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Ethics plan

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Executive summary

In this document, the project activities which could raise some ethical issues are identified and the protocols which need to be followed to prevent them are described. In particular, activities involving data protection such as obtaining information about users' behaviour, requiring the consent of users to assess building energy performance or accessing Energy Performance Certifications to carry out large scale statistical analysis. With this purpose, the report includes a review of the EU and national legislation in the partners' countries, and a provision of the general data protection regulations to be considered. Finally, the measures to be adopted by each beneficiary to safeguard personal data and the names of the data protection officers appointed by each beneficiary are provided.

A template for a consent form to be filled by the participants in the project research activities is included in the Annex.

Disclaimer

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1 Introduction

TIMEPAC will demonstrate the feasibility of combining EPC databases with other data sources to make certification more effective and more reliable. These new methods and tools to enhance current certification practices will be developed in five Transversal Deployment Scenarios (TDS) and validated in four Demonstration Scenarios (DS) across these six European countries: Austria, Croatia, Cyprus, Italy, Slovenia and Spain (Table 1).

Table 1: Transversal deployment scenarios and demonstration scenarios in TIMEPAC project

Transversal Deployment Scenarios		Demonstration scenarios	
TDS1	Generating enhanced EPCs with BIM data	DS1	Improving certification with enhanced EPCs
TDS2	Enhancing EPC schemas through operational data integration	DS2	EPC exploitation through advanced analysis (SRIs)
TDS3	Creating Building Renovation Passports from data repositories	DS3	Building renovation scenarios from the analysis of enhanced EPC data
TDS4	Integration of Smart Readiness Indicators and sustainability indicators in EPC	DS4	Improving building operation with enhanced EPC
TDS5	Large scale statistical analysis of EPC databases		

In the framework of the work to be conducted in these scenarios, the members of the consortium will collect data for processing.

In this document, the project activities which could raise some ethical issues are identified and the protocols which need to be followed to prevent them are described. Some of these issues are also related to data protection, which is addressed separately in Deliverable 6.3 “Data Management Plan”.

2 Definitions

In the context of this document, terms are defined according to the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), hereinafter referred to as EU GDPR, with the specific provisions included in the following definitions:

- **Personal data**

According to Art. 4.1 EU GDPR ‘personal data’ means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

In the framework of the TIMEPAC project, personal data includes data related to energy consumptions and energy bills so they will be included in the provisions of personal data

- **Consent**

According to Art. 4.11 EU GDPR ‘consent’ of the subject of the data means any freely given, specific, informed and unambiguous indication of the subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

In addition, the Consortium is aware of the Guidelines 05/2020 on consent under Regulation 2016/679 of the European Data Protection Board adopted on 4 May 2020 coming from the Guidelines on consent under Regulation 2016/679 of the Article 29 Data Protection Working Party adopted on 10 April 2018 (last rev.) in order to ensure the compliance with the Article 4(11) of the EU GDPR which stipulates that consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

- **Legitimate purpose**

In this sense all personal data collected and processed in the framework of the activities described in this document will only be used for the purposes for which they were acquired. The ultimate purpose of such collection and processing is the compliance with the provisions of the Grant Agreement signed with the European Commission with number 101033819.

- **Pseudonymization**

According to Art. 4.5 EU GDPR ‘pseudonymization’ means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organizational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

3 Review of the EU and national legislation

According to the annotations for the Art. 34 in the Annotated Model Grant Agreement for the H2020 Programme, all the activities will be carried out in compliance with the European Union and national laws. Therefore, the Consortium will carefully consider the European Union and national legislations relevant to the countries where the personal data collections will take place.

In this context all the countries of the beneficiaries participating in TIMEPAC project except for Slovenia have adopted in their national legislations the EU GDPR. As personal data in the TIMEPAC project will be considered for scientific purposes, the EU GDPR must apply according to its Recital 159.

More specifically the following legislations shall be guaranteed in the corresponding countries:

- **Austria**
Federal Act concerning the Protection of Personal Data (DSG)
- **Croatia**
“Zakon o provedbi Opće uredbe o zaštiti podataka”
- **Cyprus**
Law 125(I) of 2018 Providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of Such Data
- **Germany**
Federal Data Protection Act of 30 June 2017 (Federal Law Gazette I p. 2097) as last amended by Article 12 of the Act of 20 November 2019 (Federal Law Gazette I, p. 1626)
- **Italy**
Personal Data Protection Code containing provisions to adapt the national legislation to 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 amended by Law No 160 of 27 December 2019
- (Slovenia) “Zakon o varstvu osebnih podatkov ZVOP-1” published in the Official Gazette of the Republic of Slovenia, No. 94/2007 and No. 177/2020
- **Spain**
“Ley Orgánica 3/2018, de 5 de diciembre, de Protección de Datos Personales y garantía de los derechos digitales” (Organic Law on Protection of Personal Data and Guarantee of Digital Rights) published in Official Gazette of Spain, no. 2018-16673, to adopt the Regulation (EU) 2016/679

In addition, the activities will respect the human integrity and dignity and will ensure the honesty and transparency towards participants when obtaining free and informed consent according to the Ethical principles considered in the Annotated Model Grant Agreement for the H2020 Programme.

4 Provision of the general data protection regulations

Beneficiaries of the TIMEPAC project may need to collect and process data coming from individual volunteers to comply with the provisions of the Grant Agreement signed with the European Commission. Data will only be collected and processed for legitimate purposes.

Each one of the beneficiaries will be solely responsible for the legal obligations related to the data collected. In this sense each beneficiary will apply pseudonymization techniques in order to avoid the sharing or publication of data through which individuals could be identified.

In addition, beneficiaries will respect the fundamental principles of research integrity as set out in the European Code of Conduct for Research Integrity published by the ALLEA - All European Academies - especially those related to data processing.

Table 2 includes all the activities and their corresponding Transversal Deployment Scenarios (TDS) and Demonstration Scenarios (DS) where the beneficiaries will have to collect data.

Table 2: TIMEPAC activities where the beneficiaries will have to collect data

Activity	Participants	TDS	DS	Consent needed
To collect/create/share BIM models from existing buildings for generating EPCs	Building owners, EPC certifiers, energy agencies, public authorities	TDS1 TDS3	DS1 DS2	Yes
To collect energy bills, real energy consumption, occupancy schedules for the enhanced EPC schemes and Building Renovation Passports	EPC certifiers, building occupants, building managers, ESCOs	TDS2 TDS3	DS1 DS2 DS3 DS4	Yes
To conduct qualitative analysis based on surveys to propose a sustainability indicator from Level(s) framework.	EPC certifiers, building owners, building managers, national certification bodies, administrations responsible of Technical Building Codes	TDS4	DS1 DS2 DS3 DS4	Yes
To collect data for Smart Readiness Indicators calculation	EPC certifiers, building owners, building occupants, building managers, ESCOs	TDS4	DS1 DS2 DS3 DS4	Yes
To access EPC databases to carry out large scale statistical analyses	National and regional certification bodies, national and regional authorities and energy agencies, public authorities	TDS5	DS1 DS3	No
To obtain and process information on users' behaviour to assess building energy performance	EPC certifiers, building occupants, building managers	TDS2 TDS3	DS1 DS2 DS3 DS4	Yes

<p>To obtain and process information about the socioeconomic characteristics of the population living in buildings, blocks, districts and neighbourhoods. Relationship with other databases such as cadastre, building technical inspections, data from grants (Next Generation)...</p>	<p>Building owners, EPC certifiers, energy agencies, owners of other building databases.</p>	<p>TDS4</p>	<p>DS1 DS2 DS3 DS4</p>	<p>No</p>
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The participation of Individuals who are requested to provide personal data, related to consumptions or opinions, will be voluntary. As such, participants will be fully informed with an information sheet and consent form in a clear, understandable and plain language which will include the controller’s identity, the legitimate purpose to collect their data or opinions for which consent is sought, the data to be collected and used, the risk if any, the existence of the right to withdraw consent and the use of data for automated decision-making where relevant (see template in the Annex).

As consent is one of the lawful grounds on which personal data processing is based, provisions of the Guidelines 05/2020 on consent under Regulation 2016/679 adopted on 4 May 2020 by the European Data Protection Board will be considered to assure a free, specific, informed and unambiguous indication of wishes from participants who will retain the unconditional right to withdraw his or her consent without detriment. In addition, consent will be given by individuals without influence or dependencies on the members of the project or the partners of the project. In fact, no individuals with a link to any researcher or partner in the TIMEPAC project whose data or opinions could affect the reliability or honesty of the research will be included to guarantee the fundamental principles of research integrity.

In any case, only persons able to give informed consent will be included as participants, no vulnerable individuals or minors will be included as participants.

In addition and related to the personal data, no sensitive personal data will be included (health, sexual lifestyle, ethnicity, political opinion, religious or philosophical conviction), no tracking of participants will be applied and no previously collected personal data will be included (secondary use).

Table 3 contains a description of the technical and organizational measures that will be implemented to safeguard the rights of the personal data.

Table 3: Measures to safeguard the rights of the personal data

Beneficiary	Description of measures
<p>P1. Fundació Privada Universitat i Tecnologia (FUNITEC)</p>	<p><u>Assessment and approval by the Research Ethics Committee</u> Fundació Privada Universitat i Tecnologia (FUNITEC) is a member of the Ramon Llull University (URL) and its academic and research activity is guided through the procedures established by the University. URL has a Research Ethics Committee which provides advice to schools and faculties. This committee is a collegiate and independent body which evaluates and rates the ethical implications of research project, considering their nature, objectives and methodology. The committee operates with full transparency in accordance with national and international regulations, and specifically in accordance with the EU GDPR. Therefore, and prior to data collection, a</p>

	<p>research protocol will be assessed and approved by the Research Ethics Committee of the Ramon Llull University.</p> <p><u>Data collection based on informed consent</u></p> <p>During the informed consent procedures, FUNITEC will assure that participants will be informed of their rights according to the EU GDPR's lawfulness principle, and of the intended use of their data according to the EU GDPR's purpose limitation principle. In addition, FUNITEC has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project. Information sheets and consent forms signed by the participants, either individuals or organizations, will be stored by FUNITEC.</p> <p>In accordance with the EU GDPR's data minimization principle, only data relevant to the objectives of the project will be collected and stored.</p> <p><u>Data processing and storage</u></p> <p>Data processing and storage will be conducted in accordance with the EU GDPR's integrity and confidentiality principles and the national laws. Data will only be stored in corporative systems. Security measures will be implemented to prevent unauthorised access to personal data, including the use of strong passwords and the storage of paper documents in locked cabinets. Files with identifier codes to recover pseudonymised data will be stored with a password only accessible to designated project team members. A limited number of members of the project team will have access to identifiable personal data. These persons will be informed and trained to keep the data in accordance with the EU GDPR and the recommendations issued by the Research Ethics Committee. In addition, and in accordance with the principle of limitation of storage of the EU GDPR and with all legal and contractual obligations, data will be stored only for as long as necessary for the research and the obligations of the Grant agreement.</p>
<p>P2. Jožef Stefan Institute (JSI)</p>	<p>Energy Efficiency Centre is an organisational unit within the Jožef Stefan Institute (JSI) and its academic and research activity is guided by the procedures established by the Institute.</p> <p>The most sensitive information identified during the TIMEPAC project is the personal data regarding the pilots. In the context of JSI involvement in TIMEPAC project, the personal data can be part of the data processed within the pilots' activities, and in such a case, JSI personnel in cooperation with other Slovenian partners (Ministry of Infrastructure and Goriška Local Energy Agency) will implement GDPR agreements to obtain the consent of the data owners in order to be able to process that data for the purpose of the project, and to share it (if necessary) with project's partners. Also, JSI will follow the general rule about data protection and in all public reports and deliverables containing results from the TIMEPAC project all data will be by default anonymized and cleaned from all personal information. This will be clearly explained to all Slovenian stakeholders. Anonymization yields the highest level of protection of the Research Participant's identity, while not hampering the dissemination of the research results as it is outlined in the Grant Agreement. Data providers will remain owners of the data and they will have full control over provided data.</p> <p>Additionally, during the informed consent procedures, JSI will assure that all Slovenian participants will be informed of their rights according to the EU GDPR's lawfulness principle, and of the intended use of their data according to the EU GDPR's purpose limitation principle. The JSI has an</p>

	<p>appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project. Information sheets and consent forms signed by the participants, either individuals or organizations from Slovenia, will be stored by the JSI. Data processing and storage will be conducted in accordance with the EU GDPR's integrity and confidentiality principles and the national laws. All data that are and will be collected from the project participants from Slovenia will be maintained in a single folder on the JSI SharePoint portal. In this manner, data does not get dispersed or unintentionally disclosed. Security measures will be implemented to prevent unauthorised access to personal data, including the use of strong passwords and the storage of paper documents in locked cabinets. Files with identifier codes to recover pseudonymised data will be stored with a password only accessible to designated project team members. In addition, and in accordance with the principle of limitation of storage of the EU GDPR and with all legal and contractual obligations, data will be stored only for as long as necessary for the research and the obligations of the Grant agreement. At the same time, all participants from Slovenia will maintain full control over the content of their data and their folders. They can modify or delete the content whenever they feel the need to do so. In accordance with the EU GDPR's data minimization principle, only data relevant to the objectives of the project will be collected and stored.</p>
<p>P3. Politecnico di Torino (POLITO)</p>	<p>The Politecnico di Torino apply, within their own organization, all current and secondary laws, relevant for the correct management of the treatment, including the EU 2016/679 Regulation of the European Parliament and of the Council of 27/04/2016 (hereafter "GDPR"). The "personal data" provided, also verbally, for the pre-contractual activity or otherwise collected as a consequence and during the execution of some of agreement or contract, will be treated exclusively for the purposes strictly connected to this agreement or contract or to carry out the research and development activity, through consultation, processing, interconnection, comparison with other data and/or any further manual and/or automated processing and furthermore, for statistical purposes, with exclusive treatment of data in anonymous form, by communication to public entities, when they requested for the pursuit of their institutional purposes, as well as private entities, when the purpose of the request is compatible with the institutional aims of the Politecnico, knowing that failure to provide data may result in failure or partial execution of the agreement or contract.</p> <p>The Politecnico di Torino agree to comply with all relevant regulations on the protection and processing of personal data applicable to them under the agreement or contract, including the adoption of security measures suitable and adequate to protect personal data against the risk of destruction, loss, even accidental, of unauthorized access or modification of data or processing not allowed or not compliant with the purposes related to the agreement or contract.</p>
<p>P4. Institut Català d'Energia (ICAEN)</p>	<p>The Catalan Energy Institute is the entity of the Government of Catalonia in charge of elaborating and carrying out the Catalan energy policy, especially in the field of the improvement of the saving and the energetic efficiency and the development of the renewable energies.</p>

	<p><u>Data collection based on informed consent</u></p> <p>ICAEN will assure that participants will be informed of their rights according to the EU GDPR’s lawfulness principle, and of the intended use of their data according to the EU GDPR’s purpose limitation principle. In addition, ICAEN has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project.</p> <p>Only data relevant to the objectives of the project will be collected and stored.</p> <p><u>Data processing and storage</u></p> <p>Data processing and storage will be conducted in accordance with the EU GDPR’s integrity and confidentiality principles and the national laws. Data will only be stored in corporative systems. Security measures will be implemented to prevent unauthorised access to personal data, including the use of strong passwords and the storage of paper documents in locked cabinets. Files with identifier codes to recover pseudonymised data will be stored with a password only accessible to designated project team members. A limited number of members of the project team will have access to identifiable personal data.</p>
<p>P5. CYPE Soft S.L.</p>	<p>CYPE complies with current legislation regarding the protection of personal data in accordance with the provisions of the Organic Law of Data Protection (Spain. Ley Orgánica 3/2018, de 5 de diciembre) and European Regulation 2016/679.</p> <p>Data collection based on informed consent.</p> <p>Only data relevant to the objectives of the project will be collected and stored.</p> <p>Data processing and storage will be conducted in accordance with the EU GDPR’s integrity and confidentiality principles and the national laws.</p> <p>Data will be stored only for as long as necessary for their purpose.</p>
<p>P6. Ministrstvo za infrastrukturo (MI)</p>	<p>The Ministry of Infrastructure (MI) is a state ministry responsible for energy and its work activities are guided by the procedures established by the Government of the Republic of Slovenia.</p> <p>In the context of TIMEPAC project, MI personnel in cooperation with other Slovenian partners (Jožef Stefan Institute and Goriška Local Energy Agency) will implement GDPR agreements to obtain the consent of the data owners in order to be able to process that data for the purpose of the project, and to share it (if necessary) with project’s partners. In the scope of the TIMEPAC project, MI will support JSI anonymization of data collected in Slovenia. MI will clearly advocate that data providers must remain owners of the data and that they must have full control over provided data.</p> <p>Additionally, during the informed consent procedures, MI will support the JSI and it will assure that all Slovenian participants will be informed of their rights according to the EU GDPR’s lawfulness principle, and of the intended use of their data according to the EU GDPR’s purpose limitation principle. MI has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project.</p>
<p>P7. Goriška Lokalna Energetska</p>	<p>Goriška Local Energy Agency (GOLEA) is an independent and non-profit legal entity and its work activities are guided by agency’s statute, internal regulations and Slovenian legislation framework.</p>

<p>Agencija, Nova Gorica (GOLEA)</p>	<p>In the context of TIMEPAC project, GOLEA personnel in cooperation with other Slovenian partners (Jožef Stefan Institute and Ministry of Infrastructure) will implement GDPR agreements to obtain the consent of the data owners in order to be able to process that data for the purpose of the project, and to share it (if necessary) with project's partners. In the scope of the TIMEPAC project, GOLEA will support JSI's anonymization of the data collected in Slovenia. GOLEA will inform all its partners and data providers that will participate in the TIMEPAC project (building owners and users) that they will remain owners of the data provided and that they will have full control over provided data.</p> <p>Additionally, during the informed consent procedures, GOLEA will support JSI and it will assure that all Slovenian participants will be informed of their rights according to the EU GDPR's lawfulness principle, and of the intended use of their data according to the EU GDPR's purpose limitation principle. GOLEA has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project.</p>
<p>P8. European Science Communication Institute, gGmbH (ESCI)</p>	<p>Data collection based on informed consent</p> <p>During the informed consent procedures, ESCI will assure that participants will be informed of their rights according to the EU GDPR's lawfulness principle, and of the intended use of their data according to the EU GDPR's purpose limitation principle. In addition, ESCI has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project. Information sheets and consent forms signed by the participants, either individuals or organizations, will be stored by ESCI.</p> <p>In accordance with the EU GDPR's data minimization principle, only data relevant to the objectives of the project will be collected and stored.</p> <p>Data processing and storage</p> <p>Data processing and storage will be conducted in accordance with the EU GDPR's integrity and confidentiality principles and national laws. Data will only be stored in corporative systems. Security measures will be implemented to prevent unauthorised access to personal data, including the use of strong passwords and the storage of paper documents in locked cabinets. Files with identifier codes to recover pseudonymised data will be stored with a password only accessible to designated project team members. A limited number of members of the project team will have access to identifiable personal data. These persons will be informed and trained to keep the data in accordance with the EU GDPR and the recommendations issued by the Research Ethics Committee. In addition, and in accordance with the principle of limitation of storage of the EU GDPR and with all legal and contractual obligations, data will be stored only for as long as necessary for the research and the obligations of the Grant agreement.</p>
<p>P9. Edilclima, S.r.l. (EDIC)</p>	<p><u>Owner</u></p> <p>The Data Controller, in accordance with the Law, is Edilclima S.r.l. (via Vivaldi, 7, 28021 Borgomanero (NO); P. IVA: 00460470032) in the person of its legal representative pro tempore, Paola Soma.</p> <p><u>Data collection and informed consent</u></p>

	<p>Once the nature of the processed data has been established, EDILCLIMA will integrate the information for the collection of consent to the use of the data with respect to the specific purpose of the processing.</p> <p>EDILCLIMA, in its quality of Data Controller, pursuant to and for the purposes of EU Regulation 2016/679 (GDPR), will inform those interested that the above-mentioned legislation covers the protection of the processing of personal data and that such processing will be based on the principles of fairness, lawfulness, transparency and protection of their confidentiality and their rights.</p> <p>Personal data will be processed in accordance with the legal dispositions of the above-mentioned legislation and the confidentiality obligations therein.</p> <p><u>Data processing and storage</u></p> <p>Staff expressly authorised by the Data Controller will only process data.</p> <p>Only data specific for the project objectives will be collected and stored into the company system.</p> <p>All necessary protective measures will be taken to prevent unauthorized access to data relating to the Project, such as</p> <ul style="list-style-type: none"> - obligation to use complex passwords to access the workstation; - obligation not to leave electronic tools unattended and accessible while a work session is in progress; <p>where paper files and documents containing special categories of data are entrusted, they shall be controlled and stored in such a way as to ensure that no unauthorised person has access to the data, by means of lockable drawers or cabinets or other devices having an equivalent function.</p>
<p>P10. Regione Piemonte (RP)</p>	<p><u>General ethic rules</u></p> <p>The Piedmont Region as a public body operates exclusively in the pursuit of general interest through the work of its officials. They operate according to the principles of impartiality, legality, integrity, transparency, efficiency, equality, responsibility and justice. Furthermore, they are required to manage public resources appropriately and with effectiveness. A series of rules of conduct reinforce respect for employee ethics. The rules are codified in internal regulations in order to prevent acts of corruption and provide indications in any potential conflict of interest. Besides, administrative procedures are codified according to the potential risk of corruption and a specific Department oversees compliance with these principles. The staff undergoes periodic training on the subject.</p> <p>The protection of the personal data of its citizens from the risk of data breach, is guaranteed by internal regulations and procedures with full transparency and in accordance with national and international regulations, and specifically in accordance with the EU GDPR</p> <p><u>Data collection based on informed consent</u></p> <p>During the informed consent procedures, PIEMONTE will assure that participants will be informed of their rights according to the EU GDPR’s lawfulness principle, and of the intended use of their data according to the EU GDPR’s purpose limitation principle. In addition, PIEMONTE has an appointed Data Protection Officer, whose contact details will be made available to any participant involved in the project. Information sheets and consent forms signed by the participants, either individuals or organizations, will be stored by PIEMONTE.</p>

	<p>In accordance with the EU GDPR’s data minimization principle, only data relevant to the objectives of the project will be collected and stored.</p> <p><u>Data processing and storage</u></p> <p>Data processing and storage will be conducted in accordance with the EU GDPR’s integrity and confidentiality principles and national laws. Data will only be stored in the official folders of Piemonte Region, whose access is allowed to a limited number of members of the Sustainable Energy Department. These persons are informed and trained to keep the data in accordance with the EU GDPR and the recommendations issued by internal regulations. Security measures will be implemented to prevent unauthorised access to personal data, including the use of strong passwords. In addition, and in accordance with the principle of limitation of storage of the EU GDPR and with all legal and contractual obligations, data will be stored only for as long as necessary for the research and the obligations of the Grant agreement.</p> <p>The contact details of the data protection officer (DPO) is: dpo@regione.piemonte.it.</p>
<p>P11. Institute for Sustainable Energy and Resources Availability (SERA global GmbH)</p>	<p>SERA global GmbH operates according to the requirements imposed by the GDPR and the related Austrian legislation. The data protection officer attended a training offered by an acknowledged organisation in March 2018 on how to implement measures in compliance with the new legislative framework. The necessary documents describing the relevant procedures and conditions have been prepared and have been implemented. For example, we use only services that are explicitly GDPR compliant, namely: <i>Nextcloud</i> operated by <i>Siedl Networks GmbH</i> for collaborative work, <i>CleverReach</i> for sending newsletters and messages to our target audience, and <i>2ask</i> for surveys and questionnaires. Our provider for website and email is <i>all-inkl</i> located in Germany and thus also operating under strict GDPR conditions. Also, all other external service providers are proven to be GDPR compliant.</p> <p>We send newsletters and messages based on registrations on the SERA website (consent) and based on professional relations. We are members of several multiplier organisations and send notifications and messages also through the management of these networks.</p>
<p>P12. Energy Institute Hrvoje Požar (EIHP)</p>	<p>Energy Institute Hrvoje Požar is an institution whose activities comprise of provision of scientific and expert services in the field of energy and environment.</p> <p>OUR MISSION - To continuously fulfil the needs and expectations of our clients and other interested parties while simultaneously taking care of the environment and preserving natural resources, through quality, delivery accuracy and reliability during the implementation of our services</p> <p>OUR VISION - To become a pioneer in the field of energy planning and in the field of environmental protection, based on the principles of business excellence, ecological sustainability, and through the application n of the best scientific methods.</p> <p>In order to meet, maintain and enhance our mission and vision we are committed to:</p> <ul style="list-style-type: none"> • Paying attention to achieving and maintaining the highest satisfaction of our clients through quality and timely realization of services,

- Employing professional and ambitious personal who will have the opportunity and obligation to develop and improve,
- Continuously improving the technological equipment,
- Nurturing and improving partner relations with suppliers and contractors,
- Continuously monitoring world trends in our field and applying those in our activities,
- Setting ambitious, measurable and realistic goals,
- Applying and continuously improving the efficiency of the management system based on the requirements of the international ISO 9001 norm,
- Continuously complying with legal and other requirements regarding our field of work and with all other requirements regarding our business,
- Continuously monitoring and respecting the rules regarding the prevention of money laundering and financing of terrorism, and to promote a zero-tolerance policy towards corruption,
- Consistently determining the risks and opportunities during offering and contracting of our services,
- Continuously monitoring and applying the highest standards and requirements regarding the protection of information we work with, especially the personal information of our partners, employees and all persons whose data we obtained during implementation of our business activities and research.

Data collection & processing

We collect and process personal data in accordance with the provisions of EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation), Act of the implementation of the General data Protection Regulation (Zakon o provedbi Opće uredbe o zaštiti podataka) (Official Gazette No. 42/2018) and other relevant regulations applicable in the Republic of Croatia.

Legal bases of data processing can be:

- fulfilment of legal obligations of the Institute,
- performing a task of public interest or in the exercise of official authority of the Institute,
- concluding or executing a contract,
- legitimate interest to the extent that it is more important than the interest of the respondents not to process the data,
- consent, another legal basis in accordance with the EU Regulation.

Rights of respondents

Regardless of the legal basis of data processing, respondents are entitled to:

- access, modification or supplementation of data,
- deletion ("right to forget") of personal data,
- restrict data processing or object to data processing,
- if the data are given on the basis of consent, the consent may be withdrawn, - the right to file a complaint to the competent supervisory authority - in Croatia it's the National Agency for GDPR (more on this on www.azop.hr).

	<p>All rights are subject to proportionate restrictions in accordance with the EU Regulation.</p> <p>Data storage</p> <p>The Institute keeps certain data permanently, and those for which it is prescribed by special laws. However, the vast majority of data are kept to a minimum and only the data required to fulfil mutual obligations to our partners are stored, so often the deadlines for data retention depend on the fulfilment of contractual obligations.</p> <p>If we process data on the basis of consent, we retain the data until the consent is revoked, except in the case of legal data retention obligations on the basis of which proof of competence for some type of work is obtained. We keep such data for the duration, in accordance with special regulations.</p>
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Once the project has been completed, the data will be deleted five years after the completion of the project unless one of the reservations legally contained.

Table 4 contains the contact details of the Data Protection Officers (DPOs) if applicable, or of person in charge of each beneficiary:

Table 4: Data Protection Officers

Beneficiary	Name	Contact details
P1. Fundació Privada Universitat i Tecnologia (FUNITEC)	Mr. Josep Matas	Dpare@salle.url.edu
P2. Jožef Stefan Institute (JSI)	Mr. Luka Virag	luka.virag@ijs.si
P3. Politecnico di Torino (POLITO)	Ms. Nicoletta Roz	dpo@polito.it
P4. Institut Català d’Energia (ICAEN)	Mr. Joan Esteve Reyner	joan.esteve@gencat.cat
P5. CYPE Soft S.L.	Ms. Ana Filgueira	ana.filgueira@cype.com
P6. Ministrstvo za infrastrukturo (MI)	Mr. Peter Dolinar	peter.dolinar@gov.si
P7. Goriška Lokalna Energetska Agencija, Nova Gorica (GOLEA)	Mrs. Suzana Vidmar Kovšca	suzana.vidmar.kovsca@golea.si
P8. European Science Communication Institute, gGmbH (ESCI)	Mrs. Maike Bartlmae	mb@medienrecht-nordwest.de

P9. Edilclima, S.r.l. (EDIC)	Not compulsory in accordance with GDPR The legal representative of EDILCLIMA, Paola Soma, is the Data Controller.	
P10. Regione Piemonte (RP)	n.a.	dpo@regione.piemonte.it
P11. Institute for Sustainable Energy and Resources Availability (SERA global GmbH)	Dr. Susanne Geissler	s.geissler@sera.global
P12. Energy Institute Hrvoje Požar (EIHP)	Mr. Valent Pessi	zastita.podataka@eihp.hr

5 Annexes

a) Annex 1 - Template for Information sheet and consent form

This Annex contains a template of the information sheet and consent form that participants will be provided with in the TIMEPAC research activities. Changes can be introduced by the DPOs of the respective beneficiaries.

Texts in brackets [] are mandatory, the content of which varies depending on the partner involved in the activity and the activity itself. Texts in parentheses () are compulsory only when applicable. Texts in brackets [] and parenthesis () will be described in a clear and plain language.

INFORMATION SHEET

The members of the [NAME OF THE RESEARCH GROUP] of [BENEFICIARY], are carrying out the research project entitled “Towards innovative methods for energy performance assessment and certification of buildings” (TIMEPAC), whose main researcher is [NAME OF THE MAIN RESEARCHER OF THE GROUP [corporate email]]. The project is carried out in conjunction with [OTHER BENEFICIARIES] and is funded by the European Commission with the Grant agreement number 101033819.

TIMEPAC will contribute to improving existing energy certification processes, moving from single, static certification to more holistic and dynamic approaches, which consider: a) the data generated in the overall energy performance certification process, from generation to storage, to analysis and exploitation, and throughout all the building lifecycle, from design, to construction and operation b) buildings as part of a built environment, connected to energy distribution and transport networks and c) buildings as dynamic entities, continuously changing over time. TIMEPAC will demonstrate the feasibility of combining the existing databases with other data sources to make energy performance certificates more effective and reliable. The outcomes of the research will be used as training materials to further educate professionals involved in certification process.

In the context of this research, we ask for your collaboration to [REASONS THAT JUSTIFY THE PARTICIPATION] provided that your participation meets the inclusion criteria [DESCRIBE THE INCLUSION CRITERIA] (and is not in any of the exclusion criteria [DESCRIBE THE EXCLUSION CRITERIA]). You are contributing towards this research by helping us [EXPLAIN THE RESULTS OF THE PARTICIPATION]. The results will help us to [EXPLAIN THE IMPACT ON THE PROJECT].

This collaboration will involve participating in [EXPLAIN THE PHASES AND TYPES OF PARTICIPATION] and will involve collecting personal information, specifically [EXPLAIN WHAT INFORMATION AND HOW IT WILL BE COLLECTED]. (Your participation may involve the following risks or inconveniences: [DESCRIBE THE RISKS OR DISCOMFORTS]).

Your participation is entirely voluntary. If you do decide to take part, you will be given this information sheet to keep and be asked to sign a consent form. However, you are free to withdraw at any time and without giving a reason.

The data collected for your participation will not be used for any purpose other than the mentioned as the object of this project and will become part of a data file under the responsibility of [BENEFICIARY], subject to [INCLUDE LEGAL BASIS SUCH AS General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)] and complementary regulations.

All information collected will be kept strictly confidential subject to legal limitations, being protected by [EXPLAINING THE PROTECTION SYSTEM] and to which only [IDENTIFY THE PERSONS WITH ACCESS] will have access for its treatment. In addition, all your data and opinions will be anonymized so we will not identify anyone in our reports.

Once the project has been completed, the data will be deleted five years after the completion of the project unless one of the reservations legally contained in [INCLUDE LEGAL BASIS SUCH AS General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)] applies, especially those relating to the use of data for scientific purposes.

Your rights regarding the personal data collected may be exercised in writing at the postal address indicated in the footer or at the e-mail address [INCLUDE THE E-MAIL OF THE DPO OR RESPONSIBLE PERSON FOR THE BENEFICIARY]. In any case, whether to file a complaint, request clarification or send a suggestion, it is possible to contact the Data Protection Officer by e-mail at [INCLUDE THE E-MAIL OF THE DPO OR RESPONSIBLE PERSON FOR THE BENEFICIARY].

(You can find more information regarding the privacy policy of the data processed by [BENEFICIARY] at the address [WEB PAGE OF PERSONAL DATA PROTECTION FOR THE BENEFICIARY])

We are at your disposal to solve any questions. Thank you very much for your cooperation.

CONSENT FORM

I _____, adult, with ID _____,
acting in my own name and interest,

DECLARE THAT

I have received information about the TIMEPAC project (Grant agreement number 101033819) from which I have been given the information sheet for the participants attached to this document and for which my participation is requested. I have understood its meaning and the doubts raised have been clarified. I have been informed of the aspects related to the confidentiality and data protection related to the management and processing of personal data involved in the project and associated rights in compliance with [INCLUDE LEGAL BASIS SUCH AS General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)] and complementary regulations.

My participation in the project is entirely voluntary and I have the right to withdraw at any time, revoking this consent, without this withdrawal being able to adversely affect me.

I also waive any economic, academic, or other benefits that may arise from the project or its results.

For all this,

I GIVE MY CONSENT TO

1. Participate in the TIMEPAC project.
2. That my personal data, collected for the sole purpose of meeting the objectives of the project, be processed by [IDENTIFY PERSONS WITH ACCESS].
3. That my personal data is kept under the responsibility of [BENEFICIARY], being able to exercise my rights in writing to the postal address indicated in the footnote or to the e-mail address [INCLUDE THE E-MAIL OF THE DPO OR RESPONSIBLE PERSON FOR THE BENEFICIARY], as well as being able to file complaints, request clarifications or send suggestions to [INCLUDE THE E-MAIL OF THE DPO OR RESPONSIBLE PERSON FOR THE BENEFICIARY].
4. That such personal data be kept for as long as is necessary to meet the objectives of the project and at least until five years after the completion of the project unless one of the reservations legally contained in [INCLUDE LEGAL BASIS SUCH AS General Data Protection Regulation of the European Union (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016)] and complementary regulations.

Signed in duplicate at _____ on _____

in a single document consisting of [NUMBER] numbered pages.

The Participant

The Researcher