



D1.4 – DMP M18

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Abstract

Considering the ethical dimensions of the ECARE project, a strict conformity to GDPR rules has to be ensured in order to protect personal data of consortium members, ESG members and third parties. Particular attention is placed on data protection of people interviewed in the frame of WP3, participants of ECARE Workshops, as well as of people registering to the ECARE digital platform. A specialized Data Management Plan (DMP) was created in M6 of the project (submitted as D1.3), detailing the proposed ECARE methodology for ensuring that the personal data collected, processed and generated throughout the project, are properly protected, managed and maintained all along its duration. The ECARE DMP is considered a living document and is continuously updated and specified. The present document includes all relevant updates performed in the ECARE DMP from M6 until M18.

Keywords

Data Management Plan, personal data, data protection, processing, IPR, GDPR

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Table of Acronyms

ACARE	Advisory Council for Aeronautics Research in Europe
CA	Consortium Agreement
CAJU	Clean Aviation Joint Undertaking
DM	Dissemination Manager
DMP	Data Management Plan
DPO	Data Protection Officer
EC	European Commission
ECARE	European Clean Aviation Regional Ecosystem
ESG	ECARE Stakeholder Group
EU	European Union
FAIR	Findable, Accessible, Interoperable, Reusable
GA	Grant Agreement
IP	Intellectual Property
IPR	Intellectual Property Rigts
OA	Open Access
PEDR	Plan for the Exploitation and Dissemination of Results
PC	Project Coordinator
PU	Public
SRIA	Strategic Research and Innovation Agenda

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Introduction

With regards to Intellectual Property Rights (IPR), the ECARE Coordination and Support Action is not expected to produce any technological information to protect. Yet, it continuously stimulates the exchange of information, thus becoming a receptacle for information of IPR relevance. EASN-TIS, as the ECARE Dissemination Manager (DM), is responsible for monitoring all planned and performed dissemination activities and ensure that the relevant Consortium Agreement (CA) and Grant Agreement (GA) requirements are respected; as well as that the involved parties' IPR are properly protected from unauthorized use or any other kind of misuse. Furthermore, the volume of knowledge and the associated data collected, processed and stored throughout the ECARE project is large. Thus, it is essential that they are properly managed, protected and maintained. Consequently, and whilst bearing in mind the importance of Open Science and Open Innovation, a concrete strategy for the data management has been defined early on the project, paying special attention to IPR protection and GDPR, while allowing at the same time data-sharing, by making data generated in the frame of the project publicly available.

Precisely, in order to regularise the exchange and availability of the ECARE related information and results, a dedicated Data Management Plan (DMP) was formulated in Month 6 of the project (submitted as D1.3) so as to provide an overview of the ECARE consortium's proposed methodology for data management. Namely, the ECARE DMP describes, inter alia, the process and schedule for the production of the ECARE related dissemination materials and publications, in line with the EU standards and the signed agreements of the project (CA and GA). Furthermore, it illustrates the consortium's strategy on how to efficiently manage, protect and maintain the data collected, processed, stored and generated by the project. Particular attention is given on the data protection of people interviewed within WP3, participants of ECARE Workshops, as well as on people registering to the ECARE digital platform. Lastly, the ethical dimensions, aspects and requirements of the project are addressed and elaborated, in conjunction to the EU standards and the relevant legal framework.

The ECARE DMP has been treated as a living document and as such has been regularly updated and specified over the course of the project, in line with the overall progress and activities taking place. The present document consists of an elaborated version of the previous DMP, including all relevant updates and developments performed from M6 until M18 of the project, thus materializing the delivery of ECARE D1.4 (DMP M18). It shall be stressed, that no significant changes or unexpected issues occurred (such as for example, inclusion of new unforeseen data sets, changes in the consortium policies, unforeseen external factors, etc.). Therefore, no major updates or modifications had to be performed to the original ECARE data management strategy defined at the early stages of the project. The main amendments have to do with the elaboration of the main types and formats of the data that ECARE has collected/ stored/ derived/ generated over its lifecycle; as well as the amplification of how said data are FAIR (Findable, Accessible, Interoperable and Reusable), thus fostering the collaboration, encouraging knowledge sharing and enabling the re-usability of the project's valuable outcomes. Moreover, the present updated ECARE DMP version, describes the actions that have been implemented towards meeting the ethical requirements of the project (i.e. in the frame of the WP3 Interviews, the ECARE workshops and the ECARE digital platform development). Said actions ensure a strict conformity to general GDPR rules in order to guarantee the protection of personal data of project partners and third parties.

1 ECARE general principles for data management

1.1 Knowledge management and IPR protection

Effectively exploiting the new knowledge, information and results produced in the frame of collaborative projects, largely depends on the proper management and protection of intellectual property. This fact is prominently considered throughout the overall knowledge management procedure in ECARE. Precisely, specific steps are taken for protecting the legitimate interests of the involved parties, respecting both the background introduced to the project, as well as the foreground developed. Therefore, special attention is placed on ensuring the effective knowledge management and protection (including IPR). As regards Intellectual Property Rights, in particular, this Coordination and Support Action is not expected to produce any technological information to protect, but it surely stimulates the exchange of information, and thus becomes a receptacle for information of IPR relevance.

In general, there are four (4) main types of intellectual property assets in the context of collaborative EU funded projects: background, foreground, sideground and postground intellectual property. The two latter ones, are newer types of IPs that are not applicable in the ECARE case. Namely, sideground IPR refers to any knowledge/IP that is produced outside of the project by any of the partners during the project's tenure; while postground IPR refers to any knowledge/IP produced by any of the project partners after the project ends. Applicable and relevant to the ECARE case are the two former types, i.e. background and foreground IPR, as they respectively refer to the knowledge/IP supplied by the partners at the start of the project, as well as to the knowledge and results produced throughout the project development.

Before the beginning of ECARE, in order to properly manage the project (including the results and IPs generated in its course), as well as the relationship between the involved parties, including in particular the organization of the work between them as well as their respective obligations and rights (including IPR), all ECARE consortium members signed a Consortium Agreement (CA). This document aimed to guarantee the efficient protection on sharing information, and thus ensure the smooth and successful implementation of the project. Namely, some of the main principles declared in the ECARE CA cared to fittingly distinguish and manage background and foreground knowledge, ownership and access rights, including dissemination and sharing of results. Especially, among the issues that the CA treated are the following:

- Access rights to results and background for implementation and exploitation, in consideration of the pre-existed IPR and each Party's contribution to the generation of results and related new or emergent IPR;
- Non-disclosure of information among Parties involved in the project, along with confidentiality policy towards third parties;
- Ownership of results, reflecting the prospect of joint ownership of results for future exploitation;
- Transfer of knowledge and results to those third parties interested in exploiting ECARE results;
- Dissemination of own results and another Party's Results or Background.

To ensure the sound implementation of the ECARE activities and tasks, all partners have agreed to grant each other Access Rights to Results and Background (knowledge or information, IPR) — on a royalty-free basis — for performing their own tasks under the Action. Furthermore, Access Rights for other beneficiaries, for exploiting their own results, shall be granted under fair and reasonable conditions set

out in Article 9.4.1. Additionally, the involved parties have identified and agreed on the Background for the Project and have also, where relevant, informed each other that Access to specific Background is subject to legal restrictions or limits.

Property rights management is an issue of utmost importance to ECARE and as such is dealt with the elaboration of specific provisions concerning intellectual property rights (IPR) applied among Parties (including third parties). The ECARE relevant strategy assures that these requirements are in full compliance with the general and specific provisions specified in the project's CA and GA relevant Articles. Accordingly, foreground results (including IPR) shall be owned by the project partner carrying out the work leading to such results. If any Foreground results are generated jointly by at least two project partners, and it is not possible to either establish the respective contribution of each beneficiary or to separate them, for protection reasons; such work will be jointly owned, by the contributing project partners. Any further details concerning the exposure to jointly owned foreground results and IPR have been firmly described in the CA and GA.

1.2 Dissemination of results

Under the condition that prior notice of any planned dissemination of own Results by one or several Parties, including but not restricted to publications and presentations, is given to the other ECARE partners before the dissemination occurs, during and for one year after the end of the Project; a dedicated monitoring process has been set up, governed by the procedure of Article 8.4 of the CA and Article 17.4 of the GA and its Annex 5. This approach was prudently defined considering that each Party shall not include in any dissemination activity another Party's Results or Background (data, know - how or information, IPR) without obtaining the owning Party's prior approval.

Precisely, a project party intending to perform a dissemination activity shall give advance notice to the other beneficiaries of at least 45 days. The other parties have the right to object within 30 calendar days of receiving notification. In such cases, the dissemination may not take place unless appropriate steps are taken to safeguard these legitimate interests. Any objection to the planned publication shall be made in accordance with the GA in writing, including an explicit request for necessary modifications, to the Coordinator and the Party or Parties proposing the dissemination within 30 calendar days after receipt of the notice. If no objection is made within the time limit stated above, the publication is permitted.

Communication, Dissemination and Exploitation are considered collective activities, coordinated and organized by the DM, yet executed by the entire ECARE consortium. Over the course of the project, all partners perform dissemination and communication actions such as participation in relevant events and conferences, distribution of ECARE communication materials (e.g. leaflets, posters, brochures, press releases, newsletters, etc.), project related publications, organization of project-related networking events, etc. EASN-TIS, in its role as the project's DM, is responsible for continuously monitoring all planned and performed dissemination and communication activities, so as to ensure that the CA and GA requirements are respected and that the involved parties IPR are effectively protected from unauthorised use or any other kind of misuse. At all times, special attention is given at ensuring that knowledge protection rules and requirements stated within the CA and GA are fully respected.

1.3 FAIR data principles

The ECARE consortium’s proposed methodology for effectually managing and protecting the data collected, processed and generated throughout the ECARE project, depicts under the FAIR principles. These fundamentals state that the data produced shall be Findable, Accessible, Interoperable and Reusable (FAIR) and shall be applied to any project that creates, collects or processes research data. With the endorsement of the FAIR principles and its incorporation into the European Commission’s relevant guidelines for Data Management Plans, the FAIR principles serve as a template for a full-lifecycle data management, following the signed GA and CA.

Although the “FAIR” principle does not act as an independent lifecycle data model, it assures that it covers the essential components of a full-lifecycle model. Hence, these FAIR principles are accordingly observed and implemented during the entire lifespan of ECARE, provided that the implementation of the FAIR principles is proposed as a conceptual integration rather than a technical integration.

1.4 Open access to publications

Publishing new knowledge and results is a fundamental part of any process. Accordingly, making sure that any publications generated within the ECARE project are duly granted Open Access (OA), is an integral part of the ECARE data management strategy. In this context, all public documents related to the project’s results, is made available online to any user free of charge. A dedicated section for public documents and results, has been created on the ECARE public website, under the “Deliverables” section.

Moreover, the dissemination of knowledge produced through EU funding, is inextricably linked to free OA to any peer-reviewed scientific publication made within the context of any EU-funded project. This aspect is mandatory under Annex 5, Articles 16 and 17 of the Model GA and to meet this requirement, beneficiaries must, at the very least, ensure that any scientific peer-reviewed publications can be read online, as well as that are downloadable and printable. The following OA options are available:

- Self-archiving / “green” OA: The author, or a representative archive (deposit) the published article or the final peer-reviewed manuscript in an online repository of their choice, before, at the same time as, or after publication. In this case, they must ensure open access to the publication within a maximum embargo period up to 12 months.
- Open access publishing / “gold” OA: Authors, make a one-off payment to the publisher so that the scientific publication is immediately published in open access mode.

Any scientific publications that may arise from the ECARE project, shall be made known preferably through the option of “gold” or “green” Open Access, under “Open Access Publishing Agreement” on a case-by-case basis.

2 Data sets collected and generated

An elaborated list of the main types and formats of the data collected / stored / derived / generated within the ECARE project up until M18 follows, as well as an amplification of how said data are FAIR (Findable, Accessible, Interoperable and Reusable), thus fostering collaboration among researchers, encouraging knowledge sharing and enabling the re-usability of the project’s valuable outcomes.

2.1 Data Summary

Table 1: Types and formats of data collected and generated in ECARE

Guideline	Statement
Primary Data Description	Qualitative & Quantitative Data: interviews, workshops, questionnaires
Data Types collected / stored / derived / generated	<p>Primary Data: Collected data through surveys, interviews and/or questionnaires. Collected data from ESG webinars.</p> <p>Secondary data: Published data sources, public sector records, organisations records and administrative data</p>
Description of data collected / stored / derived / generated	<ul style="list-style-type: none"> • List of interviewed, experts, stakeholders, national and transnational workshops participants and ESG members (related personal information) • Templates, materials and documentation • Interviews', questionnaires' and workshops' related data • Queries documentation (transcripts verbal communication), digital copies of workshop/interview graphical material (sketches, post-it notes, flip-over sheets) • Peer-reviewed publications • Dissemination, Exploitation and Communication data (PEDR, DMP, dissemination and communication materials) • Ethics requirements related templates • Manuscripts (deliverables, publications and internal documents)
Data to be re-used (if any)	<ul style="list-style-type: none"> • Past or running related funding call findings • Past or running related projects' findings • Interviews', questionnaires' and workshops' related data • "Lessons Learnt" loops
Data Origin	<ul style="list-style-type: none"> • Interviews', questionnaires' and workshops' related data • Deliverables and internal documents • Public sector records, organisations records and administrative data • EC and CA JU database
Data underpinning publication	Conferences, journal articles, publications and presentations

Guideline	Statement
Format of data collected / generated	<ul style="list-style-type: none"> Quantitative: MS Excel (.xls/.xlsx), MS Access (.mdb/.accdb), dBase (.dbf), ODS (.ods), (.txt), etc. Documentation: Plain text (.txt), MS Word (.doc/.docx) or MS Excel (.xls/ .xlsx), XML marked-up text (.xml) according to an appropriate DTD or schema, e.g. XHTML 1.0 PDF/A or PDF (.pdf).xls(x)/.doc/.pdf/.ppt(x), etc. Digital image data: JPEG (.jpeg, .jpg) TIFF (other versions; .tif, .tiff) JPEG 2000 (.jp2) Adobe PDF (PDF/A, PDF) (.pdf), etc.

2.2 FAIR Data

2.2.1 Findable and Interoperable Data

Table 2: Standards and metadata types applied, regarding the collection and creation of data

Guideline	Statement
Methodologies and Standards for collecting and/or creating data	<ul style="list-style-type: none"> Collecting data from individuals or groups of people, such as interviews, surveys, questionnaires and webinars. Retrieving existing documents and data from reviewing different existing sources (such as SRIA, ACARE, other relevant project's public reports, etc.), existing inventories catalogues and databases
Collected/generated data special software, hardware or any particular technique or tool requirements to be "read" or interpreted outside of the context where it has been collected/produced	Documentation such as informed consent forms and information sheets have been developed according to the ECARE ethics requirements (see sections below)
Metadata Types captured and generated to describe the data and to aid discovery	Descriptive & Structural metadata
Disciplinary metadata standards directory to aid interoperability	To be defined at the end of the project.

Persistent Standard Identification Mechanism	To be defined at the end of the project.
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2.2.2 Accessible Data and Reuse – Data Sharing

Table 3: Data exploitation and sharing, for verification and re-use

Guideline	Statement
Policy & Conditions for Sharing data produced or used	<ul style="list-style-type: none"> • Open Data Access; under the provision that certain datasets cannot or /and need to be shared under restrictions / postponed for legal and contractual reasons; prior written approval, and under fair and reasonable conditions. • ECARE public website provides open access to public (PU) documents, reports and dissemination materials. • Human & personal data involvement (e.g. interviews, workshops, events, list of subject matter experts). Interview data: the data are exploited by analyzing their intellectual content and are only used for the purposes of the ECARE state-of-the-art analysis, explicitly elaborated. The workshop related documentation and material are analyzed intellectually and solely serve the purposes of the ECARE state-of-the-art analysis, explicitly elaborated. • Data sharing and diffusion only applies to the acquired data for which consent has been given, or the results arising from their process. • Data will be maintained for no longer than is necessary for the purposes for which the data were collected or for which they are further processed. User data will be erased when informed consent is withdrawn or upon cancelation of an account. • See further details included in the relevant section below (“ECARE ethical protocol”).
Dissemination/Media Policy and technical mechanisms to make data and metadata available to others	Under the ECARE Plan for Exploitation and Dissemination of Results (PEDR) deliverables (see D6.1).
Deposition Policy addressing security and recovery	Local Storage (PC, local file server) and Cloud-Based Storage (ECARE Website and Cloud Aerospace Valley teamsite) with proper IPR protection provision under sufficient infrastructure standards and security protocols.

Data Access Policy and Restricted area approach and requirements to validate and re-use data	<ul style="list-style-type: none"> • Dedicated restricted access electronic data storage system area: the Aerospace Valley Nextcloud teamsite, accessible by all project partners • Security, privacy, confidentiality, IPR and other rights (level of safety clearance protocols) to manage all the data produced and collected by the consortium
Linking publications to "underlying" data. Repository Type selected	Centralised repositories and Institutional repositories
Data Access Policy and Embargo periods (if any)	Following "Open Access Publishing Agreement"
Intellectual Property Policy	Under CA and GA relevant Section on "Rights and obligations related to background and results."
Data clarifying Licenses and reuse & Usable data by Third Parties	In accordance to GA relevant section of "Rights and obligations related to background and results" & CA: Articles 4,5,8, and 9.

2.3 Data Preservation and Archiving (including storage and backup)

Table 4: Curated and preserved data during and after the project

Guideline	Statement
Identification of which data needs to be preserved during and beyond the lifetime of the project.	<ul style="list-style-type: none"> • Interview reports, workshop report, collected data including reference to the sources (if from public documents) • Preliminary ECARE reports and final deliverables
Project database Preservation Policy (including storage and backup)	<ul style="list-style-type: none"> • Sufficient storage provisions under the project data volume • Backup frequency and replication in multiple copies in the online system on a regular basis • Operational timetable requirements beyond the project lifetime.
Data sets stored in an established repository to enhance sustainability of the access to data associated metadata, documentation and code	Details on the resources and systems in place to enable data to be curated fruitfully beyond the lifetime of the project will be specified at the end of the project, in line with the signed GA and CA.

Minimum timeframe regarding the physical and cyber resources and facilities that will be used to secure and back up data	Ten years after the end of the project
Data maintenance (sustainability of the access to data) beyond the lifetime of the project	To be specified at the end of the project in accordance to the signed GA, CA

2.4 Ethical aspects and GDPR

It is a collective responsibility of the entire ECARE consortium to commonly ensure that all ethical requirements are properly met with regards to every activity undertaken in the frame of the project, including data management aspects, in compliance with the EC relevant ethical standards. Data protection and good research ethics, are of utmost importance to this project's beneficiaries, who agree to undertake all necessary actions in order to ensure that no sensitive or personal information is misused. In this frame, it shall be noted that all processes of data generation and data sharing are documented and approved by the entire consortium, thus ensuring highest standards of data protection. Precisely, the ECARE partners follow and comply with the ethical and confidentiality principles as set out in Articles 14 and 13 respectively of the GA. Furthermore, data controllers and processors are fully accountable for the data processing operations, in accordance to the General Data Protection Regulation 2016/679.

In this context, whilst taking into account the overall ethical dimensions of ECARE, a strict conformity to general GDPR rules is ensured in order to protect the personal data of the project partners, ESG members and third parties. Namely, in the frame of ECARE, several activities and tasks are addressed to third parties, such as the interviews of aeronautics players in the frame of WP3, the Workshop activities of WP3 and WP4, as well as the users' registration to the ECARE digital platform developed under WP5.

Consequently, ECARE involves humans and acquires, stores and processes personal data. These issues set out eventual ethical complications in line with the EU Data Protection and Privacy legal framework. Accordingly, the particular potential ethical issues raised in the frame of ECARE have been identified, as well as the relevant existing legal framework is prudently elaborated, observed, respected and followed. Subsequently, a reliable protocol has been established for ensuring that said ethical concerns are properly monitored, prevented and managed throughout the entire project lifespan. The concept of personal data is quite complex, and various definitions are available. For the purposes of this project, personal data is thought of as any information, private or professional, which relates to an identified or identifiable natural person. Finally, it is important to highlight that the information handled in the frame of ECARE is not considered as "sensitive", i.e. personal data relating to sensitive categories, such as race or ethnicity, religious or philosophical beliefs, political opinions, trade union membership, genetic data, biometric data or health information.

2.5 Legal framework

The overall relevant legal framework observed, applied and followed by the ECARE partners, throughout the entire development of the project, with regards to its ethical considerations has been identified early on in the project and its main principles are detailed below:

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 (General Data Protection Regulation) 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. The European Data Protection Regulation is applicable as of May 25th, 2018 in all member states to harmonize data privacy laws across Europe. This EU Regulation sets up a legal framework which aims to achieve a balance between a high-level protection for the privacy of individuals, and the free movement of personal data within the European Union. To meet such goal, the General Data Protection Regulation sets specific limitations to the collection and processing of personal data.

DEFINITIONS

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

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

PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

In accordance to the EU GDPR, Personal data shall be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’);
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’);
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’);
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

LAWFULNESS OF PROCESSING

Data Processing is only lawful if and to the extent that at least one of the following applies:

- The data subject has given consent to the processing of his or her personal data for one or more specific purposes;
- Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;
- Processing is necessary for compliance with a legal obligation to which the controller is subject;
- Processing is necessary in order to protect the vital interests of the data subject or of another natural person;
- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller;
- Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

CONDITIONS FOR CONSENT

1. Where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.
2. 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. Any part of such a declaration which constitutes an infringement of this Regulation shall not be binding.
3. 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.
4. When assessing whether consent is freely given, utmost account shall be taken of whether, inter alia, the performance of a contract, including the provision of a service, is conditional on consent to the processing of personal data that is not necessary for the performance of that contract.

RIGHTS OF THE DATA SUBJECT

There are eight (8) rights that belong to the person whose data are processed (data subject), namely:

- The right to be informed (the controller must provide the data subject from whom data are collected with certain information relating to himself/herself (the identity of the controller, the purposes of the processing, recipients of the data etc.);
- The right to access (every data subject should have the right to obtain from the controller);
- The right to object to the processing of data;
- The right to erasure and blocking;
- The right to rectify;
- The right to file a complaint;
- The right to damages; and
- The right to data portability.

2.6 ECARE ethics protocol

The rules and compliance to the ECARE ethical commitments and requirements, as outlined above, are continuously observed by the ECARE Project Coordinator (PC), Mr. Benjamin LOPEZ (Aerospace Valley), and the ECARE Data Protection Officer (DPO), Mrs. Irene PANTELAKI (EASN-TIS).

Precisely, in order to ensure that the personal data of the project partners and of third parties (including members of the ESG) are properly protected, the ECARE consortium has carefully examined the existing legal framework and has accordingly identified specific measures and protocols. It shall be noted that the guidelines described in the EC documents: “Research Ethics: A comprehensive strategy on how to minimize research misconduct and the potential misuse of research in EU funded research” and “How to complete your ethics self-assessment” have been prudently studied and considered by the ECARE partners. Specifically, the following measures have been identified and are followed, throughout the ECARE execution, including in the frame of the ECARE interviews, workshops/events, as well as in the context of the ECARE digital platform:

a) Transparency:

Upon registration to the ECARE digital platform, the user is informed of the platform’s data policies with regards to the acquisition, storing, processing and sharing; At any time, the user is able to request from the platform’s administrator full acknowledgement of where his/her personal data is being used/traced within the platform’s functionalities;

All third parties attending the ECARE workshops and events (past and upcoming ones), as well as all ECARE WP3 interviewees, are handed out a dedicated Information Sheet describing in detail the ECARE Privacy and Data Policy (included in Appendix A of the present document).

b) Consent:

All users of the ECARE digital platform, have to complete an official consent form, upon registration, accepting acknowledgement of the ECARE Privacy and Data Policy and granting access to the platform to use their (pre-specified) personal data;

The platform also requests consent from the user, before he/she attempts to retrieve information with regards to him/her by third party sources and this will only be realized upon the user’s granted permission;

The ECARE digital platform further informs and requests consent from the user, for using data which may also include information for third parties, to which the user is related;

An official Consent Form was also prepared and handed out for signature to the ECARE WP3 interviewees, as well as to the participants of the ECARE Transnational Workshop, informing them inter alia on the use (primary and secondary) and display of their personal data. Said consent form is provided to all third parties, together with the ECARE Information Sheet which describes the ECARE Privacy and Data Policy. Both the project’s dedicated Consent Form and Information Sheet are included in Appendix A of the present document.

c) Erasure of data:

The personal information of both the ECARE digital platform's users and of the ECARE events and activities' participants, will be maintained for no longer than is necessary for the purposes for which the data were collected, or for which they are further processed. User data will be erased when informed consent is withdrawn or upon cancelation of an account.

d) Sharing:

Data sharing and diffusion will only apply to the acquired data for which consent has been given, or the results arising from their process.

e) Security:

Appropriate protocols and certificates are used to ensure security of data.

No sensitive data are (nor will) be managed in the frame of the ECARE project.

Confidential data of the project partners are stored in a share folder provided by Aerospace Valley which is only accessible to the ECARE partners (password protected). Public data are available primarily via the ECARE public website and via own repositories of the project partners.

The ECARE official website (<https://ecare-project.eu/>) is the first reference point for public project-related dissemination and communication materials, documents, reports and resources. Open-access resources such as public deliverables, publications and presentations related to the project, are made accessible via the project website, under the "Dissemination" and "Deliverables" sections.

Consent forms will be kept beyond the duration of the ECARE project.

Additionally, for purposes of periodic payments and reimbursement of the costs of participation to ECARE workshops and events, participants provide their bank account information. In this regard, the relevant ECARE partner is bound to not divulge the above-mentioned information and to use it solely for reimbursement purposes.

Regarding Social Media, ECARE refers to the Terms and Conditions of the social media platforms in question.

Conclusion

The present document, forming the ECARE Data Management Plan, has been elaborated with the aim to provide a blueprint and general outline of the ECARE consortium's strategy and methodology for sound data management. It presented the main types and formats of data collected, processed, stored, shared, derived and produced within the project, as well as described how this data remain FAIR, as well as are effectively and properly managed, protected and maintained (including issues of storage, confidentiality, ownership, dissemination, open access and intellectual property rights), in line with the EU relevant standards and the signed ECARE Agreements (CA and GA).

In addition, this document identified the main ethical requirements, aspects and concerns raised in the frame of the ECARE project (i.e. personal data acquired during interviews, workshops, events, digital platform, etc.); as well as the relevant existing legal framework that is being observed and applied over the course of the project. Namely, the ECARE consortium ensures full compliance with the requirements of Regulation (EU) 2016/679 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). Lastly, a reliable protocol to prevent, monitor and properly manage the ethical issues related to the project has been identified and elaborated.

The ECARE DMP is treated as a living document and, since its original version created in Month 6 of the project (submitted as D1.3), it has been continually updated, refined and specified. It shall be stressed that since the submission of Version #1 of the ECARE DMP at the beginning of the project, no significant changes or unexpected issues occurred (such as for example, inclusion of unforeseen data sets, changes in the consortium policies, unexpected external factors, etc.). Therefore, no substantial revises had to be performed to the original ECARE data management methodology defined at the early stages of the project. The main amendments have to do with the amplification of the main types and formats of the data that ECARE has collected, stored, shared, derived and generated; as well as the elaboration of how said data follow the FAIR principles (i.e. are Findable, Accessible, Interoperable and Reusable), thus fostering the collaboration among researchers, encouraging knowledge sharing and enabling the re-usability of the project's valuable outcomes. Moreover, the present updated ECARE DMP version (M18), describes the actions performed towards meeting the ethical requirements of the project (in the frame of the WP3 Interviews, the ECARE workshops and the ECARE digital platform development). Said actions ensure a strict conformity to general GDPR rules in order to guarantee the protection of personal data of project partners and third parties.

3 References

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<https://eur-lex.europa.eu/eli/reg/2016/679/oj>
- [12] ECARE Consortium Agreement
- [13] ECARE Grant Agreement

Appendix A – ECARE information sheet and consent form

1. ECARE [État] Information sheet

Information sheet for the participants of ECARE [État] Nr. XXX

Date: [Date de publication]

Location: [Adresse société]

What the project ECARE is about:

ECARE is a Clean Aviation project which aims at clarifying the existing landscape of regional/national innovation roadmaps and funding opportunities for aeronautical stakeholders, as well as at creating complementarities and synergies between them to enable the European aeronautical industry to achieve the ambitious targets of the CA JU Programme while maximising public funding impact and efficiency. The ECARE project will develop and disseminate methodologies to create synergy mechanisms applicable to all EU aeronautical regions. These methodologies will be designed and tested in a Pilot involving four major regions of the European aeronautical industry, namely Occitanie and Nouvelle-Aquitaine in France, Hamburg in Germany and Campania in Italy. Over the course of the project, the methodologies will be improved, adapted and tested against the realities of these four regions, turning ECARE into a mature operational guidance project for CA JU and other European regions and countries. More information is available at <https://ecare-project.eu/>.

Target of the [État]: Will be defined in the final planning of the interview/workshop. (To be added by respective interviewer/event coordinator)

For additional information and questions please contact: info@ecare-project.eu

Data protection and right of withdrawal:

The data you provide may form a part of the input to ECARE documents, database and platform. The provided data will be stored and handled as long as strictly necessary for meeting the deliverables of ECARE. We would prefer that you agree to be mentioned as a participant in our documentation, however, at your request your name will be withheld from our reporting, and you will only be identified by a participant number.

You have the right to withdraw your consent at any time. In that case, please contact NAME. The

withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Retention of Data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Information sheet. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies. We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

Transfer of Data

Your information, including Personal Data, may be transferred to —and maintained on— computers located outside of your country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction. We will take all steps reasonably necessary to ensure that your data is treated securely and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

Email notifications

We want to communicate with you only if you want to hear from us. We try to keep emails to a minimum and give you the ability to opt in to specific topics that interest you. We will send you email related to your activities. You may at any time select to receive certain email communications, in accordance with your preferences, and from which you may opt out at any time by informing us.

Security of Data

The security of your data is important to us but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

Legal Basis for Processing Personal Data Under General Data Protection Regulation (GDPR)

If you are from the European Economic Area (EEA), the ECARE Consortium legal basis for collecting and using the personal information described in this Information sheet depends on the Personal Data we collect and the specific context in which we collect it. The ECARE Consortium may process your Personal

Data because:

- We need to perform a cooperation agreement with you;
- You have given us permission to do so;
- You have registered to our events/activities;
- The processing is in our legitimate interests and it's not overridden by your rights;
- To comply with the law.

Your Data Protection Rights Under General Data Protection Regulation (GDPR)

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. The ECARE Consortium aims to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data. If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

In certain circumstances, you have the following data protection rights:

- The right to access, update or to delete the information we have on you;
- The right of rectification. You have the right to have your information rectified if that information is inaccurate or incomplete;
- The right to object. You have the right to object to our processing of your Personal Data;
- The right of restriction. You have the right to request that we restrict the processing of your personal information;
- The right to data portability. You have the right to be provided with a copy of your Personal Data in a structured, machine-readable and commonly used format;
- The right to withdraw consent. You also have the right to withdraw your consent at any time where ECARE Consortium relied on your consent to process your personal information.

Please note that we may ask you to verify your identity before responding to such requests.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

Contact Information

First and last name of the interviewer: NAME

Email of the interviewer: [Courrier société]

2. ECARE workshop/interview Consent Form

Consent Form

ECARE [État] Nr. **XXX**

Date: [Date de publication]

Location: [Adresse société]

With my signature, I confirm the following points:

- I agree to taking part in the [État], and – as far this is applicable – I declare that my employer or contractor agrees with my participation.
- I understand that the participation in this [État] is voluntary.
- I understand that I am free to decline to participate in this [État], or I may withdraw my participation at any point without penalty. My decision whether or not to participate in this workshop will have no negative impacts on me either personally or professionally.
- I hereby declare that I have read and understand the [État] **Information Sheet** of the ECARE Consortium.
- I agree that photos taken during the [État] and on which I can possibly be seen may be published (free of charge) by the ECARE consortium. My name will not be mentioned without my explicit consent. The images may be used for the following purposes:
 - o Publication on ECARE website
 - o Use on the ECARE social media platforms (e.g., LinkedIn, Twitter)
 - o Press releases, newsletters and other similar dissemination material in physical or digital media
- I agree that the information, ideas and suggestions produced during the [État] can be used in the project ECARE. If the data I provide are to be used in documents or publications or are disclosed in any other manner, then they will be made completely anonymous, unless I agree to be named in these documents or publications. If I request further information about the project, now or in the future, I may contact **NAME** - [Courrier société].

I consent that my name can be mentioned in documents and dissemination material of ECARE as participant in this workshop. **Yes** **No**

Privacy statement

I allow my name and affiliation to be recorded in the interviewer's/workshop coordinator's own documentation, and I allow my name and affiliation to be mentioned in internal documentation.

Yes No

Date

Name of participant

Participant's signature