Alexander, M.A.; Engelbach, Wolf, Dr.-Ing.; Wendt, Willi, Dipl.-Ing.
Betreff: AW: Data Protection Approvals

Hallo Herr Harter,

Im Anhang senden wir Ihnen in Analogie zu den Unterlagen von Frau Frech, die "Application" und den "Informed consent" für die Teilnehmer zur "Genehmigung".

Bitte melden Sie sich bei Fragen.

Beste Grüße
Bernd Dworschak

Bernd Dworschak, M.A.
Fraunhofer-Institut für Arbeitswirtschaft und Organisation (Fraunhofer IAO) CT Kompetenzmanagement

Nobelstr. 12
D-70569 Stuttgart

Tel.: ++49 (0) 711/ 970-2042
Fax: ++49 (0) 711/ 970-2299
E-Mail: Bernd.Dworschak@iao.fraunhofer.de

-----Ursprüngliche Nachricht-----
Von: ralph.harter@zv.fraunhofer.de [mailto:ralph.harter@zv.fraunhofer.de]
Gesendet: Freitag, 17. Oktober 2014 10:58
An: Dworschak, Bernd
Betreff: AW: Data Protection Approvals

Sehr geehrter Herr Dworschak,

konnten Sie die Unterlagen von Frau Frech verwenden. Ansonsten treten Sie mit mir nochmal in Kontakt.

Mit freundlichem Gruß

Ralph Harter
Datenschutzbeauftragter

Fraunhofer Gesellschaft
Hansastrasse 27c
80636 München
Phone +49 89 1205-2045

-----Ursprüngliche Nachricht-----
Von: Dworschak, Bernd [mailto:Bernd.Dworschak@iao.fraunhofer.de]
Gesendet: Donnerstag, 9. Oktober 2014 14:38
An: Harter, Ralph
Cc: Karapidis, Alexander, M.A.
Betreff: WG: Data Protection Approvals

Sehr geehrter Herr Harter,

Ich wende mich heute an Sie (siehe unten) wegen einer "Genehmigung" Interviews und Workshops im Rahmen des EU-Projektes DRIVER durchzuführen. Hierzu sind von jeden einzelnen Workpackage Genehmigungen notwendig. Können Sie mir sagen, wie wir weiter vorgehen sollen?

Ich versuche es gleich telefonisch bei Ihnen.

Beste Grüße

Bernd Dworschak

Annex 3- T64.1:

Kraus Sanchez, Fernando

From:	Kraus Sanchez, Fernando
Sent:	martes, 17 de marzo de 2015 18:41
To:	'internacional@aqpd.es'
Cc:	Sevilla Gonzalez, Raul; Martin Perez, Jaime (jaime.martinp@atos.net); Rodriguez Edroso, Jorge
Subject:	Proyecto DRIVER FP7 - Solicitud "ethical approval"
Attachments:	DRIVER presentation overview.pdf

Muy señores míos,

Atos España SA es coordinador del proyecto DRIVER (Driving Innovation in Crisis Management for European Resilience) financiado por el programa FP7 de la Comisión Europea.

DRIVER es un proyecto de innovación en la gestión de crisis con el objetivo de mejorar la resilencia europea. Es un proyecto demostrador, con 37 socios y 4 años y medio de duración. Adjunto una breve presentación del mismo. Su website es el siguiente http://www.driver-project.eu/

Dentro del proyecto se prevé numerosas entrevistas, workshops y actividades con expertos de diversa índole para la recogida de información en distintos ámbitos. El tipo de expertos que participará y su tipo de involucración prevista es la detallada a continuación, siendo esas actividades lideradas específicamente por Atos o teniendo Atos un papel relevante en las mismas.

- Experimentos (o tests propiamente hablando) para comprobar el correcto funcionamiento de ciertas soluciones técnicas para la recuperación de la cadena logística en situaciones de crisis. Se prevé la participación de expertos en logística como observadores. (Tarea T44.4 Bottlenecks & cascading effects y T44.5 Supply Chain Resilience)
- Se prevé la participación de profesionales en command and control center, situation awareness solutions como observadores y trainees en el diseño y preparación de los experimentos (Tarea T46.3 Experiments Preparation)
- Entrevistas en profundidad que serán llevadas a cabo con expertos en crisis management para la definición, ejecución y evaluación de una campaña de test o experimentos. Los experimentos o test se realizan a nivel de simulación de software o herramientas informáticas, sin que se prevea ejercicios que supongan un riesgo o stress a los participantes en los mismos. (Work Package WP64 Joint experimentation 2.)
- Se contactará a expertos externos al consorcio para recabar información sobre herramientas y plataformas usadas por el consorcio para el WP65 Overall assessment of the DRIVER portfolio
- Se contactará a expertos externos al consorcio para constituir una comunidad de usuarios con interés en gestión de crisis y desastres naturales (WP72 Driver Community y T82.4 Identification of Liaison partners)
- Se contactará a expertos externos al consorcio para recabar sus opiniones sobre la posible explotación profesional y comercial de las herramientas y plataformas utilizadas en DRIVER relacionadas la gestión de crisis y desastres naturales (Tarea T85.2 Exploitation of the DRIVER Portfolio of Tools)

Los principales datos personales que se les solicitará son los siguientes:
- Nombre,
- Organización,
- correo electrónico,
- Número de teléfono y
- Área de experiencia / interés.

No se prevé la solicitud adicional de información personal distinta a la mencionada. Esta información será utilizada por Atos únicamente dentro del proyecto DRIVER y dentro de los objetivos para la cual es recogida y no será enviada a personas ajenas al consorcio. Estas entrevistas, workshops , actividades, etc. están previstas dentro del marco del proyecto y su plazo de ejecución será como muy tarde octubre 2018, fecha fin de proyecto.

Antes de la entrevistas, solicitud información o de la participación de externos al proyecto en workshops, technical and software tests, table-top exercises o training, se informará a los participantes de los objetivos buscados, se les proporcionará información de qué es lo que va a realizar y se les pedirá que proporcionen un "informed consent"

Ruego confirmen que la recogida de dichos datos personales cumple con los requerimientos contemplados en la legislación en vigor de protección de datos en España.

Muchas gracias por anticipado

En caso de que requieran información adicional sobre el asunto de referencia, estaré encantado de proporcionársela

Saludos cordiales
Fernando

Fernando Kraus
Research & Innovation
Homeland Security & Defence Sector Manager
Mobile +34 675 592 006
fernando.kraus@atos.net
C. Albarracin 25
28037 Madrid, Spain
atos.net ; www.atosresearch.eu

Annex 4- T53.1:

FOI

ANMÄLAN OM BEHANDLING AV PERSONUPPGIFTER (PUL)

Blanketten fylls och insändes till SAK, FOI

Datum
2014-12-10

Avdelning/enhet

Kontaktperson	Telefon
Pär Eriksson	3823

Benämning på registret, forskningsprojekt etc

DRIVER - LESSONS LEARNED FRAMEWORK FOR CRISIS MANAGEMENT

Ändamål med behandlingen

Intervjuer inom ramen för ovan nämnda forskningsprojekt för att utröna roll och förutsättningar för erfarenhetsåterföring.

Kategorier av registrerade som berörs av behandlingen

Experter på krishantering och erfarenhetsåterföring i offentlig och privat verksamhet i Europa och Israel.

Personuppgifter som skall behandlas

De intervjuades namn, roll/position och organisationstillhörighet kommer att finnas i intervjuanteckningar. Annars intet.

Skall personnummer behandlas		Om ja, ange varför
☐ Ja	☒ Nej	

Skall samtycke från de registrerade inhämtas		Om nej, ange varför
☒ Ja	☐ Nej	

Är registret tillgängligt för andra myndigheter, institutioner eller enskild		Om ja, i vilken form
☒ Ja	☐ Nej	Intervjuerna analyseras gemensamt av projektets partners.

☒ Särskild förhandskontroll av Datainspektionen behövs inte

☐ Behandlingen har förhandskontrollerats av Datainspektionen och godkänts.

Skall personuppgifter överföras till utlandet

☒ Ja (ange till vilka länder, i vilken omfattning etc i en särskild bilaga)   ☐ Nej

Vid behandling av personuppgifter för forsknings- och statistikändamål

Forskningsetikkommittens anteckningar

Eventuella sekretessbestämmelser

Datum för beslut	Diarienummer

☐ Behandlingen har godkänts   ☐ Behandlingen har inte godkänts   ☒ Godkännande behövs inte

Underskrift (avdelnings- stabschef eller ansvarigkontaktperson)

Datum	Namnteckning	Namnförtydligande
2014-12-05		Pär Eriksson

Personuppgiftsombudets anteckningar

När anmälan är undertecknad av avdelnings/stabschef och innan behandlingen av personuppgifter påbörjas skickas anmälan till registrator, som efter registrering sänder den vidare till personuppgiftsombudet.

Underskrift (behandlingen asv personuppgifter enligt denna anmälan har upphört)

Datum	Namnteckning	Namnförtydligande

Annex 5- 34.2:

From: Wendt, Willi [mailto:Willi.Wendt@iao.fraunhofer.de]
Sent: Wednesday, July 01, 2015 11:34 AM
To: Mareile Kaufmann
Subject: DRIVER Data Protection Approval WP34

Hi Mareile,

wir haben jetzt von der Datenschutzbehörde folgende Antwort auf unsere Anfrage erhalten. Könnt ihr mit der angebotenen Vorgehensweise (letzter Absatz) leben?

Das würde dann übrigens für alle SP3 Experimente gelten, die von uns als Uni Stuttgart in Lead betreut werden (WP34, 35 und 36).

LG,
Willi

Von: Bernd Desoi [mailto:desoi@zendas.de]
Gesendet: Dienstag, 30. Juni 2015 09:08
An: Wendt, Willi
Betreff: [ZENDAS #13204] Fwd: [Zendas #13204] DRIVER Approval

Sehr geehrter Herr Wendt,

haben Sie vielen Dank für Ihre Mail. Angesichts der von Ihnen vorgesehenen Vorgehensweise gehen wir davon aus, dass es tatsächlich keine Verpflichtung zu einer datenschutzrechtlichen Genehmigung gibt. Ausgenommen natürlich einer solchen, der Sie sich als Konsortium kraft Ihres Antrags selbst unterworfen hat.

Bitte erlauben Sie uns an dieser Stelle den Hinweis, dass die datenschutzrechtliche „Genehmigung" einzelner Versuche angesichts des Volumens datenschutzrechtlicher Vorgänge an 9 Universitäten unsere Kapazitäten bei weitem übersteigen würde. Die ständige Einbindung des Datenschutzbeauftragten in Forschungsprojekte würde nicht nur die Kapazitäten übersteigen, sondern den Datenschutzbeauftragten zu einem Teil der Forschung selbst werden lassen. Dies lässt sich dauerhaft auch nicht mit der gebotenen Neutralität eines Datenschutzbeauftragten in Einklang bringen. Wir regen daher an, bei zukünftigen Projekten entsprechende Personalmittel für die Planung und Beantwortung derartiger Fragen vorzusehen. Insbesondere erkennen wir keinen Zusammenhang zwischen der „Ethical Approval" und dem Thema Datenschutz. Die Fragen von Ethikkommissionen in der Forschung beschäftigen sich gerade regelmäßig mit Fragen der ethischen Durchführbarkeit, etwa im Bereich medizinischer Forschung.

Wir sehen uns daher nicht in der Lage, eine genaue inhaltliche Prüfung aller Einzelversuche durchzuführen. Das gilt vor allem für solche Versuche, die im Ausland durchgeführt werden sollen. Hier können wir die Wirksamkeit einer Einwilligung nicht abschließend beurteilen, da unserer Expertise auf das hierzulande anwendbare Datenschutzrecht begrenzt ist. Ob eine uns vorgelegte Einwilligung etwa innerhalb Frankreichs wirksam ist, können wir nicht beurteilen.

Um dennoch zu einem für Sie zufriedenstellenden Ergebnis kommen zu können, schlagen wir zunächst vor, dass Sie uns die geplanten Versuche und die dabei erhobenen personenbezogenen Daten (auch Interviewinhalte/Aufnahmen bei den Table Top Excercises? etc.) konkret erläutern und Ihr wohl vorgesehenes Anonymisierungskonzept beschreiben. Wir würden lediglich Rückmeldung zu dem Konzept geben und erkennbar formulieren, dass wir keine detaillierte Einzelfallbetrachtung vorgenommen haben und keine schriftliche Genehmigung oder ähnliches erteilen. Auch hierzu fehlt uns die gesetzliche Ermächtigung.

Wir nehmen an, das eigentliche Ziel der Zufriedenstellung des zuständigen PO wird damit erreicht werden.

Mit freundlichen Grüßen

Bernd Desoi

Annex 6- T36.3/ T36.4:

dsb

Republik Österreich
Datenschutz
behörde

A-1010 Wien, Hohenstaufengasse 3
Tel.: ++43-1-53115 202525
Tel.: ++43-1-53115 204043
E-Mail: dsb@dsb.gv.at
DVR: 0000027

AIT Austrian Institute of Technology GmbH
z.H. Jasmin Pielorz / AIT Austrian Institute of Technology GmbH Digital Safety &
Security
Donau-City-Straße 1, 1220 Wien, Österreich
jasmin.pielorz@ait.ac.at

Betreff: Meldung – DSG 2000
Verwendung von Daten gemäß §46 Absatz 3 DSG 2000 Projekt DRIVER
Meldedatum: 01.10.2015
DVR-Nr.: 0594636

Registrierungsdatum: 01.10.2015

Sehr geehrte Auftraggeberin,
sehr geehrter Auftraggeber,

Ihre Meldung gemäß Datenschutzgesetz 2000 wurde nach einer Plausibilitätskontrolle durch das System automatisch registriert.

Ihren Registerauszug können Sie in Ihrem Meldebereich oder über die DVR-Recherche nach Klick auf den Button „Registerauszug" aufrufen und ausdrucken.

Falls in Zukunft Umstände eintreten, die nachträglich die Unrichtigkeit und Unvollständigkeit der registrierten Meldung bewirken, sind diese Änderungen zu melden, damit eine Aktualisierung im Register erfolgen kann.

Mit besten Grüßen

DATENSCHUTZBEHÖRDE
Datenverarbeitungsregister
Hohenstaufengasse 3
1010 Wien

DVR: 0000027

Signaturwert	Ep2pFxRLSO7YMIGAPLhAjJfi3gLH+q6tjk8AXjuWgBrGdhU99i5dZKg+1MTlnEeLEaO4m IqPA/uwjlPMxWAJ1/eTfKH6/kE+5QabVBKPHr4jWf5xF8dxlf5BMh3Dn0EzxvP3Ghygj4 1nFCC+me7IISP/+aaKzDQJl7tKEy4jZXnoi05c2R2sCZKc1knvgeficb5IOuhTR2yOnbh IsJLFE4p6uRldP7QhNaTKwqZAtYPfhD8nqlcvMlMv6Mhm5RaCaP7GGXRpybz9rmTp181T 6RDmiYQRFxV2qhWyO6g8heZIIIBJliKYnuqgq6sBsiWrQl3QhR5iVjR8baBJ53E3vQ==
Unterzeichner	serialNumber=117229306313,CN=Datenschutzbehörde,C=AT
Datum/Zeit	2015-10-01T11:28:58+02:00
Aussteller-Zertifikat	CN=a-sign-corporate-light-02,OU=a-sign-corporate-light-02,O=A-Trust Ges. f. Sicherheitssysteme im elektr. Datenverkehr GmbH,C=AT
Serien-Nr.	1119505
Hinweis	Dieses Dokument wurde amtssigniert.
Prüfinformation	Informationen zur Prüfung der elektronischen Signatur finden Sie unter: http://www.signaturpruefung.gv.at Informationen zur Prüfung des Ausdrucks finden Sie unter: http://www.bka.gv.at/verifizierung

dsb

Republik Österreich

Datenschutz
behörde

A-1010 Wien, Hohenstaufengasse 3
Tel.: ++43-1-53115 202525
Tel.: ++43-1-53115 204043

E-Mail: dsb@dsb.gv.at
DVR: 0000027

Angaben zur Datenanwendung
Meldung einer Datenanwendung (gemäß Anlage 2 DVRV 2002BGBl. II Nr. 24/2002)

Art der Meldung:
☑ Neumeldung einer Datenanwendung
☐ Änderung einer Datenanwendung

Bezeichnung der Datenanwendung und Zweck der Datenanwendung
Verwendung von Daten gemäß §46 Absatz 3 DSG 2000 Projekt DRIVER

Registernummer:
0594636

Nummer der Datenanwendung
0594636/023

Name (sonstige Bezeichnung) und Anschrift des Auftraggebers:
AIT Austrian Institute of Technology GmbH
Donau-City-Straße 1
1220 Wien
Österreich

Telefon- und Faxnummer sowie E-Mail-Adresse des Auftraggebers:
Tel.: 050550-0; Fax 050550-2201
dirk.holste@ait.ac.at

Vertreter des Auftraggebers:

Vertreter des Auftraggebers in der EU bei der Datenanwendung:

Datenschutzbeauftragter:

Die Datenanwendung gehört zum
☑ privaten Bereich

□ öffentlichen Bereich

Die Datenanwendung erfolgt
☑ automationsunterstützt
□ manuell

Angaben zur Anwendbarkeit der Vorabkontrolle (§ 18 Abs. 2 DSG 2000):
□ Verwendung von sensiblen Daten
□ Verwendung von strafrechtlich relevanten Daten
□ Vorliegen eines Kreditinformationssystems
□ Vorliegen eines Informationsverbundsystems
□ Videoüberwachung (gemäß § 50c DSG 2000)
☑ Vorliegen keiner der Voraussetzungen

Rechtsgrundlage(n) für die gemeldete Datenanwendung
§46 DSG 2000 Datenanwendung im Rahmen eines Forschungsauftrages der Europäischen Kommission - Projekt Driver/FP7-SEC-2013-1

Bescheid der Datenschutzbehörde (Internationaler Datenverkehr gemäß § 13 DSG 2000):

Bescheid der Datenschutzbehörde (Auflagenbescheid gemäß § 21 Abs. 2 DSG 2000):

Besondere Angaben zum Inhalt der Datenanwendung:

Betroffene Personengruppen	Datenarten	Nummern der Empfängerkreise
Personen die sich zufällig im Beobachtungsfeld aufhalten	Fotos	01, 02

Beabsichtigte Übermittlungen aus dieser Datenanwendung:

Nummer und Bezeichnung des Empfängerkreises		Rechtsgrundlage für die Übermittlung
1	Österreichisches Rotes Kreuz (ÖRK)	Forschungsauftrag der Europäischen Kommission - Projekt Driver/FP7-SEC-2013-1
2	Frequentis	Forschungsauftrag der Europäischen Kommission - Projekt Driver/FP7-SEC-2013-1

| Signaturwert | amcW008TkgO6+p2DBj5vtxeY9b+D3WMFgpk4CcEN3z4mw6TZnMJZ4ihfCP+eAYeSUw8pw mYLXilBkoJ08jY2mhDtlyDpYAUiQt1Q9TgkrNngpvxZobo6w7L/lq/K0Yt9QMLGMfjeqH UBmSabPuEAWZ2cBwhZ0HOBnhUFkXDL6kJ+bRdmTnxR/0ESNX7JXQKurkwcZdQEX/TVJVB lXgl9OAtAhxh3yT/ffHz962dLrowDGvyfVjDtKjhDkOUPVkC+Gdf56UE0bb/KyQXGg4MQ GOmJZxQU8vZZNtv+84IDJ6S2aJbBTkqs3HRMWbTVho8tiqF+IQaRCOMc9MeDv8eKfQ== |

	Unterzeichner	serialNumber=117229306313,CN=Datenschutzbehörde,C=AT
	Datum/Zeit	2015-10-09T09:50:40+02:00
	Aussteller-Zertifikat	CN=a-sign-corporate-light-02,OU=a-sign-corporate-light-02,O=A-Trust Ges. f. Sicherheitssysteme im elektr. Datenverkehr GmbH,C=AT
	Serien-Nr.	1119505
Hinweis	Dieses Dokument wurde amtssigniert.	
Prüfinformation	Informationen zur Prüfung der elektronischen Signatur finden Sie unter: http://www.signaturpruefung.gv.at Informationen zur Prüfung des Ausdrucks finden Sie unter: http://www.bka.gv.at/verifizierung	

Annex 7- T85.1/ T85.2:

IIIIIIIIIIIII
COLLEGE BESCHERMING PERSOONSGEGEVENS

POSTADRES Postbus 93374, 2509 AJ Den Haag BEZOEKADRES Juliana van Stolberglaan 4-10
TEL 070 - 88 88 500 FAX 070 - 88 88 501 E-MAIL info@cbpweb.nl INTERNET www.cbpweb.nl

AAN Ecorys Nederland B.V.
t.a.v. Mevr. L.K. Birkman
Postbus 4175
3006 AD ROTTERDAM

DATUM 1 december 2014
ONS KENMERK m1580466
CONTACTPERSOON

UW BRIEF VAN 10-11-2014
UW KENMERK Analyse v adviezen / geg.
voortkomend uit interviews,
workshops, questionnaires

ONDERWERP Ontvangstbevestiging

Geachte mevrouw Birkman,

Het College bescherming persoonsgegevens (CBP) ontving van u een melding van de verwerking van persoonsgegevens met de naam: Analyse v adviezen / geg. voortkomend uit interviews, workshops, questionnaires.
Uw melding is in onze administratie opgenomen onder meldingsnummer m1580466.
Wij verzoeken u dit meldingsnummer ook in uw eigen administratie op te nemen.

Het CBP neemt alle meldingen op in een openbaar register op zijn website www.cbpweb.nl. Dit register is door een ieder kosteloos te raadplegen.

Deze brief is een bevestiging van het feit dat u voor deze verwerking aan uw meldingsverplichting conform de Wet bescherming persoonsgegevens (Wbp) heeft voldaan. De brief is geen verklaring van het CBP dat de verwerking rechtmatig is. De verwerking is door het CBP niet inhoudelijk getoetst. Het blijft de verantwoordelijkheid van degene die meldt om de verwerking op een juiste en volledige wijze te doen en om zich te houden aan de overige bepalingen van de Wet bescherming persoonsgegevens (Wbp).

U bent wettelijk verplicht om een wijziging in de naam of het adres van de verantwoordelijke binnen één week te melden. Wijzigingen in de overige gegevens moeten binnen één jaar gemeld worden voor zover zij van meer dan incidentele aard blijken te zijn.

Indien u vragen heeft naar aanleiding van deze brief kunt u contact opnemen met het CBP via telefoonnummer 070 8888500. Wij verzoeken u om uw meldingsnummer dan bij de hand te hebben. Ook bij eventuele nadere correspondentie omtrent deze melding verzoekt het CBP u dit nummer te vermelden.

Hoogachtend,

Mw. Y. Ferrier
Medewerker Informatiebeheer.