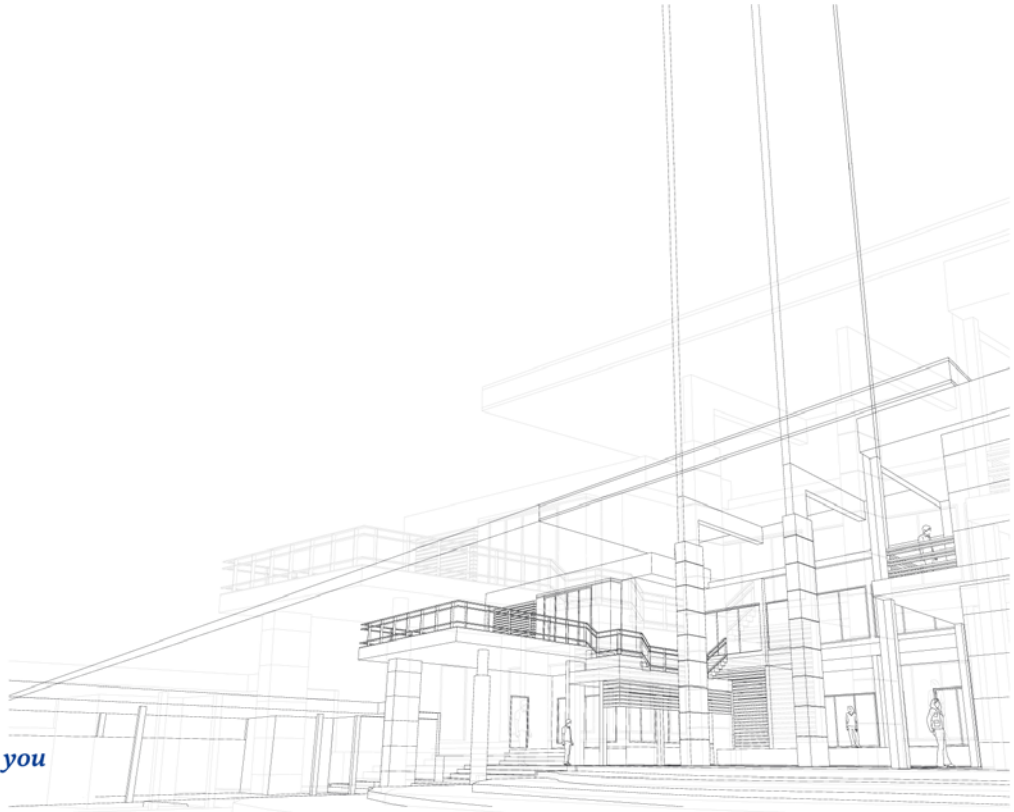


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SUDOE ENERGY PUSH

Data & Privacy Management Plan

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European Regional Development Fund



1. Purpose

The Data Management Plan includes the management data structure, protocols and data flow and how the regulation and principles are considered by the project consortium.

2. Introduction

Handling of data in a project should focus on two basic issues which are: provision of adequate protection on personal data during the project and making the data accessible during and after the duration of the project.

While working with personal data is not in the focus of the SUDOE ENERGY PUSH project, some type of collected information could require relevant privacy consideration. This document explains the measures agreed on to protect the privacy of all subjects in compliance with the guidelines provided by European Commission. This document will be a subject to subsequent updates if required

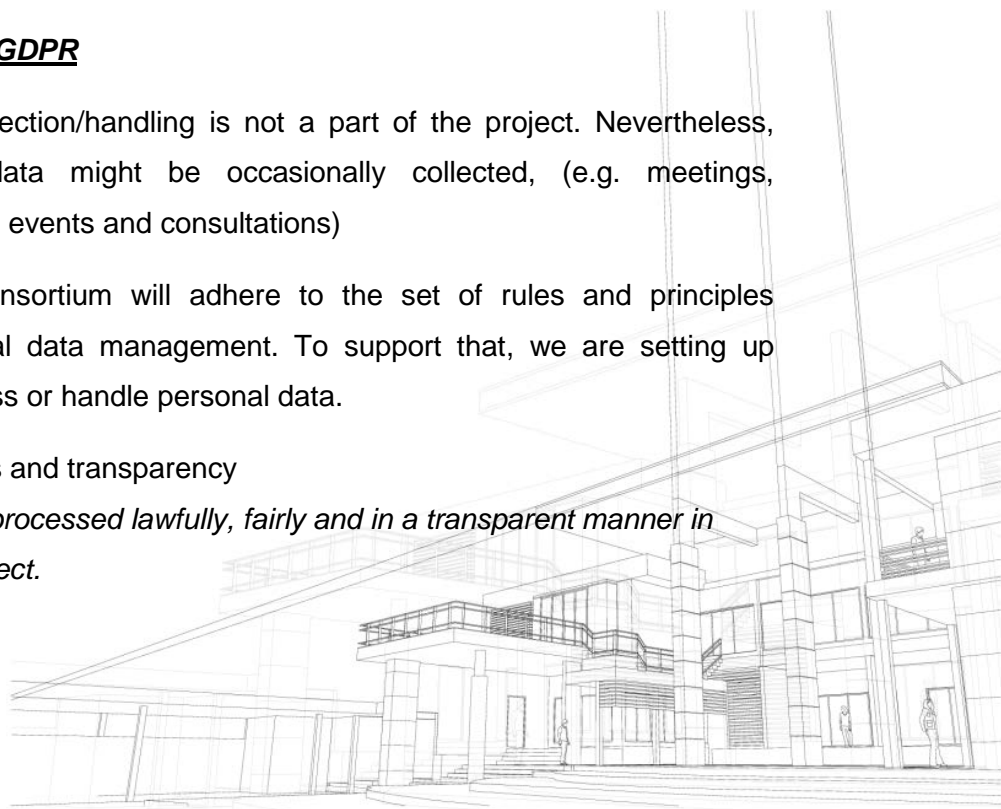
3. Data Management and GDPR

As stated above, data collection/handling is not a part of the project. Nevertheless, some limited personal data might be occasionally collected, (e.g. meetings, workshops/seminars, public events and consultations)

All partners within the consortium will adhere to the set of rules and principles regarding relevant personal data management. To support that, we are setting up guidelines on how to process or handle personal data.

- a) Lawfulness, fairness and transparency

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.





All data collection from individuals containing personal data requires informed consent of the data subjects who are engaged in the project. While we do not envisage a particular need to process personal data, limited personal information may be collected during workshops and training sessions. This may relate to user data as well as anonymous surveys and questionnaires. This may require relevant informed consent to be provided.

The informed consent is a request containing information detailing why the data is collected followed by a consent form. This information enlightens the data subjects about the project, how data collected is processed including storage and sharing of such data. It further informs data subjects about their rights to have data updated or erased.

Data collected which contains personal details will be anonymised if needed for processing. In instances where it is impossible a further consent will be requested from the data subjects before processing.

b) Purpose limitation

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.

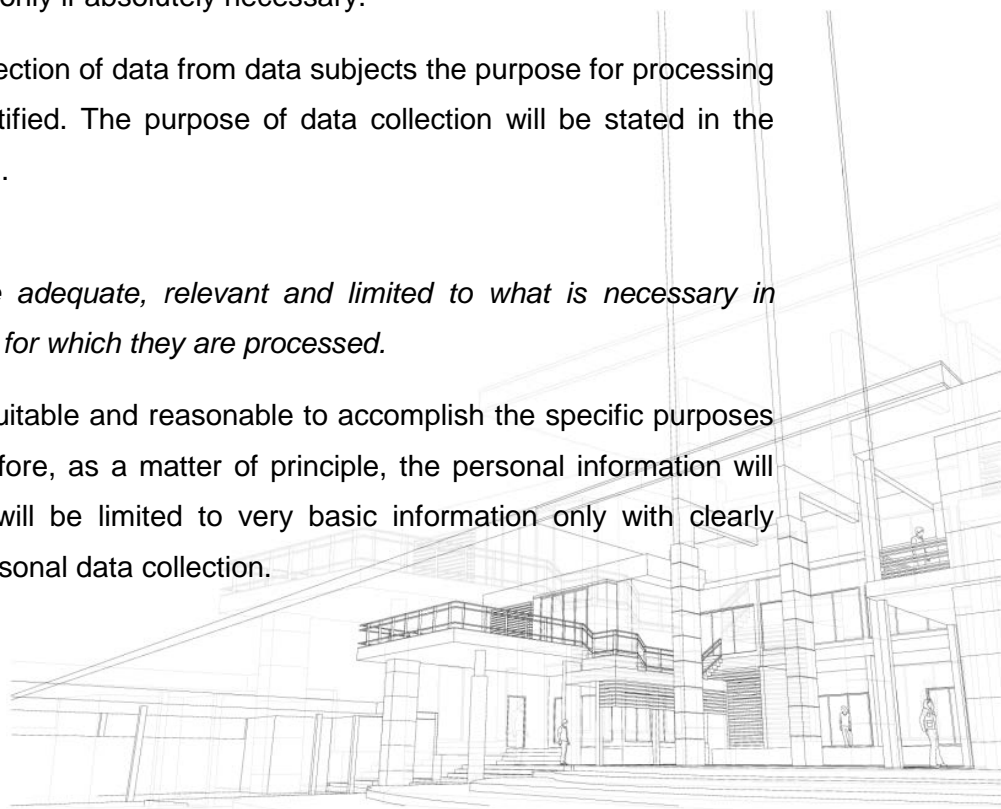
Consortium members will only collect data indispensable within the scope of the project. We envisage that can only happen during workshops, training sessions and stakeholder events and only if absolutely necessary.

In that case, before collection of data from data subjects the purpose for processing those data will be identified. The purpose of data collection will be stated in the participant consent form.

c) Data minimisation

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

Only data considered suitable and reasonable to accomplish the specific purposes will be collected. Therefore, as a matter of principle, the personal information will not be collected or it will be limited to very basic information only with clearly declared purpose of personal data collection.





d) Accuracy

Personal data shall be accurate and, where necessary, kept up to date.

All data collected will be a subject to checking for consistency. Collected data will be verified to prevent inaccuracies and misleading information. Any inaccuracies found will be addressed through reasonable measures such as: updating the information, responding to data subject requests to correct records that contain incomplete information or misinformation.

e) Storage limitation

Personal data shall be kept in a form which permits identification of data subjects for no longer than necessary for the purposes for which the personal data are processed.

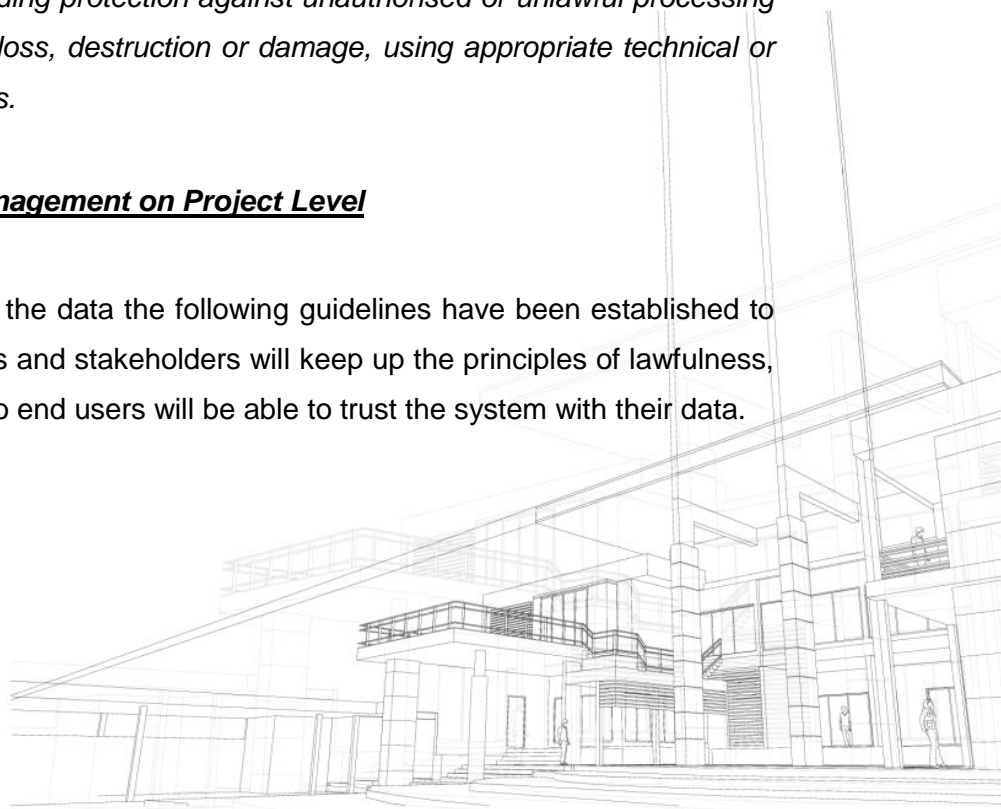
Collected data, where individuals can be identified, that will not be useful from project outputs perspective will be deleted or destroyed (if paper) as soon as possible. The useful data containing personal information will be made anonymous. After the project lifecycle, anonymised data will be stored in an open repository. In situation where it is impossible to anonymise the data, it will be pseudonymized and stored accordingly to archiving rules

f) Integrity and Confidentiality

Personal data shall be 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.

4. Guidelines for Data Management on Project Level

For proper management of the data the following guidelines have been established to ensure the project members and stakeholders will keep up the principles of lawfulness, ethical data management so end users will be able to trust the system with their data.





a. Purpose limitation and Data minimisation

For all the data that will be used in the course of this project, the principle of purpose limitation and data minimisation comes into play. Data should not be collected by project partners out of the project scope

b. Personal Information

Partners should always identify the personal information in all data collected for the purpose of the project. In some cases, combination of non-personal information with other external data may lead to identification of individuals. This type of risk should be always considered and that type of data will be classified as data containing personal information. Datasets with personal information should be kept and treated with confidentiality.

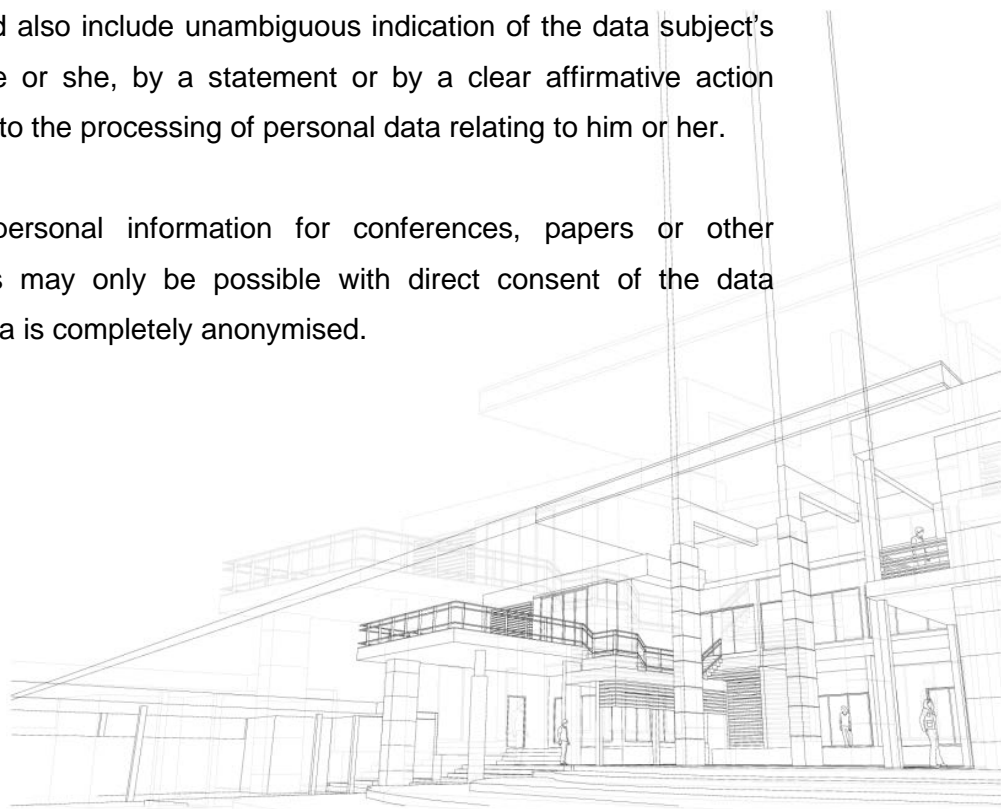
c. Anonymization and Pseudonymisation

Personal data in all the data collected should be anonymised as quickly as possible. In cases where anonymization is not completely possible, such data should be pseudonymised. The link between the pseudonymised file and the list of data subjects will be stored in a separate location from the original files bearing in mind data subjects right to withdraw their consents.

d. Informed consent

During the collection of the personal data from data subjects, project partners should request for their consent. This consent should be freely given, specific, informed and should also include unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action signifies agreement to the processing of personal data relating to him or her.

Dissemination of personal information for conferences, papers or other dissemination items may only be possible with direct consent of the data subjects or if the data is completely anonymised.



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