



**GRETA**  
GREEN  
ENERGY  
TRANSITION  
ACTIONS

# D8.6

## Ethics and Privacy Management Plan

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## Disclaimer and acknowledgement

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## Executive summary

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This Ethics and Privacy Management Plan is prepared in the context of WP8 – Project Coordination (Task 8.4, Data, Ethics, and Privacy management) – of the GRETA project under Grant Agreement No. 101022317.

GRETA aims at producing rich, actionable insights to support the design of EU policies that more effectively engage citizens in the ongoing energy transition. To achieve such a goal, GRETA aspires to understand the structural factors and dynamics that affect the emergence of energy citizenship and the generalized lack of understanding of this phenomenon.

GRETA activities include stakeholder engagement, data management, and result dissemination in six case studies located in five different European countries and a complementary EU-wide citizen survey which raise ethical and privacy issues due to the involvement of human end-users.

This report summarizes the key ethical and privacy requirements and guidelines that must be applied in the project's research activities to safeguard individual participants' dignity and comply with national and European regulations. For this reason, these guidelines were written in accordance with H2020 guidelines on ethics, responsible research, data protection and current best practices, some of them drawn from past experiences of the project team.

## Project information

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## Abbreviations and acronyms

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DoA	Description of Action
DPO	Data Protection Officer
EEAB	External Expert Advisory Board
E-COM	Executive Committee
GDPR	General Data Protection Regulation
PC	Project Coordinator
WP	Work Package

# 1 Introduction

The GRETA project will collect, process, and analyse data from a number of sources. For this reason, these strict ethics and privacy procedures must be put in place to safeguard individual participants and comply with national and European regulations.

Quantitative and qualitative data will be gathered from six case studies encompassing a wide range of end-user engagement practices and socio-demographic, socio-technological, socio-political (including institutional) and geographic preconditions that might inhibit or enable the emergence of energy citizenship.

The case studies will be complemented with an EU-wide citizen survey to quantitatively test correlations between diverse identified factors and levels of engagement. This data will be georeferenced to enable a geographical (country/region) level analysis.

Table 1 summarizes the partners' involvement in activities encompassing ethical and privacy issues, according to the DoA, thus highlighting the fact that there is broad responsibility for such activities.

Table 1: Partner involvement in activities encompassing ethical and privacy issues.

Partner	Responsibility
TNO	Leader of WP1 and in charge of analysing data of the EU-wide survey Leader of a specific case study
VPS	Leader of WP3 and responsible for the case study work Leader of a specific case study
UNIBO	Leader of WP5 and responsible for the analysis on Pathways and Contracts Leader of a specific case study
FhG	Leader of WP6 and responsible for WP6 workshops Leader of a specific case study
LUT	Project coordinator and responsible for WP2 workshops
TEC	Leader of a specific case study

## 1.1 Objectives of the deliverable

The main goal of this deliverable is to define a set of ethical and privacy requirements and guidelines that must be applied in the project's research activities to safeguard individual participants' dignity and comply with national and European regulations.

These guidelines were written in accordance with H2020 guidelines and current best practices, some of them drawn from past experiences of the project team.

The report deals first with ethical issues and only next with privacy issues although there is some overlap between these two topics. Likewise, these topics are closely related with the general data management issues described in *D8.5 – Data Management Plan*.

## 2 Ethical requirements and guidelines

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GRETA will develop research work in six case studies located in five European countries (Germany, Italy, the Netherlands, Portugal, and Spain). A complementary EU-wide citizen survey will also be carried out.

GRETA activities including stakeholder engagement, data management, and result dissemination will be conducted in accordance with pertinent national and European regulations as well as H2020 recommendations and guidelines related to ethics and responsible research and innovation (EU Grants, 2021) (RRI-Tools Project, 2016).

The project partners involved with end-users are well trained and have considerable expertise in dealing with this kind of research involving people. Thus, each partner will identify a qualified researcher to ensure the correct management of the data collection and management procedures. Moreover, the project's Executive Committee (E-COM) is responsible for guaranteeing that all the consortium members abide to lawful and ethical procedures during the development of the project. In more detail, the following guidelines will be enforced:

- No laboratory or experimental research involving humans or animal will be conducted;
- No harm to the environment, animals, or plants will derive from the project activities;
- The engagement of external stakeholders (in particular, the participants in each case study or the general survey) will follow a rigorous process that will seek to obtain an informed consent to collect and manage their personal data; furthermore, all interaction with human participants will be reviewed by an ethical committee (e.g. Ethical committee of LUT University);
- The participants will be free to join or leave the project and will not receive any financial compensation or suffer any loss;
- All activities are conducted insuring respect for the participants and their dignity, protecting their values, cultures, rights, and interests;
- Gender equality will be promoted in all activities including stakeholder engagement and the selection of governing boards;
- The final results of the project will be openly accessible.

As a final note, all stakeholder workshop activities, surveys, and interviews will be conducted with cognitively unimpaired adults over the age of 18. GRETA may however work within vulnerable populations such as those who are facing economic hardship, such that they might be experiencing energy poverty. GRETA partners have prior experience on working within such communities and will utilize this expertise to ensure good ethical practice is followed.

## 3 Privacy requirements and guidelines

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As previously mentioned, GRETA data collection will have to include personally identifiable information in order to fulfil its goals. For this reason, data processing must comply with the EU's General Data Protection Regulation 679/2016 (GDPR) firstly published by the European Parliament and the Council and now transposed and enforced on all European countries (European Commission, 2016).

In this regard, the end-users participating in any of the six case studies, in the EU-wide survey, or in other activities that involve data collection will be asked to sign a consent form prepared in accordance with GDPR principles (see Annex 1). This form will be tailored for each appropriate activity (e.g., survey, interview, or metering data access), adapted to comply with any specific national regulation, and translated. Consortium partners are required to keep a copy of all consent forms, securely, on file for the duration of the project.

The consortium members will make sure to give any participant the information on the purpose of the data collected, who will benefit from their involvement, and what are the risks/burdens incurred, before trying to obtain the informed consent in all the workshops, interviews, and surveys.

The issues and questions related with GDPR at project level will be overseen by a Data Protection Officer (DPO) nominated by the Project Coordinator (PC). Since project coordination is based in Finland, TENK guidelines on research integrity and ethics will be followed in complement of GDPR related data issues (TENK, 2019).

### 3.1 Data collection

As stated, any end-user will be informed of the benefits and risks incurred when accepting to participate in any of the project's activity especially when (personal) data collection is required. In this process the following guidelines will be followed:

- All the participants will be volunteers;
- The engagement of the participants in each case study will be organized by the responsible consortium partner under the guidance of the PC, if requested, but no contact information will be shared without previous consent;
- The PC will also be responsible for selecting a third party to carry out the general survey that can comply with European legislation and the project guidelines;
- Anonymization or pseudo-anonymization techniques should be used whenever possible to guarantee the highest level of privacy from the outset of data collection and data sharing;

- The participants will be free to leave the project or change their data collection preferences at any point either by contacting the responsible consortium member or the DPO contact included on the consent form and the website;
- Personal contact information (e.g., email, address) will not be published or made available to external individuals or organizations;
- In some particular situations, the participants might be asked for permission for some identification data (e.g., name or surname) to be published on a report or a post;
- Inaccurate or outdated personal data can be corrected by specific request to an individual participant (e.g., through emails);
- Personal data collected in EU will not be transferred to entities in non-EU countries; on the other hand, no person living outside EU is expected to be involved in the project;
- Data will not be used for any secondary use without the explicit and informed consent;
- Consent will be sought from the member of the External Expert Advisory Board (EEAB) before their name and organization are included in any report, post, or the website.

### 3.2 Data storage

Data collected and generated by the project will be stored in repositories implemented on secure platforms. Raw data and data containing personal identifiable information (e.g., from the interviews and workshops) will be stored on repositories with restricted access to project members only, preferably, the main project repository.

The main project outputs (public deliverables, research papers, and technical reports) will be deposited into a curated repository, GRETA Open Portfolio for Civic Energy Empowerment.

In addition, the following guidelines will be followed:

- All the repositories will have secure authentication mechanisms;
- All the repositories will have a backup plan to prevent data loss.

A more detailed description of the project data repositories' organization, use, and accessibility can be found in *D8.5 - Data Management Plan*. It is worth noting that this plan will be yearly updated.

### 3.3 Data destruction

In compliance with GDPR rules, personal data will not be stored for a longer period than is necessary for its purpose or required by contract or law. All personal data will be stored for five years after the end of the research project.

As stated in the consent form, any participant has the right (of portability) to require a transfer of the data provided in the course of the project to another service provider in a commonly used electronic format. In this situation, the data is deleted from the project repositories.

### 3.4 Data security

As mentioned, data collected and generated will be stored on secure repositories managed in accordance with current best practices.

In particular, personal contact information (e.g., email, address) will not be published or posted. Moreover, this information will not be provided or be accessible to external individuals or organizations.

To assure a high level of privacy, anonymization or pseudo-anonymization techniques should be used as soon as possible in data collection, processing, or sharing.

Cybersecurity issues related with the installed energy management systems (e.g., smart meters and PV systems) are considered to be outside the scope of the project and handled by the appropriate managing entity.

## 4 Health and safety requirements

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GRETA activities will not have any direct impact on the environment or human participants. Likewise, no equipment deployment or removal will take place. In this sense, no health and safety issues can be identified for the staff and participants involved in each case study.

## 5 Conclusions

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This Ethics and Privacy Management Plan defines a set of ethical and privacy requirements and guidelines that must be applied in GRETA's research activities to safeguard individual participants' dignity and comply with national and European regulations. These guidelines were written in accordance with H2020 guidelines and current best practices, some of them drawn from past experiences of the project team.

GRETA activities include stakeholder engagement, data management, and result dissemination in six case studies located in five different European countries and a complementary EU-wide citizen survey which raise ethical and privacy issues due to the involvement of human end-users.

This plan comprises ethical requirements and guidelines, privacy requirements and guidelines, and notes on health and safety requirements. The topics are closely related with the general data management issues described in *D8.5 – Data Management Plan*.

## References

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European Commission. (2016). 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 (GDPR). *OJ L 119*, 1-88. Retrieved from <http://data.europa.eu/eli/reg/2016/679/oj>

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TENK (Finnish National Board on Research Integrity). (2019). *The ethical principles of research with human participants and ethical review in the human sciences in Finland*. Publications of the Finnish National Board on Research Integrity 3/2019. 2nd, revised edition. Retrieved from <https://tenk.fi/en/advice-and-materials/guidelines-ethical-review-human-sciences>

## Annex 1. GRETA's consent form

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This form can be tailored depending on the intended activity (e.g., survey, interview, or metering data access), adapted to comply with any specific national regulation, and translated, including a signature page.

If required, this form can be provided as a paper document or an online form, as should be the case for the participants in the EU-wide survey.

Consortium partners are required to keep a copy of all consent forms, securely, on file for the duration of the project.



## Information on the processing of personal data

pursuant to art. 13 of Regulation (EU) 2016/679

You are invited to participate in a study that [indicate the objective of the research] carried out in the [indicate the Department], in collaboration with [indicate, if applicable, any bodies or third parties collaborating with the research].

Innovation in green energy solutions and their usage play a key role in climate change mitigation. Energy citizenship refers to active public participation in clean energy transition, for example through behavioural change and renewable energy adoption, the collective effect of which could lead to significant carbon emissions' reduction. Unfortunately, there are many barriers to energy citizenship. The EU-funded GRETA project will conduct research to develop models and frameworks that reveal factors impacting both individual and collective energy citizenship actions. The results will be utilised not only for developing energy citizenship contracts that support the transition goals within energy communities but also for producing recommendations aimed at improving the policy-making process towards stimulating energy citizenship.

Pursuant to art. 13 of Regulation (EU) 2016/679 (General Data Protection Regulation), please note that [project GRETA/partner organisation] is the Data Controller and will process your personal data in compliance with the requirements of Regulation (EU) 2016/679 (General Data Protection Regulation) and Decree 196 dated 30 June 2003 as amended (Data Protection Code).

### PARTIES INVOLVED IN PROCESSING

#### Data Controller

[add information about the partner organisation or the project depending on who is the data controller]

#### Data Protection Officer of GRETA

Anne Himanka  
Project GRETA, Data Protection Officer  
dataprotection@lut.fi

### PURPOSES AND METHODS OF PROCESSING

Your personal data and, in particular, the data relating to [specify the type of data processed, depending on the characteristics of the study], will be processed by specifically authorised persons,



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both with and without the use of automated equipment, for the following purposes:

### (A) PARTICIPATION IN THE RESEARCH AND RELATED OPERATIONS AND ACTIVITIES

If you give your consent to participate in the study in question, some of your personal data will be collected through:

- survey,
- online survey [accessible at the address [www.indicateLink.it](http://www.indicateLink.it)],
- focus groups,
- interview that will be sound recorded/filmed.

Information you will provide will be processed by [...], which will replace any identification data with a code. Please note that your data will be subject to anonymisation only after ... [indicate the maximum period within which the data will be anonymized], since, over the period of time, [1 - You will be asked to answer a further questionnaire [or interview, or participate to a focus group] that will be compared and elaborated also in the light of the answers already provided. [2 - it is in the interest of the project to be able to contact you again in order to deepen some aspects of the research or ask for clarifications on [...]] [3 - it is in the interest of the project to be able to contact you again if you have expressed the will to participate in [...]]

The data will be collected without identifying data (example: name, surname, etc.); however, in particular circumstances, the registration of the IP address through the software used for the survey and/or the answer given to some questions (for example in the case in which your age or origin are suitable to identify you) could lead to the possibility of indirectly bring back to you the answers provided. It should be noted, however, that for no reason the data will be processed by authorized personnel (e.g.: scientific manager and other researchers) with the aim of proceeding to the mere identification of the participant.

Personal data without identification details may also be communicated to third parties for research purposes. In particular, the data may be communicated to [indicate any partners involved in the research project, specifying the activities / purposes pursued by any other partner within the study in the epigraph].

The processing may also have as object some of your images (photographs, video recordings, audio-video recordings). The processing of these images will take place in compliance with the provisions of the law, guaranteeing, in all cases where this is possible, anonymity by obscuring the physical features. We would like to point out that, for the processing of images, you are required to express a specific consent, considering that, even in special cases, also images related to people whose face has been obscured may allow their identification.

The data collected and stored for the realization of the study in question, will be kept for [indicate storage times].

[If there is a transfer abroad, enter the following paragraph, otherwise remove it]



## (A1) INFORMATION CONCERNING THE TRANSFER ABROAD TO NON-EU TERRITORY

Your personal data may be transferred, without your identification, to a Country not belonging to the European Union or to an international organization; in particular, they will be transferred to [insert identification details of the recipients].

...

[Indicate whether personal data will be disseminated and in what way]

## (A2) INFORMATION CONCERNING THE DISSEMINATION

Examples:

- 1) It should be noted that the data will be disseminated only in strictly anonymous form, for example through scientific publications, statistics and scientific conferences.
- Or
- 2) We would like to point out that, if the interview, in any case without identification data, turns out to be socially valuable and usable for ..., this could be - with your consent - the subject of communication and/or dissemination. It should be noted that the communication or disclosure of the data described above will take place, with your consent, only after an assessment of the relevance and not excess of the treatment with respect to the purposes of collection or if the failure to publish what emerged in the interview negatively affects the quality of the research/study. The recording of the interview and/or the transcription of the content, in any case without identification data, could be communicated to the project partners and be the object of dissemination/publication (e.g. in scientific journals, internet, databases accessible to other researchers, repository of institutional or disciplinary data, i.e. information systems for document management managed by individual research institutions or by associations and consortia of research bodies for a particular scientific community, in which data and their meta-information are securely stored and reliable enough to guarantee its authenticity and inalterability and distributed to the public in a free and open form, etc.).
- Or
- 3) If you are a known person or if you exercise a public function in a particular role or position, it could be of public interest or socially appreciable to let third parties know the information that emerged from the interview concerning the institution or role that You represent (for example, including your name and surname). You may therefore request that your identification data be processed and disseminated for the following purposes:
    - 4) - for the purpose of allowing the processing and dissemination of information which, due to the nature of your role, allow researchers to discover, interpret and review theories, facts and behaviours relating to the field of knowledge on the aforementioned topics;
    - 5) - filing of project documents, containing your data, on repository of institutional or disciplinary data;
- so that the information you provide will contribute to the formation of public opinion on your opinions and/or facts relevant to the community.
- The images may be disseminated pursuant to Law n. 150/2000, "Discipline of information and communication activities of public administrations", on institutional sites as well as through social network channels (by way of example but not exhaustive, Facebook, Twitter, Youtube).



Finally, it is specified that your consent to the communication and / or dissemination of your interview implies the granting of a non-exclusive license, without limits of duration and for the whole world, transferable to third parties, for the use of images. This license includes the rights pursuant to articles 12 et seq. of the law n. 633/1941, including by way of example but not exhaustive: right of publication; right of reproduction in any way or form; right of transcription, assembly, adaptation, processing and reduction; right of communication and distribution to the public, including the rights of projection, transmission and dissemination (purely by way of example through iptv, mobile terminals, voip, digital channels, etc.), also in a summary and/or reduced version, with any technical means, the right to keep a copy of the images, even in electronic form and on any known or future technological support for the purposes and within the limits defined above. The use of images does not give right to any compensation. In any case, any use of the portrait that could harm the honour, reputation or decorum of the person portrayed, shot or recorded is excluded.

## (B) DATA STORAGE FOR FUTURE RESEARCH ACTIVITIES

Considering that new discoveries could indicate unprecedented research opportunities for researchers or allow further studies and research on particular data for the study in question, you may allow prolonged storage of your data in a non-anonymous form for a period of time to [indicate the period of data retention for further research activities] from the conclusion of this study for possible future research activities and, if necessary, to contact you again to let you express, if it deems it, a new specific consent for a new research.

If, on the other hand, you refuse to consent to the processing described herein, your data will be deleted or made anonymous immediately upon expiry of the storage term indicated in point (A).

## (C) CONSERVATION FOR ADMINISTRATIVE PURPOSES

Your data will also be processed for administrative accounting purposes and kept for the time strictly necessary for the pursuit of these purposes, except for the ten-year period to ensure the fiscal, accounting and administrative requirements required by law and, possibly, longer terms, not determinable a priori, as a consequence of different conditions of lawfulness of the treatment (for example, legal actions that make the treatment necessary for over ten years).

## LEGAL BASIS AND NATURE OF THE PROVISION DATA

The legal basis of the treatments referred to in point (A) described above lies in the consent, pursuant to art. 6, first paragraph, lett. a) of the Regulation (EU) 2016/679 (General Regulation on Data Protection) and, in the case of special categories of personal data, of art. 9, second paragraph, lett. a) of Regulation (EU) 2016/679. The consent to the processing for the purposes described above is optional.

However, it is specified that the provision of data for the purposes referred to in points (A) and (A1) is not mandatory but is essential for the achievement of the purposes described. The refusal to grant them will not allow you to participate in the study in question.

The provision of data for the purposes referred to in point (B) is optional, not deriving from a regulatory obligation, but it is necessary to allow data to be stored for a longer period than that provided for the conclusion of the present study for possible future research activities and, if necessary, to contact you again to let you express, if it deems it, a new specific consent for a new



research. Failure to provide the data for these purposes will have the sole consequence of being unable to implement the last described.

The provision of data for the purposes referred to in point (C) is necessary to comply with legal obligations regarding the conservation of administrative and accounting documents. In this case the legal basis can be found in the art. 6, paragraph 1, lett. c) and e), of Regulation (EU) 2016/679.

## RIGHTS OF THE DATA SUBJECT

Without prejudice to the limitations placed on exercise of the rights of data subjects by arts. 2-undecies and 2-duodecies of the Data Protection Code (Decree 196/03), you, as a participant in this study and therefore a data subject, may exercise the rights granted pursuant and consequent to arts. 15-21 of the Regulation, including the right to request access to your personal data and its rectification or erasure, as well as to restrict the processing of your data, object to its processing and request its portability.

Please note that any consent given by you is given freely and may be revoked at any time, without any penalties or adverse effects, and without prejudicing the lawfulness of processing based on the consent given prior to revocation.

Requests to exercise the above rights may be presented to [project GRETA at [dataprotection@lut.fi](mailto:dataprotection@lut.fi)]

Lastly, should you believe that the processing of your personal data is in infringement of the provisions of Regulation (EU) 2016/679 or Decree 196/03 and subsequent amendments and additions, you have the right to lodge a complaint with [add information on the local data protection authority, for example: the Italian data protection authority (known as the "Garante per la protezione dei dati personali"), pursuant to Article 77 of the Regulation (UE) 2016/679, or to refer to the appropriate courts (art. 79 of the Regulation).]