driver+

Driving Innovation in Crisis Management for European Resilience

D913.11 – ETHICAL APPROVAL

SP91 - PROJECT MANAGEMENT

DECEMBER 2017 (M44)

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Revision Table

Issue	Date	Comment	Author
V0.1	23/11/2017	First full draft.	Stine Bergersen & Bruno Oliveira Martins, PRIO. WP913 leader.
V0.2	26/11/2017	Peer review.	Marcel van Berlo (TNO).
V0.3	27/11/2017	Revision according to first review.	Stine Bergersen & Bruno Oliveira Martins, PRIO. WP913 leader.
V0.4	13/12/2017	Inclusion of Terminology Annex.	Stine Bergersen & Bruno Oliveira Martins, PRIO. WP913 leader.
V0.5	15/12/2017	Peer review. Delivery of DRS.	Marcel van Berlo (TNO).
V0.6	15/12/2017	Revision according to second review, ready for quality check.	Stine Bergersen & Bruno Oliveira Martins, PRIO. WP913 leader.
V0.7	18/12/2017	Final check and approval for submission	Tim Stelkens-Kobsch, Quality Manager (DLR)
V0.8	28/12/2017	Final check and approval for submission	Peter Petiet, Project Director (TNO)
V1.0	29/12/2017	Submission to the EC	Francisco Gala (ATOS)

The DRIVER+ project

Current and future challenges due to increasingly severe consequences of natural disasters and terrorist threats require the development and uptake of innovative solutions that are addressing the operational needs of practitioners dealing with Crisis Management. DRIVER+ (Driving Innovation in Crisis Management for European Resilience) is a FP7 Crisis Management demonstration project aiming at improving the way capability development and innovation management is tackled. DRIVER+ has three main objectives:

1. Develop a pan-European Test-bed for Crisis Management capability development:
    - Develop a common guidance methodology and tool (supporting Trial and the gathering of lessons learned
    - Develop an infrastructure to create relevant environments, for enabling the trialing of new solutions and to explore and share CM capabilities
    - Run Trial in order to assess the value of solutions addressing specific needs using guidance and infrastructure
    - Ensure the sustainability of the pan-European Test-bed
2. Develop a well-balanced comprehensive Portfolio of Crisis Management Solutions:
    - Facilitate the usage of the portfolio of solutions
    - Ensure the sustainability of the portfolio of tools
3. Facilitate a shared understanding of Crisis Management across Europe:
    - Establish a common background
    - Cooperate with external partners in joint Trial
    - Disseminate project results

In order to achieve these objectives, five Subprojects (SPs) have been established. **SP91** ***Project Management*** is devoted to consortium level project management, and it is also in charge of the alignment of DRIVER+ with external initiatives on crisis management for the benefit of DRIVER+ and its stakeholders. In DRIVER+, all activities related to SIA (from the former SP8 and SP9) are part of SP91 as well. **SP92** ***Testbed*** will deliver a Guidance methodology and guidance tool supporting the design, conduct and analysis of Trial and will develop a reference implementation of the test-bed. It will also create the scenario simulation capability to support execution of the Trials. **SP93** ***Solutions*** will deliver the Portfolio of Solutions (PoS) which is a database driven web site that documents all the available DRIVER+ solutions, as well as solutions from external organisations. Adapting solutions to fit the needs addressed in Trial will be done in SP93. **SP94** ***Trials*** will organize four series of Trial as well as the final demo. **SP95** ***Impact, Engagement and Sustainability***, is in charge of communication and dissemination, and also addresses issues related to improving sustainability, market aspects of solutions, and standardization.

The DRIVER+ Trial and the Final Demonstration will benefit from the DRIVER+ Test-bed, providing the technological infrastructure, the necessary supporting methodology and adequate support tools to prepare, conduct and evaluate the Trial. All results from the trails will be stored and made available in the Portfolio of Solutions, being a central platform to present innovative solutions from consortium partners and third parties and to share experiences and best practices with respect to their application. In order to enhance the current European cooperation framework within the Crisis Management domain and to facilitate a shared understanding of Crisis Management across Europe, DRIVER+ will carry out a wide range of activities, whose most important will be to build and structure a dedicated Community of Practice in Crisis Management (CoPCM), thereby connecting and fostering the exchange on lessons learnt and best practices between Crisis Management practitioners as well as technological solution providers.

Executive summary

This deliverable describes the third round of ethical and data protection approvals and notifications required by the DRIVER+ partners for activities between M41 (September 2017) to M47 (March 2018). The deliverable itself is not an input to any other DRIVER+ deliverable, since it documents an administrative procedure, and it is the third of its kind. As with the previous two (1) (2), the key purpose of this deliverable is to collect the documentation that is due at this point in time, and forward them to the Project Officer. The aim of this line of deliverables is to uphold a continuous overview of the status of ethical approvals throughout the project.

Also after the restructuring of the project, the most important approvals needed for the various DRIVER+ tasks are data protection approvals that are issued by the local data protection agencies of those partners who lead the respective tasks. These constitute most, if not all approvals foreseen within DRIVER+.

Since the project restarted in September 2017, the main bulk of project activities have consisted of activities relating to planning and organizing. Activities involving external participants, which are the most likely to need data protection approval (and where informed consent will be a requirement) are mainly foreseen from M47 onwards (starting with “Updated Gaps Assessment Workshop” Mid-January 2018 and “Workshop 0” in late February 2018).

In sum, many DRIVER+ tasks are in the planning, and some pending research activities will need approval at a later stage in the project. After the restart of the project in September 2017, it was necessary to implement the ethics approvals procedures from the original project structure again in DRIVER+. After informing the partners about the relevant procedures, all project activities that have been reported to PRIO, and that is foreseen to need data protection approval up until and including M47, is described and documented in this deliverable. PRIO is in charge of coordinating this process, and for providing advice and support to the partners; however, it is the legal responsibility of the individual partners that the relevant approvals are in place for their activities.

The statuses of all the activities that have been reported to PRIO in this round are summarized in tables in Chapter 3, and all relevant communication and documentation are archived at PRIO and retrievable on request by the Project Coordinator, the Ethical and Societal Advisory Board or the European Commission Project Officer. The template which was sent out to the partners to collect this information, as well as the email by PRIO accompanying this, are attached in Annex, together with the already available supporting documentation to go with the table.

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List of Acronyms

Acronym	Definition
CM	Crisis Management
CoPCM	Community of Practice in Crisis Management
CoW	Collaborative Workspace
D	Deliverable
DoW	Description of Work
DPA	Data Protection Authority
ESAB	Ethical and Societal Advisory Board
FP7	Framework Program 7 of the EU
M	Month
PoS	Portfolio of Solutions
REA	Research Executive Agency
SC15	Special Clause 15
SP	Subproject
T	Task
WP	Work package

1. Introduction

Within FP7 projects, Special Clause 15 (SC15) regulates the collection and processing of personal data, which means that any research involving personal data is subject to approval by the data protection authorities (DPAs) of the country in which the data is collected.

This deliverable is a follow-up deliverable to D95.22 (1) and D95.23 (2) and it follows the same basic structure as these two previous deliverables. The current deliverable contains the third collection of the ethical approvals (i.e. data protection) for the project activities between M41 – M47. This deliverable also reminds the DRIVER+ consortium about the approval procedures, and it collects the approvals that are due at this point in time. It collects, respectively, information on the tasks/ activities that were reported by partners to PRIO in this round. The information requested from partners was:

- Task leader/ contact person;
- Description of data collecting activity;
- Activity starting date;
- Related task / WP / SP[1];
- Is an approval by the relevant data protection authority necessary? (yes[2]/no);
- Is a notification to the relevant data protection authority necessary? (yes[3]/no).

Table 3.1 is a summary of the templates referring to tasks not requiring approval nor notification to the data protection authority, while Table 3.2 is a summary of the templates referring to tasks requiring approval or notification to the data protection authority. For all the tasks comprised and explained in the tables, email exchanges and the original filled-out templates by each partner/ partner representative are archived at PRIO and are retrievable on request by the Project Coordinator, the Ethical and Societal Advisory Board (ESAB) or the European Commission Project Officer.

The deliverable D91.3 *Ethical procedures, risks and safeguards* (3) is still the main document describing the procedures and requirements for research ethics and data protection issues in the project. In especially complicated cases, the national Data Protection Authorities should be consulted for advice. PRIO can also be consulted in special cases, preferably for more procedural inquiries. Furthermore, as a new feature in DRIVER+, guidelines, checklists and templates (for applying for data protection approval and for informed consent) will be made available for all partners online via the Collaborative Workspace (CoW). This means that the administrative burden will be lessened, and that the information about data protection procedures and informed consent will be made accessible to all in an online format. This will mainly happen as an online component in the DRIVER+ Project Handbook on the COW, but these topics will also be translated into features of the permanent structure of the DRIVER+ Portfolio of Solutions and the DRIVER+ Guidance Tool[4].

A complete update on the concrete implementation of research ethics procedures, also with regards to external cooperation, will be presented in the upcoming third Ethical Monitoring Report. In short, PRIO is currently discussing with ARTTIC (WP912) as well as with SRC PAS (SP94) the implementation of research ethics procedures both for external events and for the DRIVER+ Trials (and in particular the inclusion of volunteers in the Trials).

[1] If no approval or notification is required for the activities between M41-M47 in a certain WP, a general statement can be made here, such as: "No activities in WPXX are in need of approval/ notification between M41-M47".

[2] If approval is needed, documentation needs to be sent to PRIO by 1st December 2017.

[3] If a notification is necessary, documentation needs to be sent to PRIO by 1st December 2017.

[4] The concrete implementation into SP92 and SP93 are currently being discussed with the respective SP/ WP leaders at the final drafting stage of this deliverable. However, the input to the DRIVER+ project Handbook was submitted to TNO as per 20.11.2017, and has been implemented online at the time of the submission of this deliverable.

2. Information Procedure & types of approvals in DRIVER+

2.1 DRIVER+ ethics procedures: Informing the consortium

Research conducted within the DRIVER+ project seeks to maintain high ethical standards. As a continuation of the successful ethics procedures from the original project structure, several mechanisms and tasks are set in place after the restructuring process to ensure this.

Basically, the work on research ethics and data protection issues is carried out via two main tasks:

- In T913.1, which has as its overarching objective to inform and advise partners regarding research ethics (SC15) and to collect the required authorisations and notifications for all project activities. This task also monitors and systematically screens the project with regards to emerging ethical issues, and addresses and reports on these in annual Ethical Monitoring Reports. This task is being coordinated by PRIO.
- In T913.2, where PRIO coordinates the DRIVER+ Ethical and Societal Advisory Board. The Board will convene four times during the remainder of the project. Each meeting discusses research ethics issues and questions that are relevant to the project and that have been mentioned by partners in the annual ethical monitoring reports. PRIO is the link between the Board and the rest of the project, and the Ethical Monitoring Reports (where all partners provide input) is the key vantage point for the meetings between PRIO and the Board. The next meeting of the ESAB will be held in Valabre on the 16th January 2018.

The DRIVER+ consortium was reminded and updated on the potential necessity to obtain approvals via an email to all SP leaders 3rd November 2017 (in Annex to this deliverable), and their feedback was requested by the 15th November 2017. A template (also in Annex) for the partners to fill out was included in the original email. The deadline for providing potentially relevant documentation was set to 1st December 2017, and reminders have been sent to the consortium to follow up these requests. PRIO has continued to follow up with individual SP leaders and task leaders when necessary, to explain procedures and remind the respective responsible partners of their approval process.

The next Ethical Monitoring Report (D913.13 due in M50) will also document and address key ethical issues identified in DRIVER+, and it will repeat and refine some core points from the two previous Ethical Monitoring Reports; both to clarify some particularly important points regarding research ethics, but also to update and specify previously given guidelines. This is especially important due to the inclusion of new partners in the DRIVER+ consortium, which have not been part of the ethics procedures before. It might also be that newly added CM solutions, or the combination of solutions, might trigger new needs and thus need to be addressed.

These procedures have already been implemented via several previous deliverables, for example, in D95.22 *Ethical Approval 1* (1) and D95.31 *Ethical Monitoring Report* (4). Obligations set out by the European Commission are furthermore embedded in the Grant Agreement of the DRIVER+ project in a variety of ways, most prominently through the general contractual mechanism put in place in order to assure this high standard of research ethics, known as Special Clause 15.

Special Clause 15 states:

The beneficiary(ies) shall provide the REA with a written confirmation that it has received (a) favourable opinion(s) of the relevant ethics committee(s) and, if applicable, the regulatory approval(s) of the competent national or local authority(ies) in the country in which the research is to be carried out before beginning any REA approved research requiring such opinions or approvals. The copy of the official approval from the relevant national or local ethics committees must also be provided to the REA.

As the implications and obligations linked to SC15, as well as the discussions and information given in previous deliverables regulating research ethics in the project show, research conducted in the DRIVER+ project continues to be subject to two kinds of approvals. These are detailed in the following.

2.2 Kinds of approvals needed in DRIVER+

No indication that approvals beyond what is described below will be needed for DRIVER+ have been identified at this stage. Although PRIO will continue its systematic screening of the project, to potentially identify new needs and requirements, this means that there are two kinds of ethics approvals that are relevant for DRIVER+.

1) General data protection approvals
2) Potentially, other ethical approvals relating to 'play acting' and research activities taking place in the field or in the public.

A lot of the research activities within DRIVER+ revolve around the Trials. The DRIVER+ Trials combine many research activities under this umbrella term, all of which are organized in SP94, and which will be carried out via four Trials (in Poland, France, Austria and the Netherlands) and a Final Demonstration (Italy and Poland). These Trials will consist of several interlinked activities, and data collection is foreseen through, for example, registration in participant portals, interviews, focus groups, the testing of software or desktop simulations, which can or cannot involve human participants. In line with these methods and in order to protect personal data collected in these tasks, the most important approvals needed are data protection approvals that are issued by the local data protection agencies of those partners who lead the respective task. These (still) constitute most, if not all approvals within DRIVER+. However, the second category listed above, indicates that other particular approvals and more advanced informed consent forms might be needed if e.g. external participants play out scenarios or are involved in more physically challenging activities.

While the final scenarios of the Trials are yet to be decided, preliminary discussions with the coordinator of SP94 - Trails (SRC PAS), has indicated that it is likely that the Trials (more specifically Trial 1 in Poland and Trial 3 in Austria) or the Final Demonstration includes elements of play acting, which may include affiliated volunteers or citizens. In that case, DRIVER+ partners have to ensure that no harm is being done to participants and bystanders. If such elements will be part of the Trials, additional approvals might be necessary, and have to be sought from the relevant national ethics committee of the responsible partner. It is also recommended to use more comprehensive informed consent forms for the volunteers. PRIO will follow up on this, and will review all the documents used. Often, data protection authorities and other ethical committees are gathered in one authority that may issue both kinds of approvals. Otherwise, some institutions (such as large companies, universities, and laboratories etc.,) have their own ethical advisory boards, which do have authorization to issue approvals. In any case, the relevant procedures and requirements need to be investigated in the individual cases, and PRIO remains at the disposal of the partners to help clarify such issues.

Although more elaborate kinds of approvals might be relevant at a later stage in the project, **all tasks mentioned in this report are in need of approvals by data protection authorities only.** Since research within DRIVER+ does not foresee testing on human or animal cells, medical approvals are still of no need within DRIVER+.

2.3 Impact of the restructuring into DRIVER+

In addition to the abovementioned process of informing the consortium, and implementing the procedures, some additional considerations should be mentioned relating to suspension and restructuring of DRIVER into DRIVER+, officially restarting on 1st September 2017. Since many DRIVER+ tasks are still in the planning (such as the four Trials) it is very likely that research activities in need of approvals happen at a later stage in the project. These will be included in the next round of collected approvals, which will be submitted in the final reporting period of DRIVER+ in M56.

3. Overview of Approval Statuses

3.1 Explanation of the Approval Statuses

All tasks that have been reported to PRIO are listed below. While this overview shows the status of the different tasks, it is the task leader who is the responsible for obtaining the actual approval. The status of the different activities is indicated in the tables below, and relevant communication and documentation is detailed in next sections. Some tasks are covered by approvals from another task (cf. combination of approval processes) or are covered by approvals or notifications obtained within the previous structure of the project. After receiving the filled-out templates in return from the partners, the next step is to go through the information and follow up whenever that was necessary. This follow-up does not end with this deliverable, but will continue to be carried out in T913.1 throughout the rest of the project. PRIO also expects more issues to surface following the distribution of the questionnaire that will be sent to all partners in preparation of the third Ethical Monitoring Report.

The template distributed to all the SP leaders was simplified quite a bit since the previous rounds. In essence, it only asks partners to describe their activities in two options: whether approval by relevant data protection authorities is necessary or if a notification to the relevant data protection authority is necessary. If the answer to any of these questions was "yes" a few more boxes have to be filled out, detailing what the status of this is, allowing PRIO to follow up with the partner(s) as relevant. Two examples are given:

1) "E.g. application for approval sent to the Norwegian Data Protection Authority 03/11/2017. Documentation of this will be sent to PRIO by 1st December 2017".
2) "E.g. a notification will be submitted to the Norwegian Data Protection Authority shortly. Documentation of this will be sent to PRIO by 1st December 2017".

The latter category was included already in the first round of approvals, since it was already clear that not all Data Protection authorities (DPAs) issue approvals, but that the data protection procedure in certain cases is completed by notifying the DPA, or by registering the project/ activity with the DPA or similar national authorities. In that case the application form or registration form will be stored at PRIO and be available upon request.

If a partner reports that there is no data being collected/ no approval needed, this means that the task does not collect personal data at all, and that the partners do not need approval or to notify the DPA. Why they are not collecting personal data is often explained and documented in respective emails, which are also archived at PRIO and can be forwarded upon request. In some cases it might be that an application is in progress, but not ready at the time of submission of the current deliverable, e.g. because a reply from the DPA might be pending. In that case, as agreed with the PO in the early stages of the project, the application form or registration form is attached in the Annex for documentation. It might also be that activities expected to need approval or notification is postponed so that it falls outside the scope of the reporting period for the deliverables. Such explanations are archived at PRIO and can be forwarded upon request. It may also happen that a task lasts from M41 to M72. In that case, relevant research activities may start at a later stage, and thus the need for approval might appear only later in the project.

3.2 Reported activities M41 – M47 that do not require approval

The number of templates received in this round was a small number. This is largely explained by the fact that the deadline for the first submission of templates occurred only two and a half months after the beginning of the new stage of DRIVER+. This means that, by the established deadline of 15th November 2017, there were not many tasks including data collection being implemented, and only a few were being prepared within the time-frame under analysis (M41- M47). It is expected that the next collection of information, planned for M47 onwards, will generate more relevant information, especially since this will include all four of the DRIVER+ Trials, as well as the Final Demonstration.

Out of the three tasks requiring notification to the relevant data protection authorities, two have been notified to these authorities, and a third one was reportedly submitted by 15th November 2017.

Table 3.1: Templates of tasks neither requiring approval nor notification to data protection authority

Task leader/ contact person	Description of data collecting activity	Activity starting date	Related task / WP / SP[5]	Is an approval by the relevant data protection authority necessary? (yes[6]/no)	Is a notification to the relevant data protection authority necessary? (yes[7]/no)
Esther Kähler (DIN)	None	-	WP955	No	No
Chiara Fonio, JRC	No activities in WP921 and in T922.1 and T922.2 (WP922) and T923.1 (WP923) are in need of approval/notification between M41-47	-	-	No	No

[5] If no approval or notification is required for the activities between M41-M47 in a certain WP, a general statement can be made here, such as: "No activities in WPXX are in need of approval/ notification between M41-M47".

[6] If approval is needed, documentation needs to be sent to PRIO by 1st December 2017.

[7] If a notification is necessary, documentation needs to be sent to PRIO by 1st December 2017.

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FRQ / Ludwig Kastner	Exchange of data between software tools via technical interfaces	M47	T934.3	NO, we assume that the data which come from other partners tools to our tool are approved by these partners.	NO, we assume that the data which come from other partners tools to our tool are approved by these partners.
DLR / Dagi Geister, Konstanze Lechner	Possibly data from Trial evaluation (e.g. interviews, focus groups, questionnaires, …)	M51	SP94, WP946, T946.5	No, not yet	No, not yet
GMV/ Hector Naranjo	-	M41	GMV is involved in different WPs and Tasks in all SPs but not any Task is being led by GMV between M41-M47	NO	NO
HKV/ Job Verkaik	None. HKV contributes to the guidance methodology, the implementation of it and scenario building.	M41	WP 922, 924, 933, 946, 947	NO	NO
VALABRE/Alice Clémenceau	focus groups (workshop on gaps assessments)	M45	T922.1(leader) WP922, SP92	NO (no “sensible” personal data as defined in French regulation will be collected)	NO (no “sensible” personal data as defined in French regulation will be collected)
VALABRE/Alice Clémenceau	No data collecting activity in this period	-	WP944 (leader)	-	-

SRC PAS/ Joanna Tymińska	Contact for the purpose of organizing Workshop "0"	M43	MS21, WP941, SP94	No activities in WP941 are in need of approval/ notification between M41-M47. Status: In the upcoming 6 months, the only opportunity during, which SRC will be gathering and using personal data is Workshop "0", which will be 5 days long conference. The personal data we are gathering is name, surname, organization name, and email addresses. We gather those data for managerial purposes and we do not intent to share those data with anyone from external environment of the project. Our national Polish legislation and data protection act doesn't oblige us to be monitored nor to notify any organs due to organisation of this event.	No activities in WP941 are in need of approval/ notification between M41-M47. Status: In the upcoming 6 months, the only opportunity during, which SRC will be gathering and using personal data is Workshop "0", which will be 5 days long conference. The personal data we are gathering is name, surname, organization name, and email addresses. We gather those data for managerial purposes and we do not intent to share those data with anyone from external environment of the project. Our national Polish legislation and data protection act doesn't oblige us to be monitored nor to notify any organs due to organisation of this event.
EDISOFT/ João Vale	None known at the moment	-	-	NO Status: We are a Solution Provider on the scope of DRIVER+ with a very limited scope and no responsibility in any Task or Deliverable. At the moment, we don't have any collecting data activity foreseen.	NO Status: We are a Solution Provider on the scope of DRIVER+ with a very limited scope and no responsibility in any Task or Deliverable. At the moment, we don't have any collecting data activity foreseen.
DWR/Martin Bjerregaard	Damage data from satellite imagery	M41-end of Project	SP93 & SP94	NO	NO

TNO/ Peter Petiet, Marcel van Berlo	Personal data registration w.r.t. applying to the Advisory Board.	M41	T911.4, WP911, SP91	NO	NO
TNO/ Peter Petiet, Marcel van Berlo	Personal data registration of external guests w.r.t. attending the KoM.	M41	T911.4, WP911, SP91	NO	NO
Atos / Pedro Soria	None of the tasks of Atos in the project involve the collection or processing of personal data	N/A	N/A	NO	NO
Thales Services/ Edith Felix	Nothing to declare.	N/A	N/A	NO	NO
CSDM/ Todor Tagarev	CSDM is not collecting any personal data in its research. Also, we got approval from the national ethics authority (Commission for Personal Data Protection) in the beginning of DRIVER.	N/A	N/A	N/A	N/A

3.3 Reported activities M41- M47 that require approval/ notification

Table 3.2: Templates of tasks requiring approval or notification to data protection authority

Task leader/ contact person	Description of data collecting activity	Activity starting date	Related task / WP / SP[8]	Is an approval by the relevant data protection authority necessary? (yes[9]/no)	Is a notification to the relevant data protection authority necessary? (yes[10]/no)
ARTTIC/Stéphanie Albiero & Michael Löscher	Contact database as part of the Online Community Platform	M41	T953.3/WP953/ WP95	NO	Done already Status: SP95 is concerned only by the collection of personal data regarding the Online Platform/External cooperation platform, and therefore the Community of Practice The data collected is basic data, such as name, address, domains of professional interest, etc. of persons interested in the activities of the DRIVER project, referred to as the DRIVER Community. This data is used 1) for disseminating information (e.g. newsletters, invitation to events organized by the project, etc.) to professionals in the Crisis Management domain, and 2) to give these persons access to on-line services offered by the project, in particular to the Online Community Platform (OCP). This data is stored in a data base held by DRIVER+ partner ARTTIC, i.e. in France in accordance with the French 1978/01/06 law. Data collection is done over on-line forms and is a voluntary act of the

[8] If no approval or notification is required for the activities between M41-M47 in a certain WP, a general statement can be made here, such as: "No activities in WPXX are in need of approval/ notification between M41-M47".

[9] If approval is needed, documentation needs to be sent to PRIO by 1st December 2017.

[10] If a notification is necessary, documentation needs to be sent to PRIO by 1st December 2017.

					concerned person - no data is collected without the consent. The persons registering their data are informed about the intended use of the data and on their right to access, modify or remove the stored data at any time. The data collection file has been declared to the French Administrative Authority for data protection (CNIL) under the Declaration n° 1620342 v0. No unforeseen problems have been encountered. The declaration to CNIL is in Annex to this deliverable, and the full declaration is stored with PRIO, and is available upon request.
Ecorys / Laura Birkman	Interviews, workshops, questionnaires.	M44	T953.1/WP953/ SP95 T954.2/WP954/ SP95[11] T954.4/WP954/ SP95	NO	YES Status: A notification will be submitted to the Dutch Data Protection Authority on 15-11-2017. Documentation of this will be sent to PRIO by 1st December 2017. Update: The notification has been received by PRIO 1st December 2017, and is in Annex to this deliverable.
ITTI / Piotr Tyczka	Collecting the personal data of the CM practitioners in order to invite them to the I4CM event	M41	T953.4	NO	YES Status: A notification on collecting the personal data of CM practitioners by ITTI for the purpose of carrying out the DRIVER project activities was submitted to the Bureau of the Inspector General for the Protection of Personal Data in Poland (GIODO) on 24 April 2015 (Ref.no.: WWW 45250415). It was registered by GIODO under the following signature: r010732/15. Submitted document to GIODO (in Polish) is attached.
SGSP/ Magdalena Gikiewicz, Tomasz Zwęgliński	-Name -Organization -Country	M41	WP943, T943.3	NO	YES Status: The data set for registration has been submitted to

[11] TNO is formal leader of this task, but Ecorys will be carrying out the bulk of the data collection.

	-E-mail -Telephone -Address -Photo -Profession -Questionnaire interview.				the General Inspector for the Protection of Personal Data, in accordance with Polish law in force. Reference number 42841117.

4. Summarising conclusion & Way forward

As this deliverable has shown, the approvals needed for the DRIVER+ tasks in the period M41 – M47 have been obtained or are in the process of being obtained. The current document is part of a series of deliverables where the next one of which is due in M56. That deliverable will contain the approvals needed between M48 and M72. This next and final reporting period is rather extensive, so it is likely that not all documentation will be ready by the time the deliverable is due. In this case, documentation and communication will be forwarded in other formats, for example as part of the final Ethical Monitoring Report (D913.14) due in M62, or in other periodical DRIVER+ reports on SP level.

The next meeting of the DRIVER+ Ethical and Societal Advisory Board (ESAB) will take place on the 16th January in Valabre, and the Board will also take part in the introductory meeting with the regular Advisory Board on the 15th January. During the dedicated ESAB-meeting, the procedures described and implemented in the current deliverables will again be discussed with the Board members. The procedures, and its guidelines and suggested templates, are currently being implemented in the DRIVER+ Project Handbook and on the Collaborative Workspace, and during the next couple of months, the same procedures will be integrated in other parts of the project, e.g. SP92 and SP93. The integration of data protection procedures and guidelines in the PoS and in the SP92 DRIVER+ Guidance Tool will ensure that these requirements are fulfilled in relation to the DRIVER+ Trials.

Since the next round of data protection/ research ethics approvals will cover both the four Trials and the Final Demonstration, the final deliverable in this series is expected to be large, and contain a lot more information than this current deliverable. However, including all the Trials in one round, allows for a more coherent take on the activities, also with regards to information procedures from PRIO and to the partners. In especially complicated cases, the national Data Protection Authorities should be consulted for advice. PRIO can also be consulted in special cases, preferably for more procedural inquiries. Furthermore, as a new feature in DRIVER+, guidelines, checklists and templates (for applying for data protection approval and for informed consent) will be made available for all partners online on the CoW. This means that the administrative burden will be lessened, and that the information about data protection procedures will be made accessible to all in an online format. This will mainly happen as an online component in the DRIVER+ Project Handbook, but these topics will likely also be translated into features of the permanent structure of the DRIVER+ Portfolio of Solutions and the DRIVER+ Guidance Tool[12].

[12] The concrete implementation into SP92 and SP93 are currently being discussed with the respective SP/ WP leaders at the final drafting stage of this deliverable. However, the input to the DRIVER+ project Handbook has already been submitted to TNO as per 20.11.2017.

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References

1. **Kaufmann, Mareile.** *D95.21 Ethical Approval 1.* s.l. : DRIVER project, 2014.

2. **Bergersen, Stine.** *D95.23 Ethical Approval 2.* s.l. : DRIVER project, 2015.

3. —. *D91.3 Ethical Procedures, Risks and Safeguards.* s.l. : DRIVER project, 2016.

4. —. *D95.31 Ethical Monitoring Report.* s.l. : DRIVER project, 2015.

Annexes

Annex 1 – DRIVER+ Terminology

In order to have a common understanding within the DRIVER+ project and beyond and to ensure the use of a common language in all project deliverables and communications, a terminology is developed by making reference to main sources, such as ISO standards and UNISDR. This terminology is presented online as part of the Portfolio of Solutions and it will be continuously reviewed and updated[13]. The terminology is applied throughout the documents produced by DRIVER+. Each deliverable includes an annex as provided hereunder, which holds an extract from the comprehensive terminology containing the relevant DRIVER+ terms for this respective document.

Terminology	Definition	Comment
Best Practice	This encompasses the preferred actions in a specific type of situation to efficiently and effectively achieve a certain objective. Best Practice may be formalised in internal policy documents such as handbooks and standard operation procedures and could be based on one or several Lesson Identified/Lessons Learned approved by decision-makers.	
Data, personal	Information relating to an identified or identifiable individual that is recorded in any form, including electronically or on paper.	
Data, sensitive	Data with potentially harmful effects in the event of disclosure or misuse.	
Data Protection Approval	Procedure of applying to the national or local Data Protection Authority to report about the collection, storage and/or analysis of personal data for a specific task. Whether reporting the activity is enough or actual approval is granted depends on the respective data protection authority. The task leader is generally the legal owner of this procedure.	
Guidance Methodology		Definition is still “under construction” and can be found online in the near future.
Informed consent		Definition is still “under construction” and can be found online in the near future.
Research ethics		Definition is still “under construction” and can be found online in the near future.
Table top exercises		Definition is still “under construction” and can be found online in the near future.

[13] Until the Portfolio of Solutions is operational, the terminology is presented in the DRIVER+ Project Handbook and access can be requested by third parties by contacting coordination@projectdriver.eu

Terminology	Definition	Comment
Trial		Definition is still “under construction” and can be found online in the near future.
Trial Action Plan (TAP)		Definition is still “under construction” and can be found online in the near future.

Annex 2 – Email sent to SP leaders 03/11/2017

Dear partner in DRIVER+,

Summary of the following email:

Any project activity until end of M47, that may require ethics approval, needs to be reported to PRIO before 15th November, and info on the status of the actual approval/ notification has to be forwarded to PRIO by 1st December 2017. For both purposes, please use the templates enclosed.

This email is sent to all PoC's in DRIVER+, and it is meant to inform you about the implementation of research ethics in the project. As some of you may remember, this was PRIO's task in the old DRIVER as well, so some of you knows the drill already (and it might be that approvals made for the old DRIVER are still valid). Please forward this email to the relevant people in your organization if you are not that person.

Basically, PRIO is here to make sure that research ethics procedures are taken into account in the project. Research ethics, and especially data protection issues, are increasingly important to REA, so it is crucial that this task gets proper attention.

It is the responsibility of each task leader to report to PRIO if you are planning to carry out activities that might require you to get approval from an ethics board or from your national data protection authority, and PRIO is here to give support and guidance.

Based on guidelines already provided (attached- D91.3), and the table below, all partners have to decide if some kind of approval (this means data protection approval in most cases) is needed for their activities. After doing this, the responsible organization should let PRIO know about the result, and if approval *is* needed, a copy of these needs to be forwarded to us. If you do need approval, a template for this is also attached to this email. PRIO then collects all approvals/ notifications (in some cases it is sufficient just to notify relevant authorities about upcoming activities), and forwards them to the PO/the REA in annual deliverables. The first one of these deliverables is due now in M44.

What we need you to do:

Consult the step-by-step instruction below to decide if the activities (between M41-M47) that you are leading require approval.

- If you need more information, please let us know, or have look at the DRIVER research ethics guidelines, which are attached to this email (in the shape of D91.3).
- **Whether approval is needed or not: all partners should fill out and return "Template 1" to PRIO by 15th November, to inform us about the status.**
- If approval *is* needed, this should be sent to relevant authorities as soon as possible (if it hasn't been already). If needed, you can use "Template 2" for this purpose. **Documentation of the actual application/ notification should be forwarded to PRIO by 1st December. If you e.g. have not heard back from your relevant authorities by then, inform PRIO about this.**

Please be aware that it is not PRIO's responsibility to obtain approvals for you, but we are here to coordinate the process, and to forward the required documentation to REA. If there are questions, we remain at your full disposal.

While the rules vary a bit between countries, the following table is a good starting point for deciding if approval is needed:

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

Thank you for your cooperation and best wishes for a nice weekend!

Kind regards,

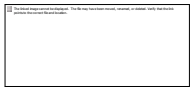
Stine & Bruno

Stine Bergersen

Researcher / Security Research Group Coordinator

Peace Reasearch Institute Oslo (PRIO)

stiber@prio.org / +47 22 54 77 25



Annex 3 – Template for research ethics for DRIVER+ activities (M41- M47)

Within FP7 projects, Special Clause 15 (SC15) regulates the collection and processing of personal data, which means that any research involving personal data is subject to approval by the data protection authorities (DPAs) of the country in which the data is collected.

This template should be filled out by all partners, and returned to PRIO by 15th November 2017

Task leader/ contact person	Description of data collecting activity	Activity starting date	Related task / WP / SP[14]	Is an approval by the relevant data protection authority necessary? (yes[15]/no)	Is a notification to the relevant data protection authority necessary? (yes[16]/no)
E.g. PRIO/ Stine Bergersen	*E.g. interviews, focus groups, questionnaires.*	*E.g. M44*	*E.g. T913.1, WP913, SP91*	*YES*	*YES*
				If "yes", what is the status of this:	**If "yes", what is the status of this:**
				E.g. application for approval sent to the Norwegian Data Protection Authority 03/11/2017. Documentation of this will be sent to PRIO by 1st December 2017.	*E.g. a notification will be submitted to the Norwegian Data Protection Authority shortly. Documentation of this will be sent to PRIO by 1st December 2017.*

[14] If no approval or notification is required for the activities between M41-M47 in a certain WP, a general statement can be made here, such as: "No activities in WPXX are in need of approval/ notification between M41-M47".

[15] If approval is needed, documentation needs to be sent to PRIO by 1st December 2017.

[16] If a notification is necessary, documentation needs to be sent to PRIO by 1st December 2017.

Annex 4 – Documentation supporting Table 3.2

AUTORITEIT
PERSOONSGEGEVENS

Autoriteit Persoonsgegevens
Postbus 93374, 2509 AJ Den Haag
Bezuidenhoutseweg 30, 2594 AV Den Haag
T 070 8888 500 - F 070 8888 501
autoriteitpersoonsgegevens.nl

Ecorys Nederland BV
mw. L.K. Birkman
Watermanweg 44
3067 GG Rotterdam

Datum	Ons kenmerk	Uw brief van
24 november 2017	m00005462	20 november 2017
	Contactpersoon	Uw kenmerk
	070 8888 500	Analyse van adviezen uit interviews, workshops & questionnaires

Onderwerp
Ontvangstbevestiging

Geachte mevrouw Birkman,

De Autoriteit Persoonsgegevens ontving van u een melding van de verwerking van persoonsgegevens.
Uw melding is in onze administratie opgenomen onder meldingsnummer m00005462.
Wij verzoeken u dit meldingsnummer ook in uw eigen administratie op te nemen.

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

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

Hoogachtend,

Mw. S. Ramlakhan
Senior Medewerker Informatiebeheer

CNIL.
8 rue de Vivienne - 75083 PARIS cedex 02
T. 01 53 73 22 22 - F. 01 53 73 22 00
www.cnil.fr

RÉCÉPISSÉ

DÉCLARATION NORMALE

Numéro de déclaration
1620342 v 0

du 04-10-2012

Monsieur BAUMHAUER Christian
ARTTIC SAS
58A RUE DU DESSOUS DES BERGES
75013 PARIS

Organisme déclarant

Nom : ARTTIC SAS

Service :

Adresse : 58A RUE DU DESSOUS DES BERGES

Code postal : 75013
Ville : PARIS

N° SIREN ou SIRET :
344112396 00058

Code NAF ou APE :
7022Z

Tél. : 0153945460
Fax. : 0153945470

Traitement déclaré

Finalité : CONSTITUER UNE COMMUNAUTE D'INTERET AUTOUR DE PROJETS DE RECHERCHE EUROPEENS

La délivrance de ce récépissé atteste que vous avez effectué une déclaration de votre traitement à la CNIL et que votre dossier est formellement complet. Vous pouvez mettre en œuvre votre traitement. Cependant, la CNIL peut à tout moment vérifier, par courrier ou par la voie d'un contrôle sur place, que ce traitement respecte l'ensemble des dispositions de la loi du 6 janvier 1978 modifiée en 2004. En tout état de cause, vous êtes tenu de respecter les obligations prévues par la loi et notamment :

1) La définition et le respect de la finalité du traitement,
2) La pertinence des données traitées,
3) La conservation pendant une durée limitée des données,
4) La sécurité et la confidentialité des données,
5) Le respect des droits des intéressés : information sur leur droit d'accès, de rectification et d'opposition.

Pour plus de détails sur les obligations prévues par la loi « Informatique et libertés », consultez le site internet de la CNIL : « www.cnil.fr »

Fait à Paris, le 4 octobre 2012
Par délégation de la commission

Isabelle FALQUE PIERROTIN
Présidente

Nr ref. WWW 45250415

ZGŁOSZENIE ZBIORU DANYCH DO REJESTRACJI
GENERALNEMU INSPEKTOROWI OCHRONY DANYCH OSOBOWYCH

* [X] zgłoszenie zbioru na podstawie art. 40 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych (Dz. U. z 2002 r. Nr 101, poz. 926 z późn. zm.),
* [ ] zgłoszenie zmian na podstawie art. 41 ust. 2 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych,
* [ ] zgłoszenie zbioru, w którym będą przetwarzane dane określone w art. 27 ust. 1 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych.

Nr
(nadaje urzędnik Biura GIODO)

Część A. Wniosek

Wnoszę o wpisanie zbioru danych osobowych o nazwie:

DRIVER

do Rejestru Zbiorów Danych Osobowych

Część B. Charakterystyka administratora danych

1. Wnioskodawca (administrator danych):

Administrator: ITTI SP. Z O.O.
REGON: 630400909
Miejscowość: POZNAŃ Kod pocztowy: 61-612
Ulica: RUBIEŻ Nr domu: 46 Lokal:
(nazwa administratora danych i adres jego siedziby lub nazwisko, imię i adres miejsca zamieszkania wnioskodawcy oraz nr REGON)

2. Przedstawiciel Wnioskodawcy, o którym mowa w art. 31a ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych:

Przedstawiciel:
Miejscowość: Kod pocztowy:
Ulica: Nr domu: Lokal:
(nazwa przedstawiciela administratora danych i adres jego siedziby lub nazwisko, imię i adres miejsca zamieszkania)

3. Powierzenie przetwarzania danych osobowych:
* [ ] administrator danych powierzył w drodze umowy zawartej na piśmie przetwarzanie danych innemu podmiotowi (art. 31 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych).

W przypadku powierzenia przetwarzania danych innemu podmiotowi, należy podać nazwę adres siedziby lub nazwisko, imię i adres miejsca zamieszkania podmiotu, któremu powierzono przetwarzanie danych osobowych:

* [ ] administrator danych przewiduje powierzenie przetwarzania danych innemu podmiotowi.

4. Podstawa prawna upoważniająca do prowadzenia zbioru danych:
* [X] zgoda osoby, której dane dotyczą, na przetwarzanie danych jej dotyczących,
* [ ] przetwarzanie jest niezbędne do zrealizowania uprawnienia lub spełnienia obowiązku wynikającego z przepisu prawa
* [ ] przetwarzanie jest konieczne do realizacji umowy, gdy osoba, której dane dotyczą, jest jej stroną lub gdy jest to niezbędne do podjęcia działań przed zawarciem umowy na żądanie osoby, której dane dotyczą,

* ☐ przetwarzanie jest niezbędne do wykonania określonych prawem zadań realizowanych dla dobra publicznego - w przypadku odpowiedzi twierdzącej, należy opisać te zadania:

* ☒ przetwarzanie jest niezbędne do wypełnienia prawnie usprawiedliwionych celów realizowanych przez administratorów danych albo odbiorców danych, a przetwarzanie nie narusza praw i wolności osoby, której dane dotyczą.

Część C. Cel przetwarzania danych, opis kategorii osób, których dane dotyczą, oraz zakres przetwarzanych danych

5. Cel przetwarzania danych w zbiorze:

Dane będą zbierane i przetwarzane dla realizacji celów projektu DRIVER (DRiving InnoVation In crisis management for European Resilience).
Dane będą zgromadzone i przetwarzane w celu zarządzaniu uczestnikami Platformy Wschodnioeuropejskiej projektu DRIVER

6. Opis kategorii osób, których dane dotyczą:

Pracownicy podmiotów zaangażowanych w działania związane z zarządzaniem w sytuacjach kryzysowych na terytorium Rzeczpospolitej Polskiej

7. Zakres przetwarzanych w zbiorze danych o osobach:

* ☒ nazwiska i imiona,
* ☐ imiona rodziców,
* ☐ data urodzenia,
* ☐ miejsce urodzenia,
* ☐ adres zamieszkania lub pobytu,
* ☒ numer ewidencyjny PESEL,
* ☐ Numer Identyfikacji Podatkowej,
* ☒ miejsce pracy,
* ☐ zawód,
* ☐ wykształcenie,
* ☐ seria i numer dowodu osobistego,
* ☒ numer telefonu.

8. Inne dane osobowe, oprócz wymienionych w pkt 7, przetwarzane w zbiorze - należy podać jakie:

Adres e-mail

9. Dane przetwarzane w zbiorze:

a) ujawniają bezpośrednio lub w kontekście:

* ☐ pochodzenie rasowe,
* ☐ pochodzenie etniczne,
* ☐ poglądy polityczne,
* ☐ przekonania religijne,
* ☐ przekonania filozoficzne,
* ☐ przynależność wyznaniową,
* ☐ przynależność partyjną,
* ☐ przynależność związkową,
* ☐ stan zdrowia,
* ☐ kod genetyczny,
* ☐ nałogi,
* ☐ życie seksualne,

b) dotyczą:

* ☐ skazań,
* ☐ mandatów karnych,
* ☐ orzeczeń o ukaraniu,
* ☐ innych orzeczeń wydanych w postępowaniu sądowym lub administracyjnym

Jeśli nie zakreślono żadnej odpowiedzi, należy przejść do pkt 11.

10. Podstawa prawna przetwarzania danych wskazanych w pkt 9:

* ☐ osoby, których dane dotyczą, będą wyrażać na to zgodę na piśmie,
* ☐ przepis szczególny innej ustawy zezwala na przetwarzanie bez zgody osoby, której dane dotyczą, jej danych osobowych - w przypadku odpowiedzi twierdzącej, należy podać odniesienie do przepisu tej ustawy:

* ☐ przetwarzanie danych jest niezbędne do ochrony żywotnych interesów osoby, której dane dotyczą lub innej osoby, gdy osoba, której dane dotyczą, nie jest fizycznie lub prawnie zdolna do wyrażenia zgody, do czasu ustanowienia opiekuna prawnego lub kuratora,
* ☐ przetwarzanie jest niezbędne do wykonania statutowych zadań kościoła, innego związku wyznaniowego, stowarzyszenia, fundacji lub innej niezarobkowej organizacji lub instytucji o celach politycznych, naukowych, religijnych, filozoficznych lub związkowych, a przetwarzanie danych dotyczy wyłącznie członków tej organizacji lub instytucji albo osób utrzymujących z nią stałe kontakty w związku z jej działalnością i zapewnione są pełne gwarancje ochrony przetwarzanych danych - w przypadku odpowiedzi twierdzącej należy podać jakich:

* ☐ przetwarzanie dotyczy danych, które są niezbędne do dochodzenia praw przed sądem,
* ☐ przetwarzanie jest niezbędne do wykonania zadań administratora danych odnoszących się do zatrudnienia pracowników i innych osób, a zakres przetwarzanych danych jest określony w ustawie,
* ☐ przetwarzanie jest prowadzone w celu ochrony stanu zdrowia, świadczenia usług medycznych lub leczenia pacjentów przez osoby trudniące się zawodowo leczeniem lub świadczeniem innych usług medycznych, zarządzania udzielaniem usług medycznych i są stworzone pełne gwarancje ochrony danych osobowych,
* ☐ przetwarzanie dotyczy danych, które zostały podane do wiadomości publicznej przez osobę, której dane dotyczą,
* ☐ przetwarzanie jest niezbędne do prowadzenia badań naukowych, w tym do przygotowania rozprawy wymaganej do uzyskania dyplomu ukończenia szkoły wyższej lub stopnia naukowego, a publikowanie wyników badań naukowych uniemożliwia identyfikację osób, których dane zostały przetworzone,
* ☐ przetwarzanie danych jest prowadzone przez stronę w celu realizacji praw i obowiązków wynikających z orzeczenia wydanego w postępowaniu sądowym lub administracyjnym.

Część D. Sposób zbierania oraz udostępniania danych

11. Dane do zbioru będą zbierane:
    * ☒ od osób, których dotyczą,
    * ☐ z innych źródeł niż osoba, której dane dotyczą.

12. Dane ze zbioru będą udostępniane:
    * ☐ podmiotom innym, niż upoważnione na podstawie przepisów prawa.

13. Odbiorcy lub kategorie odbiorców, którym dane mogą być przekazywane - należy podać nazwę i adres siedziby lub nazwisko, imię i adres miejsca zamieszkania odbiorcy danych:

14. Informacja dotycząca ewentualnego przekazywania danych do państwa trzeciego - należy podać nazwę państwa:

Część E. Opis środków technicznych i organizacyjnych zastosowanych w celach określonych w art. 36-39 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych

15. Zbiór danych osobowych jest prowadzony:
    a) * ☒ centralnie,
       * ☐ w architekturze rozproszonej,
    b) * ☐ wyłącznie w postaci papierowej,
       * ☒ z użyciem systemu informatycznego,
    c) * ☒ z użyciem co najmniej jednego urządzenia systemu informatycznego służącego do przetwarzania danych osobowych połączonego z siecią publiczną (np. Internetem),
       * ☐ bez użycia żadnego z urządzeń systemu informatycznego służącego do przetwarzania danych osobowych połączonego z siecią publiczną (np. Internetem).

16. Zostały spełnione wymogi określone w art. 36-39 ustawy z dnia 29 sierpnia 1997 r. o ochronie danych osobowych[1]):
    a) * ☒ został wyznaczony administrator bezpieczeństwa informacji nadzorujący przestrzeganie zasad ochrony przetwarzanych danych osobowych,
       * ☐ administrator danych sam wykonuje czynności administratora bezpieczeństwa informacji,
    b) * ☒ do przetwarzania danych zostały dopuszczone wyłącznie osoby posiadające upoważnienie nadane przez administratora danych

c) * [X] prowadzona jest ewidencja osób upoważnionych do przetwarzania danych,

d) * [X] została opracowana i wdrożona polityka bezpieczeństwa,

e) * [X] została opracowana i wdrożona instrukcja zarządzania systemem informatycznym,

f) inne środki, oprócz wymienionych w ppkt a - e, zastosowane w celu zabezpieczenia danych:

Środki ochrony fizycznej danych:

- ✓ Zbiór danych osobowych przechowywany jest w pomieszczeniu zabezpieczonym drzwiami zwykłymi (niewzmacnianymi, nie przeciwpożarowymi).
- ✓ Dostęp do pomieszczeń, w których przetwarzany jest zbiory danych osobowych objęte są systemem kontroli dostępu.
- ✓ Dostęp do pomieszczeń, w których przetwarzany jest zbiór danych osobowych jest w czasie nieobecności zatrudnionych tam pracowników nadzorowany przez służbę ochrony.
- ✓ Zbiór danych osobowych w formie papierowej przechowywany jest w zamkniętej niemetalowej szafie.
- ✓ Kopie zapasowe/archiwalne zbioru danych osobowych przechowywane są w zamkniętej metalowej szafie.
- ✓ Pomieszczenie, w którym przetwarzane są zbiory danych osobowych zabezpieczone jest przed skutkami pożaru za pomocą systemu przeciwpożarowego i/lub wolnostojącej gaśnicy.
- ✓ Dokumenty zawierające dane osobowe po ustaniu przydatności są niszczone w sposób mechaniczny za pomocą niszczarek dokumentow.

Środki sprzętowe infrastruktury informatycznej i telekomunikacyjnej:

- ✓ Zastosowano urządzenia typu UPS, generator prądu i/lub wydzieloną sieć elektroenergetyczną, chroniące system informatyczny służący do przetwarzania danych osobowych przed skutkami awarii zasilania.
- ✓ Dostęp do zbioru danych osobowych, który przetwarzany jest na wydzielonej stacji komputerowej/ komputerze przenośnym zabezpieczony został przed nieautoryzowanym uruchomieniem za pomocą hasła BIOS.
- ✓ Dostęp do systemu operacyjnego komputera, w którym przetwarzane są dane osobowe zabezpieczony jest za pomocą procesu uwierzytelnienia z wykorzystaniem identyfikatora użytkownika oraz hasła.
- ✓ Zastosowano systemowe mechanizmy wymuszający okresową zmianę haseł.
- ✓ Zastosowano system rejestracji dostępu do systemu/zbioru danych osobowych.
- ✓ Zastosowano środki kryptograficznej ochrony danych dla danych osobowych przekazywanych drogą teletransmisji.
- ✓ Dostęp do środków teletransmisji zabezpieczono za pomocą mechanizmów uwierzytelnienia.
- ✓ Zastosowano macierz dyskową w celu ochrony danych osobowych przed skutkami awarii pamieci dyskowej.
- ✓ Zastosowano środki ochrony przed szkodliwym oprogramowaniem takim, jak np. robaki, wirusy, konie trojańskie, rootkity.
- ✓ Użyto system Firewall do ochrony dostępu do sieci komputerowej.

Środki ochrony w ramach narzędzi programowych i baz danych:

- ✓ Wykorzystano środki pozwalające na rejestrację zmian wykonywanych na poszczególnych elementach zbioru danych osobowych.
- ✓ Zastosowano środki umożliwiające określenie praw dostępu do wskazanego zakresu danych w ramach przetwarzanego zbioru danych osobowych.
- ✓ Dostęp do zbioru danych osobowych wymaga uwierzytelnienia z wykorzystaniem identyfikatora użytkownika oraz hasła.
- ✓ Zastosowano systemowe środki pozwalające na określenie odpowiednich praw dostępu do zasobów informatycznych, w tym zbiorów danych osobowych dla poszczególnych użytkowników systemu informatycznego.
- ✓ Zastosowano mechanizm wymuszający okresową zmianę haseł dostępu do zbioru danych osobowych.
- ✓ Zastosowano kryptograficzne środki ochrony danych osobowych.
- ✓ Zainstalowano wygaszacze ekranów na stanowiskach, na których przetwarzane są dane osobowe.
- ✓ Zastosowano mechanizm automatycznej blokady dostępu do systemu informatycznego służącego do przetwarzania danych osobowych w przypadku dłuższej nieaktywności pracy użytkownika.

Środki organizacyjne:

- ✓ Osoby zatrudnione przy przetwarzaniu danych zostały zaznajomione z przepisami dotyczącymi ochrony danych osobowych.
- ✓ Przeszkolono osoby zatrudnione przy przetwarzaniu danych osobowych w zakresie zabezpieczeń systemu informatycznego.
- ✓ Osoby zatrudnione przy przetwarzaniu danych osobowych obowiązane zostały do zachowania ich w tajemnicy.
- ✓ Monitory komputerów, na których przetwarzane są dane osobowe ustawione są w sposób uniemożliwiający wgląd osobom postronnym w przetwarzane dane.
- ✓ Kopie zapasowe zbioru danych osobowych przechowywane są w innym pomieszczeniu niż to, w którym znajduje się serwer, na którym dane osobowe przetwarzane są na bieżąco.

Część F.

Informacja o sposobie wypełnienia warunków technicznych i organizacyjnych, o których mowa w rozporządzeniu Ministra Spraw Wewnętrznych i Administracji z dnia 29 kwietnia 2004 r. w sprawie dokumentacji przetwarzania danych osobowych oraz warunków technicznych i organizacyjnych, jakim powinny odpowiadać urządzenia i systemy informatyczne służące do przetwarzania danych osobowych (Dz. U. Nr 100, poz. 1024)

17. Zastosowano środki bezpieczeństwa na poziomie[2]:
    * ☐ podstawowym,
    * ☐ podwyższonym,
    * ☒ wysokim,

Objaśnienia:
* *W przypadku odpowiedzi twierdzącej należy zakreślić kwadrat literą "X".*
1) *Administrator danych prowadzący zbiór w systemie tradycyjnym (papierowym) zobowiązany jest do zastosowania środków określonych w pkt 16 ppkt a-d, a w przypadku prowadzenia zbioru w systemie informatycznym, ponadto środka określonego w pkt 16 ppkt e.*
2) *Należy wskazać odpowiedni poziom bezpieczeństwa określony w § 6 ww. rozporządzenia (UWAGA! Dotyczy wyłącznie administratorów przetwarzających dane w systemie informatycznym);*
   – *jeżeli wnioskodawca przetwarza dane wymienione w pkt 9 zgłoszenia, należy zastosować środki bezpieczeństwa przynajmniej na poziomie podwyższonym;*
   – *w przypadku, gdy przynajmniej jedno urządzenie systemu informatycznego służącego do przetwarzania danych osobowych połączone jest z siecią publiczną, należy zastosować środki bezpieczeństwa na poziomie wysokim;*
   – *w pozostałych przypadkach wystarczające jest zastosowanie środków bezpieczeństwa na poziomie podstawowym.*

.....
(data, podpis i pieczęć wnioskodawcy)

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* ☒ Oświadczam, iż rezygnuję z doręczania pism za pomocą środków komunikacji elektronicznej zgodnie z art. 39[1] paragraf 1d Kodeksu postępowania administracyjnego (Dz. U. 2013 poz. 267 z późn. zm.).