

Information sheet with regards to data processing for NEGEM - (Privacy Notice)

In accordance with EU General Data Protection Regulation (2016/679, “GDPR”) and applicable national legislation.

Name and duration of the research

Name of the research: ‘Quantifying and Deploying Responsible Negative Emissions in Climate Resilient Pathways’ — ‘NEGEM’

Duration of the research: June 2020 – May 2024

Controller(s), data protection officer(s) and contact person(s)

The data protection officer (DPO) is in charge to provide you more information about how the data is stored, used and deleted in the project course. The Coordinator of the NEGEM project, VTT Technical Research Centre of Finland Ltd, has appointed a regular Data Protection Officer (DPO), appointed as the DPO of NEGEM. Each partner of NEGEM has identified a reference person (DPO of the organization or contact person of the research) with whom the NEGEM DPO will interact, whenever needed. You can also contact the person who is responsible of the research to get help to your questions. Accordingly, the persons appointed are listed below:

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Joint controller responsibilities

As a key principle in protection of personal data, NEGEM consortium aims at minimisation of collecting any personal data as part of research conducted in different Work Packages. As a guideline for any project activities, only in cases when result data is totally anonymised and needed by other participants for research work in NEGEM, it is shared in the common NEGEM workspace (Microsoft Teams) managed by VTT during the project.

In the NEGEM project, all partners form a joint controllership basing on: Where the Controllers defined in previous section process the same personal data and jointly determine the purposes and means of processing, these Controllers are joint controllers.

A data subject may exercise his/her rights concerning processing of personal data by contacting the before mentioned DPOs or contact persons (see previous chapter). This contact person shall transfer the matter to other concerned Controllers, as needed.

Categories of personal data and purpose and legal basis of data processing

The NEGEM project consists of several types of research divided in ten WPs. The following research methods have been identified relevant from the viewpoint of protection of personal data:

- Interviews
- Surveys
- Workshops – face-to-face or by different software applications such as GoToMeeting or Teams

The parts of NEGEM studies applying above listed methods collect different types of personal data, and they have also their own purposes and legal basis of data processing (see Table below). Particularly, NEGEM interviews and surveys are included in “WP5: Public and stakeholder assessment” led by UCAM. Workshops are included in “WP6: European and International Governance” led by Bellona and CMW, “WP8: Vision and framework for pathways analysis” led by VTT as well as “WP9: Stakeholder engagement, outreach and dissemination” run by ETA.

All studies collect different types of personal data, and they have also their own purposes and legal basis of data processing (see Table below)



Type of research method	Collected personal data	Purpose of personal data processing is to ensure that project's aims and results will be achieved by:	Legal basis of processing ¹	Data Sources for personal data	WP leader, Data controller and data processing partners
Interviews	Name, e-mail, organization, work status	Interviewing stakeholders of NEGEM project	Public interest, scientific or historical research purposes or statistical purposes under legislative safeguard measures ² .	Data subjects	WP5 UCAM
Stakeholder surveys and expert elicitations	Name, e-mail, organization, work status	Collecting data from stakeholders of NEGEM project	Public interest, scientific or historical research purposes or statistical purposes under legislative safeguard measures ² .	Data subjects	WP5 UCAM
Public surveys	The special categories of personal data collected may include political opinions and philosophical beliefs but all personal information will be anonymized by the market research responsible for data collection.	Collecting data from members of the public to provide a better understanding or social license to operate and public acceptability in several European countries	Public interest, scientific or historical research purposes or statistical purposes under legislative safeguard measures ³ .	Data subjects	WP5 UCAM RUG
Workshops	Name, e-mail, organisation	Enabling NEGEM project activities and engagement of stakeholders in co-design and co-creation of outputs	Public interest, scientific or historical research purposes or statistical purposes under legislative safeguard measures ² .	Data subjects, Project partners Colloquiums; call via project partners, snowball collection, registration via internet	WP6, WP8, WP9 BELLONA CMW VTT ETA

¹ GDPR Art. 6.

² GDPR Art. 89(1).

³ GDPR Art. 9(2)(j) and Art. 89(1).



Data sources

Personal data is received from the data subjects from surveys, interviews, stakeholder workshops, online co-creation, research colloquium and case study exercises. Interviews or workshops may be voice recorded. Photographs are used for dissemination purposes only if a written or oral consent is provided. No person unable to give informed consent as well as minors and children will take part in research activities.

Data regarding social media is included in the work of ETA, the partner leading WP9, “Stakeholder engagement, outreach and dissemination”. The NEGEM project website includes a web page on Legal issues (Copyright, Privacy Policy and Disclaimer), explaining how NEGEM is going to use the information from web users (e.g. when they subscribe online to newsletters, email alerts, etc.) as well as website links to social media channels, including the data protection provisions with used social media channels.

Recipients or categories of recipients

Personal data is collected and stored by NEGEM -project partners identified in the Horizon2020 Grant Agreement, No 869192.

Transfers outside the European Union or the European Economic Area

Personal data is not transferred outside the European Union and the European Economic Area GDPR applies across all of the EEA (including Norway and Switzerland). Also, there will be a UK GDPR that will come into force from the beginning of 2021⁴.

Automated decision making

NEGEM project does not carry any automated decision making.

Retention period of personal data after the research

Personal data is destroyed 3-6 month after the research when the EU review of the project is done.

Protection principles

In performance of research, research data is pseudonymised right after the collection of the data, and anonymized after the data is analysed.

Manually processed personal data is protected with a restricted access to Data Controllers premises.

⁴ <https://ico.org.uk/for-organisations/data-protection-at-the-end-of-the-transition-period/data-protection-at-the-end-of-the-transition-period/the-gdpr/>



Personal data processed in the main data stored Microsoft Teams managed by VTT is protected with username, password, multi-factor authentication (MFA), user monitoring (log) and access control.

Rights of the data subjects

As a participant of the NEGEM study (i.e. data subjects) you will have the following general rights, where however can be some restrictions or exemptions that are considered for each case separately.

The rights are available below. If you feel unsure, you can contact DPO or research contact person, and ask more about them.

Right to withdraw consent

If the processing is based on consent, the data subjects have the right to withdraw their consent on which the processing is based on. This shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access

The data subjects have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed and access to his or her personal data and information concerning the processing of his or her personal data.

Right to rectification

The data subjects have the right to obtain from the controller rectification of inaccurate personal data concerning him or her. The data subjects have the right to have incomplete personal data completed.

Right to erasure

The data subjects have the right to obtain from the controller the erasure of personal data concerning him or her i.e. if (i) the personal data is no longer necessary in relation to the purposes for which they were collected or otherwise processed; (ii) the data subject withdraws consent on which the processing is based and where there is no other legal ground for processing; (iii) the personal data have been unlawfully processed; (iv) the personal data have to be erased for compliance with a legal obligation in European Union or national law.

Right to restriction of processing

The data subjects have the right to obtain from the controller restriction of processing.

Right to object

The data subjects have the right to object to processing of personal data concerning him or her.

Right to data portability

Where the processing is based on the data subject's consent and carried out by automated means, the data subjects have the right to receive the personal data concerning him or her, which he or she has provided to the Controller.



Right to lodge a complaint with a supervisory authority

The data subjects have a right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data breaches the data subject's rights pursuant to applicable law.

In Austria: Österreichische Datenschutzbehörde, Hohenstaufengasse 3, 1010 Wien, dsb@dsb.gv.at

In Belgium: Autorité de la protection des données (APD-GBA), Rue de la Presse 35, 1000 Bruxelles, Belgium, contact@apd-gba.be

In Finland: Finnish Data Protection Ombudsman, Ratapihantie 9, 00520 Helsinki, P.O. Box 800, 00521 Helsinki, Finland, tietosuoja@om.fi

In France, Commission Nationale de l'Informatique et des Libertés – CNIL, 8 rue Vivienne, CS 30223, F-75002 Paris, Cedex 02

In Germany: Die Bundesbeauftragte für den Datenschutz und die Informationsfreiheit, Husarenstraße 30, 53117 Bonn, Germany, poststelle@bfdi.bund.de

In Netherlands: Autoriteit Persoonsgegevens, Prins Clauslaan 60, P.O. Box 93374, 2509 AJ Den Haag/The Hague, info@autoriteitpersoonsgegevens.nl

In Italy: Garante per la protezione dei dati personali, Piazza Venezia 11 - 00187 Roma, Italy, protocollo@gpdp.it

In Norway: Norwegian Data Protection Authority (Datatilsynet), PO Box 458 Sentrum, 0105 Oslo, Norway, postkasse@datatilsynet.no

In Sweden: Datainspektionen, Drottninggatan 29, 5th Floor, Box 8114, 104 20 Stockholm, datainspektionen@datainspektionen.se

In Switzerland, Office of the Federal Data Protection and Information Commissioner FDPIC, Feldeggweg 1, CH - 3003 Berne

In United Kingdom: The Information Commissioner's Office, Water Lane, Wycliffe House, Wilmslow – Cheshire SK9 5AF, international.team@ico.org.uk

