

6.2

Ethical issues Report

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The information and views set out in this report are those of the author(s) and do not necessarily reflect the official opinion of the European Union. Neither the European Union institutions and bodies nor any person acting on their behalf.

Table of Abbreviations and Acronyms

Abbreviation	Meaning
AB	Advisory Board
CTA	Call-to-Action
DPO	Data Protection Officer
GA	Grant Agreement
GDPR	General Data Protection Regulation
MoE	Ministries of Education
TEU	Treaty of European Union
TFEU	Treaty on the Functioning of the European Union
WP	Work Package

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1. Introduction

The present deliverable entitled “Ethical issues Report” has been developed as part of the GenB project that is funded by the European Union’s Horizon Europe Research and Innovation Programme under Grant Agreement No 101060501.

This document aims to provide detailed information on the adequate technical and organisational measures that GenB Consortium puts in place to guarantee the respect of the fundamental rights and freedom of people involved in the project (such as young people, parents, teachers, formal and non-formal education professionals and Advisory Board members). The deliverable is focused on safeguarding rights related to personal data protection. Young people are the target of GenB project and will be actively involved in co-creation activities, capacity building workshops etc. (as per Grant Agreement-GA). Therefore, it is of utter importance to guarantee the protection of their personal data according to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation-GDPR)¹. The holder of parental responsibility's consent is always collected in advance according to the principles stated in Art. 5 of GDPR. Also, many societal actors (such as teachers, informal-education providers, multipliers, parents) will be actively involved in the GenB activities, co-creating educational instruments and materials for the purpose of the project. Hence, seeking their explicit consent to use their data, images and created materials is an integral part of this process.

To this end, the present document defines the data processing rights for participants involved in GenB activities and website users, describes data processing procedures used by the consortium (Chapter 3), and as well as the informed consent templates that will be used during project execution in line with the GDPR. Moreover, the Beneficiaries adhere to the national legislation to protect the personal data rights and to confirm compliance with EU and national data protection rules. Each GenB Beneficiary signed a ‘**Declaration on Horizon Europe Ethical Standards and Data protection**’ (Appendix 7.4).

Contact details about the **Beneficiaries’ Data Protection Officers (DPO) or persons responsible for the application of personal data protection** rules are indicated in Appendix 7.5 of this deliverable in line with the GDPR.

Finally, this report provides details about the gender equality policies that the GenB Consortium applies in the implementation of the project, including in the involvement of AB Members and recruitment of GenB Ambassadors.

The deliverable will be updated during the project's life, if needed, due to project progress or legislation changes at international, European and national level.

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

2 Legal basis for ethical research in GenB

The ethical framework, on which the Grant Agreement of GenB is based, raises from the Horizon Europe Programme, which is set up on the Treaty of European Union (TEU)², Treaty on the Functioning of the European Union (TFEU)³ and Treaty of Lisbon⁴. In particular, the former law claims “[...] *respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail.*” (Art. 2 – TEU).

On the other hand, the TFEU establishes the fundamental freedoms to exercise in the areas under European Union’s competence. In line with the project framework, Article 16 recognises the right to the protection of personal data and the European Parliament and Council’s competence to define “[...] *the rules relating to the protection of individuals with regard to the processing of personal data by Union institutions, bodies, offices and agencies, and by the Member States when carrying out activities which fall within the scope of Union law, and the rules relating to the free movement of such data [...]*”. Consequently, at the European level, the principal law to respect is the General Data Protection Regulation (GDPR).

Finally, Article 6 of the Treaty of Lisbon, makes a reference to the Charter of Fundamental Rights of the European Union⁵ which also recognises the right of integrity, respect for private and family life, protection of personal data (which restricts the processing of personal data “[...] *for specified purposes and on the basis of the consent of the person concerned or some other legitimate basis laid down by law [...]*”, according to Article 8 - Charter of Fundamental Rights of the European Union) and freedom of expression and information as well as freedom of the arts and sciences.

Article 19 of the Horizon Europe Regulation⁶ disciplines the ethical rules for the participation and dissemination of the Actions implemented under the Programme. In particular, the provision reaffirms that the Actions should be in compliance with national, European Union and international laws, including the Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Supplementary Protocols. Moreover, “[...] *particular attention shall be paid to the principle of proportionality, to the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of a person, the right to non-discrimination and to the need to ensure protection of the environment and high levels of human health protection [...]*”.

² https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_1&format=PDF

³ <https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12012E/TXT:en:PDF>

⁴ <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A12007L%2FTXT>

⁵ https://www.europarl.europa.eu/charter/pdf/text_en.pdf

⁶ <https://eur-lex.europa.eu/eli/reg/2021/695/oj>

The Ethics Summary Report has already recognised the competences of GenB Beneficiaries' to deal with ethical issues adequately. Consequently, the GenB Partners will adhere to the Horizon Europe principles and GDPR provisions together with the national acts. In addition to GDPR, GenB Beneficiaries guarantee the respect of EU values with focus on the Gender mainstreaming as stated in Art. 14 and Annex V of GA.

GenB also commits to recognise equal opportunities to men and women in implementation of project tasks. The general approach affirms the balanced participation of female and male stakeholders in the project activities as explained in Chapter 5.

3. GenB privacy policies

Operations on stakeholders' personal data such as collection, recording, organisation, storage, are central in the implementation of GenB activities.

The general approach is based on two types of data processing:

- Data processing of personal data related to participants in GenB activities
- Data processing of personal data for website operations

APRE and LOBA have recognized their roles as autonomous Data controllers in participatory activities (APRE) and website operations (LOBA). The data under APRE or LOBA's responsibility will be shared in specific cases and only for strictly necessary purposes.

For the GenB activities, APRE has defined different purposes and measures for adults and children's data processing (Appendix 7.1 and 7.2).

3.1 Data collection, processing, storage, protection, retention and destruction for GenB Activities

All participants in GenB activities are identified or recruited through different channels such as: social media ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#) and [YouTube](#)), National open Calls for GenB Ambassadors, individual e-mails to networks, partner's internal channels (i.e. newsletters, mailing lists etc.).

The data will be collected primarily during the following Tasks:

- **Task 1.3 Co-creation of the awareness, information and education innovative approaches** (recruitment of participants (youngsters, students, teachers, education policy makers and regional authorities, school managers, and other multipliers such as museums, science communicators, youth organisations, community groups,) for Common Ground Camp, 3 Focus Groups and Living Labs in AT, IT, and SK);
- **WP2 activities related to inspire, inform and educate the GenB Target groups**, (Hands-on for pre/early students, teachers and multipliers, Bioeconomy careers infodays for secondary schools, Bioeconomy talks/seminars" inquiry-based learning to stimulate students' reflection and debate, MOOC to equip the teachers with competences in training their students in bioeconomy, etc.);
- **WP3 activities related to Engage, Empower & Take a role for GenB Ambassadors**, (Calls to recruit Young GenB Ambassadors, social media pages for the #GenBAmbassadors community, Networking and good practices exchange, participation in GenB International Competition "GenB driving the transition", thematic online debates on topics relevant for young people etc.);
- **Task 4.3 Ministries of Education policy recommendation**, (Ministries of Education MoE (online) workshop and Ministries of Education (online) recommendations workshop);
- **Task 5.2 Ecosystem building** (clustering with other projects and initiatives)
- **Task 6.1 Project Management** (organization of Consortium Meeting together with project events and involvement of AB Members)

- **Task 6.2 Data Management Plan and Ethics** (establishment of data protection procedures, definition of Data Processor Agreement etc.).

Data collection and data protection rights

The achievement of GenB objectives requires the involvement of adults and children. Consequently, legal basis of data processing will be the Article 6.1.a GDPR requiring the consent to the data subject before any action on the data.

In circumstances where informed consent cannot be filled-in online (large-scale events or public events), GenB beneficiaries will collect the hard document signed and will store it in their facilities considering their privacy policy (Appendix 7.1).

All participation will be voluntary and informed. The adults and the holder of parental responsibility are fully able and capable to provide explicit, written, freely given, specific and informed consent to take part in any GenB activity and to sign the informed consent before it occurs.

In particular, the GenB Consortium requires the consent of adults to process the child's name, surname, e-mail, age, gender, Country, image, audio, level of education, work or educational institution; job position, personal website/blog/social media, first and second language spoken.

In the case of children's data processing, the holders of parental responsibility are given consent to process name, surname, age, picture, and audio (Appendix 7.2).

For major protection of the child's privacy, on social media content publication and in project publications their surname will be not shared. In case of online registration forms, further personal data may be collected (in optional form), which will only be used for internal research purposes and not published.

Before taking part in the project activities, the Partners will provide participants transparent and easily understandable information about the project, the purpose of the GenB activity, and the privacy procedures as explained in the Privacy Policy.

All privacy policy documentation have been translated in Partners' native language and available in English, Italian, Dutch, Greek, Portuguese, Slovak, and Spanish ([link](#)) on the project website and written with terminology each individual participant is comfortable with. Participants for whom this cannot be assured do not take part in the GenB activities.

In exceptional cases, GenB partners will participate in public events to implement tasks under their responsibility. As a result, data will be processed according to Article 6.1.e.

Storage, protection, retention, and destruction

Data shall be safely stored at APRE's SharePoint, access of which is only restricted to GenB team members, for as long as required by the purpose they have been collected for and not longer than the duration of GenB project. Personal data of participants are only shared with GenB Partners' staff and prior to participants' consent.

Once the retention period expires, Personal Data shall be deleted. Therefore, the right to access, the right to erasure, the right to rectification and the right to data portability cannot be enforced after the expiration of the retention period (end of the project).

Moreover, APRE has designed a Database of public personal data where the GenB Partners can store public contacts to implement the Work Package (WP) 3 Activities, specifically enabling the identification of suitable GenB Ambassadors to be contacted and recruited in the WP3 planned activities. This approach will be maintained for the project life to prevent personal data breaches according to the Art 32 of GDPR.

In relation to the data whose consent is given, the adult/holder of parental responsibility has the power to exercise the rights set out in Articles 15 to 21 under the GDPR.

All participants/parent is made aware of their right to withdraw from the GenB activities without providing any reason for their withdrawal. On the other hand, the privacy policy for GenB activities informs the data subject that the data cannot be removed from documents that have already been published or is in the process of being published.

3.2 Participants recruitment procedures for GenB Website

Objectives

Participants' recruitment procedures through the GenB website may have the objective of recruiting newsletter subscribers or potential GenB Amabassadors.

Channels

Where and when applicable, a Call-to-Action (CTA) prominently displayed on project website may be used in the website homepage. The CTA may include a widget redirecting to the respective web page.

Data collection

Personal data collected includes participants' Name; Surname; Organisation; Email address.

Tools

Users' data will be collected via two forms: Newsletter subscription form and Contact form. Both these forms will explicitly require consent to process personal data in accordance with GDPR and privacy policies established in GenB.

Consent and Privacy

Both Newsletter and Contact forms include a checkbox which users should actively check to indicate their consent and redirecting to GenB Privacy Policy which in turn, provides also information on consent withdrawal.

Data storage

LOBA has available a data centre. The whole structure is located in a carrier-neutral building, located in Lisbon, offering all the conditions for the development and delivery of colocation and disaster recovery services. This data centre has all the state-of-the-art technologies in terms of security, environment control and HVAC and continuous energy.

4. Informed Consent Procedures

4.1 Informed consent procedures for GenB Activities

Informed consent will be sought for all activities, after informing the participants through the project privacy policy and signing a written consent form (if the consent is given during the project event) or filling in a digital form sent out to participants.

The written project information sheet provides details about the project activities, data collected, participant rights, and contact details. The consent form must be given by a competent individual who has received the necessary information; who has adequately understood the information; and who, after considering the information, has arrived at a decision without having been subjected to coercion, undue influence or inducement, or intimidation. All obtained consents will be freely given; no pressure will be put on participants to participate in the project. All participants will be given the opportunity to ask questions and receive clear answers before making decisions about their participation.

4.2 Informed consent procedures for Website

Informed consent procedures of GenB website are related to Newsletter and Contact forms and include:

- Clear purpose: users are clearly provided with information as to why they should fill out the forms (to contact the project or to subscribe to project's newsletter)
- Data collected: personal data collected include Name; Surname; Organisation; Email address
- Consent statement: the forms include a checkbox which users should actively check to indicate their consent
- Link to Privacy Policy: each checkbox provides a link redirecting to GenB Privacy Policy which in turn, provides also information on:
 - Consent withdrawal
 - Legal basis of the processing
 - Recipient subjects to whom the data may be communicated
 - Period of retention of data
 - Rights of the data subject
 - Data Protection Officer and contacts

5. Gender Mainstreaming

According to the Art.14 and Annex V of GA, gender equality is a fundamental value of GenB project. Gender equality benefits the quality and relevance of project results, attracting the society as whole, retaining more talent, and ensuring that everyone can maximise their potential. The Consortium will incorporate sex and gender analysis into the Task 3.1 “Engage GenB Ambassadors”, WP6 “Project management” activities (that include the AB Member selection) and any other project activity in which participants will be actively selected to ensure that the sex and gender dimensions are properly taken into account thereby removing potential barriers to adoption and take-up.

The studies conducted by the UNESCO Chair on Gender Equality Policies in Science, Technology and Innovation⁷ about the women participation in STEM are taken into account to communicate, disseminate and exploit results (e.g., documents, Calls for Ambassadors, deliverables) that do not contain any assumptions or biases with regard to sex and/or gender. Moreover, the GenB Partners pay attention to use a gender neutral language in the implementation of any activity and related documentation. Finally, according to the Annex 5 of GA, the Partners of the GenB consortium recognise equal opportunity to their staff, actively working towards a better gender balance, flexibility of the workforce and benefits for all working parents.

⁷ <https://www.unesco.org/en/gender-equality/chairs>

6. Conclusions

The purpose of this deliverable is to recognise the ethical principles applied to GenB project and define the procedures, and tools which GenB adopt to respect the relative international, European and national ethical law.

The deliverable is the result of an analysis which began during the proposal stage, when the Consortium estimated that the main commitment will concern the target audiences' data protection, not forgetting the other ethical issues.

The report is revised and updated annually, if necessary, by the General Assembly.

7. Appendix

7.1 Privacy policy and informed consent for GenB Activities for adult

PRIVACY POLICY IN ACCORDANCE WITH ARTICLE 13 OF THE REGULATION

GENERAL DATA PROTECTION REGULATION

This information is addressed to people interested in supporting the implementation of "GenB - Informing and educating young people on more sustainable behaviours and choices to build a future Generation informed and interested in Bioeconomy" (G.A. 101060501), funded by the Horizon Europe Programme and coordinated by APRE.

Description of the project

Young generations are the key drivers of sustainable development, which is why it is important to prepare young people for their role in the circular and sustainable bio-economy. In this context, the GenB project will involve young people with the overall objective of inspiring and encouraging future generations to demonstrate awareness, sensitivity, and interest in environmental issues, sustainability, and circularity. In cooperation with young people, parents, and teachers, GenB will produce educational toolkits focusing on the bio-economy and bio-sectors. In order to maximise the impacts of the project, GenB will involve all citizens, create synergies with other initiatives and consolidate its educational model.

Description of the activities

Within the GenB project, the partners organise various activities to accompany the new generation in the transition towards a circular and sustainable bio-economy: (a) a number of meetings to co-create new approaches and educational materials; (b) promotional meetings as part of large events to raise awareness among the general public; (c) training meetings to increase knowledge on bioeconomy issues; (d) activities with young Ambassadors to promote the bioeconomy; (e) creation of ad-hoc content (images, videos and texts) for social media ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#) and [YouTube](#)), website and other dissemination materials of the project; (f) creation of educational materials (toolkits, MOOCs, videos, educational fact sheets, etc.) for young people, teachers and other multipliers working with the younger generation (g) activities to exchange good practices among the educational community.

Moreover, pictures will be taken, short videos will be recorded and personal information will be requested from the participants to involve them in the GenB activities.

The images, videos, and personal information will be used for dissemination and documentation purposes of the activities carried out by the GenB project, in documents, conference presentations, and scientific publications. Furthermore, in order to promote project activities, communicate specific content on the bioeconomy, and encourage the active involvement of young people as 'voices' of change, images and videos will be shared on the project's social media and website.

Under no circumstances will the images, videos, and texts collected harm the dignity and decorum of the persons concerned. Furthermore, all materials will not be used for commercial purposes by the GenB project. Please note that the contents, once published and disseminated, may be subject to acquisition and republication by third parties, even without GenB's consent.

To collect and publish the personal data of subjects who participate in the project activities, the data subject's consent is required to process the personal data according to Art.13 GDPR.

Type of data processed

Personal data will be collected and stored on the project website (when you subscribe to the GenB newsletter) or at one of the GenB beneficiaries' premises (legal address) if you attend one of the events organised by the project. Data processed include first name, surname, e-mail, age, gender, Country, image, audio, level of education, work or educational institution; job position, personal website/blog/social media, first and second language spoken.

Purposes of processing

The data subject's personal data will be collected and used within the GenB project for the following purposes:

- Dissemination of images and videos on the GenB project's social media channels;
- Production of project publications, news, documents, and conference presentations;
- Creation of a Database for carrying out activities with young Ambassadors for the promotion of the bio-economy
- Storage of the multimedia material and data collected at the APRE Sharepoint (apre.sharepoint/genbconsortium) and at the facility of the partner organising the activity.
- Participation in GenB initiatives to increase knowledge on bioeconomy issues
- Administration by APRE of requests for information, complaints or disputes

Data Controller

The Controller is:

APRE – Agenzia per la Promozione della Ricerca Europea,
via Cavour 71 – 00184 Rome – Italy
e-mail privacy@apre.it
Tel +39 6 48939993

Legal basis for processing personal data

For the above purposes, the legal basis of the processing is the consent of the data subject to the processing of his or her personal data [art. 6.1.a GDPR].

Data Subject Rights

In relation to his or her personal data, the data subject has the power to exercise the rights set out in Articles 15 to 21 under the GDPR.

In addition, the data subject has the right to withdraw his or her consent at any time. In this case, APRE shall remove the personal data of the data subject from the place where it was published as soon as possible.

Please note that it may be impossible to remove the personal data of the person concerned if they have already been included in a document that has already been published or is currently being published. Data and images will only be removed from future publications.

In addition, in the event that the right of revocation is exercised, APRE will remove the data subject's data from the SharePoint where it is stored.

The above rights may be exercised in writing by sending an email to privacy@apre.it, specifying the name of the data subject and the 'GenB' project.

The data subject also has the right to lodge a complaint with “Garante per la Protezione dei dati personali”.

Data storage and retention

All personal data collected will be stored in a safe place at the APRE Sharepoint. Only employees of APRE and the Partners, BTG, LOBA, PEDAL, EUN, ZSI, AIJU, Q-PLAN, FVA and HSPN, will have access to this information (<https://www.genb-project.eu/about/consortium/>).

If the data subject does not exercise the right of withdrawal, the data will be kept in the Project Database for the time required by the purpose for which they were processed, and in any case no longer than the duration of the GenB project (30 April 2025).

This is without prejudice to any longer retention periods where required by legal obligations.

Data dissemination outside GenB

The personal data of the data subject may be accessible to the staff of the IT system on behalf of APRE. Each GenB beneficiary is subject to the application of the EU Regulation 679/2016 (GDPR) and its own ethical rules, taking into account national legislation. APRE will provide further information on the Partners' data protection policy if requested by the data subject.

Specifically, requests by data subjects to exercise their data protection rights will be handled in a coordinated manner through the e-mail address privacy@apre.it, which will be identified as the contact point in the data protection information provided to them by each Party.

Moreover, the data could be shared and used for other EU projects that may benefit from them after pseudonymization or anonymization and in accordance with the purpose of the consent given (Art. 25 of GDPR).

Transfer of data outside the European Union

The data will not be transferred outside the European Union.

Changes and updates

APRE may also make changes and/or additions to this privacy policy as a result of regulatory changes. Accordingly, the data Controller suggests that you frequently read this privacy policy on the project website.

Data Breach

In the case of a personal data breach, the event will be handled in accordance with Articles 33-34 of the GDPR EU 2016/679 and all necessary measures will be taken to minimise any negative consequences.

CONSENT TO THE PROCESSING OF PERSONAL DATA

I, the undersigned _____

declare that:

- That I have read and understood the declaration provided by the Data Controller pursuant to Article 13 of the GDPR;
- That I have had the opportunity to ask questions and have received satisfactory answers;
- That I am aware that my participation is voluntary and that I am free to withdraw at any time without providing a reason and without consequences;
- That I have received information on the expected duration of data retention (not exceeding the duration of the project, 20 April 2025)
- That I am aware that this information will be treated in strict confidence and managed in accordance with the provisions of the EU General Data Protection Regulation (Reg. 2016/679).

And I consent

to the processing of my personal data by APRE within the limits of the purposes set out in the information.

Data subject's signature

Date

7.2 Privacy policy and informed consent for GenB Activities for children

PRIVACY POLICY IN ACCORDANCE WITH ARTICLE 13 OF THE REGULATION

GENERAL DATA PROTECTION REGULATION

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Description of the project

Young generations are the key drivers of sustainable development, which is why it is important to prepare young people for their role in the circular and sustainable bio-economy. In this context, the GenB project will involve young people with the overall objective of inspiring and encouraging future generations to demonstrate awareness, sensitivity, and interest in environmental issues, sustainability, and circularity. In cooperation with young people, parents, and teachers, GenB will produce educational toolkits focusing on the bio-economy and bio-sectors. In order to maximise the impacts of the project, GenB will involve all citizens, create synergies with other initiatives and consolidate its educational model.

Description of the activities

Within the GenB project, the partners organise various activities to accompany the new generation in the transition towards a circular and sustainable bio-economy: (a) a number of meetings to co-create new approaches and educational materials; (b) promotional meetings as part of large events to raise awareness among the general public; (c) training meetings to increase knowledge with respect to bioeconomy issues; (d) activities with young ambassadors to promote the bioeconomy; and (e) creation of ad-hoc content (images, videos and texts) for project-related social media and the GenB project website.

In the context of these activities, pictures will be taken and short videos will be recorded.

The pictures and videos will be used for dissemination and documentation purposes of the GenB project activities, in documents, conference presentations, and scientific publications. Furthermore, to promote project activities, communicate specific content on the bioeconomy, and encourage the active involvement of young people as "voices" of change, the images and videos will be shared on social media ([Instagram](#), [Facebook](#), [Twitter](#), [LinkedIn](#), and [YouTube](#)) and on the GenB project website. Under no circumstances will the collected images, videos and texts harm the dignity and decorum of the persons concerned. Furthermore, all materials will not be used for commercial purposes by the GenB project. Please note that the contents, once published and disseminated, may be subject to acquisition and republication by third parties, even without GenB's consent. In order to collect and publish images of the child, the consent of both parents/guardians is required for the processing of the child's personal data.

Type of data processed

As the holder of parental responsibility over the child involved in the GenB project activities, the parent/guardian gives consent to the processing of the following data of the child: name, surname, age, picture and audio.

For greater protection of the child's privacy, only the following personal data of the child will be used on social media and in project publications: name, age, image and audio.

In the case of online registration forms, further personal data may be collected (in optional form), which will only be used for internal research purposes and not published.

Furthermore, in the consent form, the parent provides authorisation for the processing of his/her name and surname.

Purposes of processing

The child's personal data will be collected and used within the GenB project for the following purposes:

- Dissemination of images and videos on the GenB project's social media channels;
- Production of project publications, news, documents and conference presentations;
- Storage of the multimedia material and data collected at the APRE Sharepoint (apre.sharepoint/genbconsortium) and at the facility of the partner organising the activity.

In addition, GenB requests consent to process the personal data of the parent/guardian for the following purposes:

- Storage of the data collected at the structure of the partner organising the activity.
- Administration by APRE of requests for information, complaints or disputes.

Data Controller

APRE – Agenzia per la Promozione della Ricerca Europea,
via Cavour 71 – 00184 Rome – Italy
e-mail privacy@apre.it
Tel +39 6 48939993

Legal basis for processing personal data

For the above purposes, the legal basis of the processing is the consent given by the parent to the processing of the child's personal data and his/her own data [Article 6.1.a].

Holder of parental responsibility over the child's rights

In relation to the personal data of the parent/guardian and those of the child, the data subject has the power to exercise the rights set out in Articles 15 to 21 under the GDPR.

In addition, the data subject has the right to withdraw their consent at any time. In this case, APRE will remove the child's personal data from the place where it was published as soon as possible.

Please note that it may be impossible to remove the child's personal data if they have already been included in a document that has already been published or is in the process of being published. Data and images will only be removed from future publications.

Furthermore, if the right of withdrawal is exercised, APRE will remove the child's data and those of the parent/guardian from the SharePoint where they are stored.

The above rights can be exercised in writing by sending an email to privacy@apre.it, specifying the name of the child and the GenB project.

The holder of parental responsibility also has the right to lodge a complaint with the *Garante per la protezione dei dati personali*.

Data storage and retention

All personal data collected will be stored in a safe place at the APRE Sharepoint. Only employees of APRE and the Partners, BTG, LOBA, PEDAL, EUN, ZSI, AIJU, Q-PLAN, FVA and HSPN, will have access to this information (<https://www.genb-project.eu/about/consortium/>).

If the holder of parental responsibility over the child does not exercise his or her right of withdrawal, the data will be retained in the Project Database for the time required by the purpose for which it was processed, and in any case no longer than the duration of the GenB project (30 April 2025).

This is without prejudice to any longer retention periods where required by legal obligations.

Data dissemination outside GenB

Your personal data and that of the child may be accessed by IT system staff on behalf of APRE. Each GenB beneficiary is subject to the application of the EU Regulation 679/2016 (GDPR) and its own ethical rules, taking into account national legislation. APRE will provide further information on the Partners' data protection policy if requested by the holder of parental responsibility over the child. Specifically, requests from the holder of parental responsibility over the child to exercise their data protection rights will be handled in a coordinated manner through the email address privacy@apre.it which will be identified as the contact point for the holder of parental responsibility over the child in the data protection information provided to them by each Party.

Transfer of data outside the European Union

Your Data will not be transferred outside the European Union.

Changes and updates

APRE may also make changes and/or additions to this privacy policy as a result of regulatory changes. Accordingly, the data Controller suggests that you frequently read this privacy policy on the project website.

Data Breach



In the case of a personal data breach, the event will be handled in accordance with Articles 33-34 of the GDPR EU 2016/679 and all necessary measures will be taken to minimise any negative consequences.

CONSENT TO THE PROCESSING OF PERSONAL DATA

I, the undersigned _____ parent/guardian

I, the undersigned _____ parent/guardian

of _____

declare that:

- I have read and understood the declaration provided by the Data Controller pursuant to Article 13 of the GDPR;
- I have had the opportunity to ask questions and have received satisfactory answers;
- I am aware that my participation is voluntary and that I am free to withdraw at any time without providing a reason and without consequences;
- I have received information on the expected duration of data retention (not exceeding the duration of the project, 20 April 2025)
- I am aware that this information will be treated in strict confidence and managed in accordance with the provisions of the EU General Data Protection Regulation (Reg. 2016/679).

And I consent

- To the processing of children’s personal data from APRE within the limits of the purposes set out in the privacy policy
- To the processing of my personal data from APRE within the limits of the purposes set out in the privacy policy

Signature parent

Signature parent

Date

7.3 Privacy policy for Website

GENB WEBSITE PRIVACY POLICY

1. Who is responsible for the processing of your personal data?

1.1 Your personal data is processed by GenB (Data Controller).

1.2 GenB the right to modify or amend this Privacy Policy at any time. Such modifications and alterations shall be communicated through our website.

1.3 If you have any questions or comments you can contact us by email: info@genb-project.eu

2. What categories of personal data do we process?

2.1 When you fill out the contact form on our website, or contact us via e-mail, telephone or social networks, GenB collects:

the basic identity information you provide, such as name, e-mail address, address, telephone number;

the content of your communication and the technical details of the communication itself;

preferences regarding the reception of e-mail communications, advertisements;

3. For what purpose do we process your personal data?

3.1 GenB processes your personal data in order to provide you, in a personalized and efficient way, the information, products and/or services you request through our website, e-mail, telephone, fax, social networks or in fairs and events.

3.2 GenB processes your personal data to provide the services you have requested to GenB.

3.3 GenB processes your personal data to perform statistical analysis so that we can improve our website, our products and services or develop new products and services.

3.4 GenB processes your personal data to comply with legal obligations or to meet any reasonable request from competent agents or representatives of the law, judicial authorities, agencies or government bodies, including competent data protection authorities. Your personal data may be transferred at GenB's own initiative to the police or any judicial authorities as evidence or if there is justified suspicion of an illegal act or crime committed by you through your registration or use of the website, social networks or other communication with us.

3.5 GenB may process your personal data to preserve the legitimate interests of GenB, of its partners or third parties, if and when your registration or use of the Website, social networks or other communication channels can be considered (a) a violation of any applicable terms of use or intellectual property rights or any other rights of third parties, (b) a threat to the security or integrity of the Website, (c) a danger to the Website or any of the underlying Systems of I-CHARGING Mobilidade Elétrica, S. A. or its subcontractors due to viruses, Trojan

horses, spyware, malware or any other form of malicious code, or (d) in any way hateful, obscene, discriminatory, racist, slanderous, malicious or otherwise inappropriate or illegal.

3.6 GenB will only send communications, promotions, offers, newsletters and other announcements by e-mail or other electronic communication channels if the communication has been requested by you.

4. Why is our processing of your personal data legitimate?

4.1 We process your personal data based upon your free and informed consent for the purpose of providing, in a personalized and efficient way, the information, products and/or services you requested through our website, e-mail, telephone, fax, social networks or at fairs and events;

4.2 We process your data for the fulfilment of legal obligations;

4.3 We process your data whenever it is necessary for the execution of a contract to which the data subject is a party, or for pre-contractual operations requested by the data subject;

4.4 We will process your personal data whenever said processing is necessary to fulfil GenB legitimate interests, such as:

communicate your personal data to our partners in order to provide adequate information;

to enable us to defend ourselves in legal proceedings;

to implement continuous improvements to our website, social networking channels, products and services – to ensure you have the best possible experience;

to keep our website, social networks and products and services protected from misuse and illegal activities;

5. What security and confidentiality measures we have implemented to safeguard for your data?

5.1 GenB only processes the data that is necessary to achieve the purposes listed in this policy.

5.2 Your personal data will only be processed for as long as it is necessary for the purposes listed above or until you withdraw your consent to the processing (when such option is applicable).

GenB will anonymize your personal data when it is no longer necessary for the purposes described in the purpose of the treatment, unless there is a legal or regulatory obligation or a judicial or administrative order preventing GenB from doing so.

5.3 GenB applies all technical and organizational measures to ensure a level of security appropriate to the risk of each treatment.

5.4 GenB will only transmit your personal data to third parties when necessary for the provision of services and such transmission will always be subject to strict contractual obligations of third parties and confidentiality.

6. What are your rights?

6.1 You have the right to request access to all your personal data processed by GenB.

6.2 You have the right to request the rectification of inaccurate personal data free of charge.

6.3 You have the right to withdraw your consent at any time, without compromising the lawfulness of the processing carried out based on the consent previously given to process your personal data.

6.4 You have the right to request the erasure of your personal data, however, it must be borne in mind that a request for deletion will be evaluated by GenB in compliance with legal or regulatory obligations or administrative or judicial orders that may contradict such deletion.

6.5 You have the right to request GenB to restrict the processing of your personal data if and when: (a) you claim the inaccuracy of such data, (b) the processing is illegitimate or (c) the data is no longer necessary for the purpose described above, but still needed for legal proceedings.

6.6 You have the right to oppose to the processing of personal data if you can prove that there are serious and justified reasons to such opposition.

6.7 GenB reserves the right to charge an administrative fee for several subsequent access requests that are clearly submitted to cause inconvenience or harm to I-CHARGING Mobilidade Elétrica, S.A.

7. How to exercise your rights?

7.1 To exercise one or more of the above rights, you can send us an e-mail to info@genb-project.eu

7.2 The data protection authority in Portugal for the exercise of your rights in this matter, namely complaints, is the National Commission for Personal Data Protection (Comissão Nacional de Proteção de Dados Pessoais, in Portuguese). For more information, visit <https://www.cnpd.pt>.

7.4 Declarations on horizon europe ethical standards and data protection

Beneficiary 1: APRE



Rome, 16/06/2023

Declaration concerning data processing protection
grant agreement No 101060501

I, the undersigned, representing the APRE hereby confirm that APRE :

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- hereby confirm that APRE does not designate a Data Protection Officer because none of the criteria in Art. 37 sub. 1 of the General Data Protection Regulation (GDPR) are met in the case of APRE. APRE is neither a public authority nor carries out such activities where a Data Protection Officer would be required. APRE defined an internal regulation for data management and protection, and included a privacy team in its organization chart coordinated by Renato Fa and Flavia Fusconi mail: privacy@apre.it

Marco Falzetti
Director

Beneficiary 2: BTG



BTG Biomass Technology Group BV
 P.O. Box 835
 NL-7500 AW Enschede
 The Netherlands
 Tel +31 53 486 1186
 E-mail: office@btgworld.com
 Site: www.btgworld.com

**Declaration concerning data processing protection
 Grant Agreement no. 101060501**

“GenB - Informing and educating young people on more sustainable behaviours and choices to build a future Generation informed and interested in Bioeconomy”

I, the undersigned, representing **BTG Biomass Technology Group BV** (hereafter: BTG) hereby confirm that BTG:

- applies ethical principles and guidelines of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.
- applies data protection rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA Relevance).
- has defined an internal regulation for data management and protection and included a privacy team in its organization chart coordinated by Brenda Kooij, kooij@btgworld.com.

Place Enschede (The Netherlands)
 Date 27 June 2023
 Name Douwe van den Berg
 Title Head of Consultancy & Project Development

Signature

BTG Stamp



Beneficiary 3: LOBA



Oliveira de Azemeis, 23/06/2023

Declaration concerning data processing protection

Grant Agreement No 101060501

I, the undersigned, representing GLOBAZ, S.a. (LOBA hereby confirm that LOBA:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- has a designated **Data Protection Officer**: Adelino Silva, geral@loba.com
- has in place an internal regulation for personal data management and protection and related data privacy policy to safeguard the rights and freedoms of GenB Project's data subjects/research participants.

Alexandre Almeida

Director

Assinado por: **Alexandre Manuel Henriques Almeida**
Num. de Identificação: 10097833
Data: 2023.06.23 12:33:04+01'00'



Beneficiary 4: PEDAL



Bergamo, 26.06.2023

Declaration concerning data processing protection
grant agreement No 101060501

I, the undersigned, representing the PEDAL Consulting hereby confirm that PEDAL Consulting:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- PEDAL designated the Data Protection Officer, the person responsible is Martina Javurkova (martina.javurkova@dimensions.sk).

Robert Miskuf
CEO
SIGNATURE

A handwritten signature in blue ink, appearing to read "Robert Miskuf".

PEDAL Consulting
Securing the right funding,
solving the right problems!

Address: Bjornsonova 5/31, 03601 Martin, Slovakia
Email: secretariat@pedal-consulting.eu
Website: www.pedal-consulting.eu

Beneficiary 5:EUN



Brussels, 05/06/2023

Declaration concerning data processing protection.
Grant Agreement No 101060501

I, the undersigned, representing the EUN Partnership aisbl, hereby confirm that:

- EUN applies ethical principles and guidelines of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- EUN applies data protection rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- EUN takes the protection of personal data seriously. We exclusively collect, store and retain personal data to provide the best possible service and treat this data with the utmost care. The foundation stone for the protection of personal data in EUN is the internal structure which has been set-up consisting of the external Data Protection Officer, inhouse Legal Manager and the Data Protection Group. The various elements of the structure work in close collaboration with the Technical Team who ensure that our technical infrastructure is properly protected and GDPR compliant.
- EUN has appointed an external Data Protection Officer, Hans Graux, a Belgian-qualified attorney and co-founder of the Belgian law firm Timelex with extensive expertise in data protection and privacy as well as IT and IP law. Mr. Graux's appointment as Data Protection Officer has been registered with the Belgian Data Protection Authorities.
- EUN's Legal Manager provides overall advice and guidance to the Office on data protection matters, oversees the data protection and GDPR processes and systems in place, (i.e all registers (data breach logs, access requests, templates), the records of processing activities) and maintain day to day contacts with the Data Protection Officer for GDPR matters. The Legal Manager is supported by the Data Protection Group which consists of thirteen representatives of the various teams in the Office and meets every four weeks to discuss data protection issues arising from the work of the various teams. The Data Protection Group is chaired by the Legal Manager (cansu.tekgul@eun.org) who provides the overall strategic direction.



- EUN has various relevant policies and measures in place, most importantly a Child and Youth Protection Policy, a Data Protection Policy, a Code of Conduct and Acceptable Use Policy, all of which are subject to regular updates.

Marc Durando
Executive Director, EUN Partnership aisbl

A handwritten signature in black ink, appearing to be "M Durando", written over a horizontal line.

Beneficiary 6: ZSI



Vienna, 12th June 2023

Declaration concerning data processing protection
Grant agreement No 101060501

I, the undersigned, representing Zentrum für Soziale Innovation GmbH (ZSI) hereby confirm that ZSI:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- has appointed Mag. Wolfgang Michalek as Data Protection Officer (DPO) pursuant to Art.37 GDPR. Contact details of the DPO are Linke Wienzeile 246, 1150 Vienna, ++43-1-495 04 42, michalek@zsi.at. The appointment of the DPO takes effect on January 1st 2021 and lasts until further notice.
- processes data exclusively on the basis of legal regulations (GDPR). The basic principles of the procedure complying the data protection law, can be described in the context of three complementary and interdependent pillars:
 1. Technical and organisational measures: These represent the internal data protection concept and specify the standards according to which ZSI employees handle and protect all forms of paper-based and electronic information containing personal data from data gathering to destruction of the data after service delivery in accordance to the agreed requirements in each case.
 2. The overall responsibility in terms of data protection coordination, particularly for the specification of requirements, content and objectives of the data protection concept, including the ongoing assessment and improvements of regulations, is assumed by the commercial management in coordination with the internal IT department. The continuous training of ZSI employees regarding the legal prerequisites also takes place at this level.
 3. The ethics committee of ZSI: Its task is to check the implementation of research projects for potential ethical issues. Project leaders can turn to this committee if they see ethical issues touched upon in their work and want to ensure that the project properly considers basic values such as human dignity, freedom and health and does not contradict legal requirements within the meaning of the ethics committee's rules of procedure. In this context, in particular, data protection aspects are also dealt with and decided.

Mag. Wolfgang Michalek
Managing Director



Beneficiary 7: AIJU



València (Spain), June 2nd, 2023

Declaration concerning data processing protection
grant agreement No 101060501

I, the undersigned, representing AIJU (Asociación de Investigación de la industria del Juguete conexas y afines) hereby confirm that AIJU:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- has defined an **internal regulation** for data management and protection and has included a privacy team in its organization chart coordinated by Pablo Busó, mail: pablobuso@aiju.es.

Pablo Busó
USER Research Area Manager of AIJU

Beneficiary 8: Q-PLAN



Thessaloniki, 09/06/2023

**Declaration Concerning Data Processing Protection
Grant Agreement No 101060501.**

I, the undersigned, representing Q-PLAN INTERNATIONAL with seat in 11 EL. VENIZELOU ST, KALAMARIA, THESSALONIKI, PC 55133, hereby confirm that Q-PLAN INTERNATIONAL:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013.
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- **has a designated Data Protection Officer:** Mr. Petros Papadionisiou, papadionisiou@qplan-intl.gr
- has in place an internal regulation for personal data management and protection and related data privacy policy¹ to safeguard the rights and freedoms of **GenB project's** data subjects/research participants.

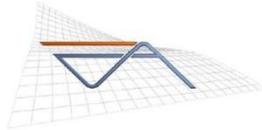
Dimitrios A. Daskalakis,
Director & Legal Representative

Q-PLAN ΔΙΕΘΝΗΣ ΣΥΜΒΟΥΛΕΥΤΙΚΗ ΙΚΕ
"Q-PLAN INTERNATIONAL ΙΚΕ"
ΣΥΜΒΟΥΛΟΙ ΕΠΙΧΕΙΡΗΣΕΩΝ
ΕΛ. ΒΕΝΙΖΕΛΟΥ 11, ΚΑΛΑΜΑΡΙΑ, ΤΚ 55133, ΘΕΣΣΑΛΟΝΙΚΗ
ΤΗΛ: 2310411191 - Ε-MAIL: info@qplan-intl.gr
ΑΦΜ: 099866632 - ΔΟΥ: ΚΑΛΑΜΑΡΙΑΣ
ΑΡ. Γ.Ε.ΜΗ: 58373904000

A handwritten signature in blue ink, appearing to read "D. Daskalakis", is written over the printed contact information.

¹ The Privacy Policy of Q-PLAN INTERNATIONAL is available at the corporate website in [English](#) and [Greek](#).

Beneficiary 9:FVA



FVA NEW MEDIA RESEARCH

Rome, 12 June 2023

Declaration concerning data processing protection
grant agreement No 101060501

I, the undersigned, representing the FVA Sas di Louis Ferrini & C hereby confirm that FVA Sas di Louis Ferrini & C:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance)
- has defined an **internal regulation** for data management and protection, and included a privacy team in its organization chart coordinated by Louis Ferrini mail: ferrini@fvaweb.it

Louis Ferrini
Managing Director

FVA s.a.s.
L'Amministratore
Louis Ferrini

FVA NEW MEDIA RESEARCH - VIALE GORGIA DI LEONTINI 131 - 00124 ROME, ITALY
WEBSITE: WWW.FVAWEB.EU - E-MAIL: INFO@FVAWEB.IT

Beneficiary 10: HSPN



Hellenic Society
for the Protection
of Nature

Athens, 08/06/2023

Declaration concerning data processing protection
grant agreement No 101060501

I, the undersigned, representing the Hellenic Society for the Protection of Nature hereby confirm that the Hellenic Society for the Protection of Nature:

- applies **ethical principles and guidelines** of HORIZON Europe Programme according to Article 19 of the Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013
- applies **data protection** rules according to the regulation (EU) 2016/679 of the European parliament and of the Council of 27 April 2016 on the protection of natural persons with regard the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data protection Regulation) (Text with EEA Relevance).
- has defined an **internal regulation for data management and protection**, and has included a privacy team in its organization chart coordinated by Christos Georgiadis, Project Manager of HSPN's European Projects Department, mail: cgeorgiadis@gmail.com

Nikos Petrou
President of the Board of Directors

7.5 Data protection officers

N.	Beneficiary Name	Country	DPO Name and Surname	DPO Contact details
1	APRE	Italy	N/A ⁸	N/A
2	B.T.G.	Netherlands	Brenda Kooij	kooij@btgworld.com
3	LOBA	Portugal	Adelino Manuel Fonseca da Silva	geral@loba.pt
4	PEDAL	Slovakia	Robert Miskuf	r.miskuf@pedal-consulting.eu
5	EUN	Belgium	Hans Graux; Cansu Akgun Tekgul	eun_dpo@timelex.eu ; cansu.tekgul@eun.org
6	ZSI	Austria	Wolfgang Michalek	michalek@zsi.at
7	AIJU	Spain	Pablo Busó	Pablobuso@aiju.es
8	Q-PLAN	Greece	Petros Papadionisiou	papadionisiou@qplan-intl.gr
9	FVA	Italy	Louis Ferrini	ferrini@fvaweb.it
10	HSPN	Greece	Christos Georgiadis	cgeorgiadis@gmail.com

Table 1: Beneficiaries' DPO contact details

⁸ None of the criteria in Art. 37 sub. 1 of the General Data Protection Regulation (GDPR) are met in the case of APRE.

7.6 Privacy policies of Beneficiaries

Beneficiary 1: APRE

Privacy Policy

[Link](#)

Beneficiary 2: BTG

Privacy Policy

[Link](#)

Beneficiary 3: LOBA

Privacy Policy

[Link](#)

Beneficiary 4: PEDAL

Privacy Policy

[Link](#)

Beneficiary 5: EUN

Privacy Policy

[Link](#)

Beneficiary 6: ZSI

Privacy Policy

[Link](#)

Beneficiary 7: AIJU

Privacy Policy

[Link](#)

Beneficiary 8: Q-PLAN

Privacy Policy

[Link](#)

Beneficiary 9: FVA

Privacy Policy

[Link](#)

Beneficiary 10: HSPN

Privacy Policy

[Link](#)

8. References

- Charter of Fundamental Rights of the European Union 202/389
- Consolidated Version 326/13 of the Treaty on European Union -TEU
- Consolidated version 326/47 of the Treaty on the Functioning of the European Union - TFEU
- Treaty of Lisbon 306/1 amending the Treaty on European Union and the Treaty establishing the European Community, signed at Lisbon, 13 December 2007
- Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013 (Text with EEA relevance)
- Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)

GEN

OUR CONSORTIUM



Funded by
the European Union

www.genb-project.eu

info@genb-project.eu