

DATA USAGE CONTROL FOR EMPOWERING DIGITAL SOVEREIGNTY FOR ALL CITIZENS (HORIZON-MSCA-2021-SE-01)

D1.1 Data Management Plan - DMP

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Abstract	Deliverable D7.1 The DMP describes the data management life cycle for the data collected, processed and/or generated by the project. This deliverable will evolve during the project lifetime.
Keywords	Data collection and management

Document Revision History

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V1.0	30/06/2023	Final version for formal submission	James Clarke (SETU)

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Project co-funded by the European Commission in the Horizon Europe Programme		
Nature of the deliverable:		R (Report)
Dissemination Level		
PU	Public, fully open, e.g., web	✓
SEN	Sensitive	

* R: Document, report (excluding the periodic and final reports)

DEM: Demonstrator, pilot, prototype, plan designs

DEC: Websites, patents filing, press & media actions, videos, etc.

OTHER: Software, technical diagram, etc.

EXECUTIVE SUMMARY

This deliverable is the Data Management Plan (DMP) of DUCA, which is a formal document that outlines how the data in the project will be looked after both during the lifetime of the project and beyond.

The role of a DMP includes provisioning of information about the following elements:

- The volume and type(s) of data the project will generate.
- How the project will ensure that data is well organised and adequately documented.
- How the project will make sure that data is ethically and legally compliant.
- Where data will be stored and backed up during the lifetime of the project.
- How the project will preserve data and make it available for others to reuse (where appropriate) in the long term.
- Assigned responsibilities for looking after data during and after the project and what resources will be needed.

In writing the DMP, the DUCA partners have followed the format of the recommended standardised online tool, entitled Dmponline, from the Digital Curation Centre in the United Kingdom¹. The sections in this deliverable follow the suggested template in the Dmponline tool.

As described in the DMP, the data collected by the project is mainly free form data from the individuals involved in the DUCA project only.

Due to the nature of the DUCA project's goals and objectives, the project will be developing a standard web site. It is still undecided about whether a registration facility will be needed on the soon to be developed DUCA web portal. If needed, usernames and passwords will be gathered in a registration facility of the DUCA platform, which will not be shared with anyone outside of the project. Email addresses and other personal information will be used by DUCA only for sending specific communications to the community of users, such as newsletters, invitation to webinars and other events and similar community development and engagement activities.

Overall, DUCA will be in compliance with the provision of General Data Protection Regulation (GDPR) which has been in force across Europe since 25th of May in 2018.

¹ <https://dmponline.dcc.ac.uk/plans>

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LIST OF ACRONYMS

CMS	Content Management System
CNR	CONSIGLIO NAZIONALE DELLE RICERCHE
DMP	Data Management Plan
Dmponline	Data Management Plan - online
DUCA	Data Usage Control for empowering digital sovereignty for All citizens
GDPR	General Data Protection Regulation
IP	Internet Protocol
MSCA SE	Marie Skłodowska-Curie Actions Staff Exchanges
OS	Operating System
PC	Project Coordinator
RBAC	Role Based Access Control
SETU	South East Technological University (Coordinating Partner)
UI	User Interface
UT3	UNIVERSITE PAUL SABATIER TOULOUSE III - UNIVERSITE TOULOUSE III - Paul Sabatier

1. BACKGROUND AND OBJECTIVES

This document provides an overall data management plan (DMP) for the data structure and capture activities involved in the DUCA web platform.

1.1 Relation with other project deliverables

This report mainly deals with the activities and project deliverables of WP6, Communication, Dissemination and Exploitation, which is responsible for all the tasks related to the communications, dissemination and exploitation activities via the DUCA online platform, when available. Consequently, the related deliverable of WP6 is:

- D6.1, Plan for dissemination, exploitation and communication. Due in M6

1.2 Structure of the document

The document is organised as follows:

- Section 2 addresses all the items required in the Data Management Plan according to the table of contents of the Dmponline tool.
- Section 3 summarises the procedures maintained by DUCA to comply with the GDPR.
- Appendix 1 contains the full Privacy Policy of the projects' on-line platform, when available.

2. DATA MANAGEMENT PLAN

2.1 Preamble

Plan name: DUCA

ID: DUCA

Grant number: 101086308

Principal Investigator/Researcher: James Clarke

Principal Investigator/Researcher ID: <https://orcid.org/0000-0002-1330-7488>

Plan data contact: James.Clarke@waltoninstitute.ie

Short Description of project

DUCA is an [MSCA Staff Exchanges](#) (MSCA SE) project of four year (January 2023 – December 2026) duration coordinated by South East Technological University (SETU). Its main aim is to promote innovative international, inter-sectoral and interdisciplinary collaboration in research and innovation through exchanging staff and sharing knowledge and ideas at all stages of the innovation chain.

The DUCA consortium includes the following partners: SOUTH EAST TECHNOLOGICAL UNIVERSITY – SETU – IE; CONSIGLIO NAZIONALE DELLE RICERCHE – CNR – IT; UNIVERSIDAD DE MALAGA – UMA – ES; UNIVERSITE PAUL SABATIER TOULOUSE III - UNIVERSITE TOULOUSE III - Paul Sabatier – UTC3 – FR; HUAWEI TECHNOLOGIES DUESSELDORF GMBH – HWDU – DE; CONSORTIUM UBIQUITOUS TECHNOLOGIES S.C.A.R.L. – CUBIT – IT; YL-VERKOT OY – FIN; UNIVERSITA DEGLI STUDI DI TRENTO – UNITN – IT; UBITECH DESIGN PLANNING IMPLEMENTATION & SALE OF INFORMATION WORKS – EL; FORTISS GMBH – DE.

2.2 Data summary

2.2.1 PURPOSE OF THE DATA COLLECTION / GENERATION

In DUCA, there will be a standard on-line web platform consisting of web portal with information related to the project objectives and dissemination activities. The web site will be available at the end of Month 9 (September 2023).

It has not been decided yet whether there will be the need for registration facility on the web site. Due to the nature of the project, which is mainly to facilitate secondments between the partners for knowledge sharing between the partners themselves, it is unlikely there will be a need for a registration facility.

However, if it is decided that a registration facility will be employed in the portal, DUCA will only collect the registered email address to verify the account and when registering as a user, the participant must accept the platform privacy policy. This Privacy policy is fully GDPR compliant and can be seen in Appendix 1.

2.2.2 RELATION TO THE OBJECTIVES OF THE PROJECT

The overall goal of DUCA is to fund secondments between the DUCA partners to carry out the following objectives:

- O1. To build a flexible and easy to use distributed framework for managing data sharing agreements, which will empower users to control the usage of their data.
- O2. To develop and integrate several security and privacy enhancing technologies and to tailor these to the specific needs of the DUCA platform and use cases*.
- O3. To deploy and validate the overall distributed data usage control framework in several use cases*.

*Within the DUCA consortium, we have identified the following three use cases as relevant samples to showcase our framework: Smart technologies for energy, agriculture, and others; Usage control for Big Data and Artificial Intelligence; and Collaborative mobility.

2.2.3 TYPES AND FORMATS OF DATA GENERATED/COLLECTED

Data is free form data entered by users themselves directly into the web portal.

2.2.4 EXISTING DATA IS ALWAYS ON-LINE AND AVAILABLE

As mentioned above, if a registration facility is eventually used in the portal, the users will be given dedicated and customised privileges, dependent on their role, and the information is always on-line and available, when needed. The source data entered is not made public or shared outside the consortium. It is only used by the consortium for the purposes of registering the users and verifying accounts.

2.2.5 ORIGIN OF THE DATA

In the case of user entry, the data is provided by the portal users themselves. The data will not be interfered with by any other users. As mentioned above, the users are only given dedicated and customised privileges, based on their role.

2.2.6 EXPECTED SIZE OF THE DATA

If required, the registration entries to the web portal are guided for each field of entry required. The data could range from tick boxes to single word categories (e.g., Names, email address) to fields that would require up to maximum 200 words length.

In total over the lifetime of the project, it is expected that the entire data will not be more than 10GB. Personal data will form no larger than 1GB (based on 10,000 users each with 100kB of personal data).

2.2.7 DATA UTILITY

If a registration facility is used, all the information gathered by the web portal is to support the DUCA project and the European Commission in its communications and dissemination activities.

The personal data of the users would never be shared being shared beyond the project consortium members.

2.3 Making data findable, including provisions for metadata

2.3.1 DISCOVERABILITY OF DATA

When developed, the web portal will have search functionality for the discoverability of public data only. This would include project related information and dissemination activities.

2.3.2 APPROACH TOWARDS SEARCH KEYWORDS

As mentioned above, there will be search functionality provided, where applicable, in the DUCA portal Platform. This will be based on keywords placed into the search bar by the user of the site.

2.3.3 APPROACH FOR CLEAR VERSIONING

When available, the web portal entries will be typically date and time stamped (e.g., news items), which will enable clear versioning of the entries themselves and reports can be generated, when needed e.g., for purposes of gathering anonymised statistics, as required by the European Commission.

2.4 Making data openly accessible

2.4.1 DATA OPENLY AVAILABILITY

The textual and graphical data entered by the project into the web portal will only be openly public data and information. Any other information related to the project participants is only available on a need-to-know basis, and privilege basis.

2.4.2 METHODS OR SOFTWARE TOOLS TO ACCESS THE DATA

The DUCA platform is currently being defined using a CMS (Content management system), with a modern look and an appealing user experience design. This platform will have standard features that are functional and easy to use, such as content authoring, reliable performance, and excellent security. The DUCA portal is being designed to be GDPR-compliant.

2.4.3 DEPOSITION OF DATA, DOCUMENTATION AND CODE

For security reasons, a limited number of project members will be given access to the system back-end, and they can access the information in any case where there are any restrictions. Data access is based on a manual administered RBAC (Role Based Access Control) process. This privilege is going to be restricted to SETU personnel, who will be the developers of the platform. Information on where the server is controlled can be found in Appendix 1, Privacy Policy, item 3.

2.5 Making data interoperable

2.5.1 ASSESS THE INTEROPERABILITY OF YOUR DATA

The data from the DUCA platform will not be shared with other 3rd parties for any reason, except for our own anonymous statistical data. Therefore, the interoperability aspects of the data aren't considered by the project.

2.5.2 STANDARD VOCABULARY FOR ALL DATA TYPES

During the data entry process, if required, the project team will provide guidance to the users for data entry in terms of standard vocabulary and size of entries (number of characters or words) for all data types.

2.6 Increase data re-use (through clarifying licences)

2.6.1 DATA LICENCE TO PERMIT THE WIDEST REUSE POSSIBLE

If a registration facility is deemed necessary, when users register, they accept a terms and conditions of usage, where it is made clear that data added to the platform will not be publicly available, including their personal data.

2.6.2 PERIOD IN WHICH DATA WILL BE MADE AVAILABLE FOR RE-USE

As mentioned above, the information and data input to the platform will only be regularly downloaded in an anonymised way (with no personal data) and summarized to be used for generating standard statistical data.

From the perspective of open data available for re-use, as the project has recently started, we recognise that as the ongoing process develops over the project lifetime, it is our plan to review the type of data generated and which data belongs where in order to update the DMP, if necessary.

2.6.3 DATA PRODUCTION AND/OR USED IS USABLE BY THIRD PARTIES

Data will not be available, at any time, for usability by any other third parties, under any circumstances, unless it is anonymised, such as the statistics data, as mentioned above.

2.6.4 DATA QUALITY ASSURANCE PROCESSES

The project will monitor the data with this important consideration in mind on a regular basis to ensure that the quality of the data is taken into consideration.

2.6.5 LENGTH OF TIME FOR WHICH THE DATA WILL REMAIN RE-USABLE

It is expected that the data will remain re-usable for the lifetime of this project only; it is possible that the project may need to maintain the data beyond the end date of the project, only in case the records of the project needs to be kept for review purposes of the European Commission services and independent evaluators, for a specific duration after the project is officially concluded. This duration would be based upon the specific requirement placed upon the DUCA project for storing records for the project.

2.7 Allocation of resources

2.7.1 ESTIMATE THE COSTS FOR MAKING DATA FAIR²

The costs associated with the data is considered low, as the system is being designed already as GDPR compliant and plans to use tools that are both user friendly and provide the developers with ease of access for moderation. The efforts associated with ensuring the data is FAIR is taken care of primarily in the personnel costs of the project.

² Findable, Accessible, Interoperable & Re-usable

2.7.2 RESPONSIBILITIES FOR DATA MANAGEMENT

The overall data management in the project is the responsibility of WP1, Project Management, Task 1.4, Data Management, in close conjunction with the Work Package and task leaders in WP6, Communication, Dissemination and Exploitation, which is responsible for all the tasks related to the communications, dissemination and exploitation activities via the DUCA online platform, when available. UT3 is the data controller for all data collected under the project. The contact person for this is Ms. Giorgia MACIOTTI.

2.7.3 COSTS AND POTENTIAL VALUE OF LONG-TERM PRESERVATION

The costs involved and potential value would be considered relatively low, as the preservation of the data is not expected to be long term.

2.8 Data security

The overall web portal will adopt security measures consistent with the provisions of the General Data Protection Regulation (GDPR) to protect personal information under its control against loss, misuse, and alteration. In general terms, server configuration, https certificates, access controls, password storage and other relevant elements are dealt with in accordance with the provisions of the GDPR.

In the design of the portal, we attempt to strike a reasonable balance between security and convenience. Emails are usually sent as unencrypted text. If misrouted or intercepted, an unencrypted email could be read easily. If there is a matter that requires high security or confidentiality, we request for our partners to please keep us informed about the sensitivity of the information and request they not send the related information through email.

The project will take measures to prevent data loss and facilitate any security aspects related to the transfer of data and information, as required.

The project will keep the DUCA Security Advisory Board (SAB) set up in WP7 apprised of any security related questions and issues and seek guidance when and if required.

2.9 Ethical aspects

While it is still undecided whether the portal will enable registration facilities, in case it does, this would mean that the project involves the collection of data from human participants via the online portal. If that is the case where data is collected, while we consider that ethical approvals may not be needed, we agree that the project is not free of ethical considerations.

We identify the following, according to the ethics Horizon Europe Programme Guidance on ethics self-assessment in Horizon Europe³:

1) **Confirm that informed consent has been obtained.** Yes, it will be obtained when the user registered to the site and agreed to the privacy policy, as item number 1 of the Privacy Policy is related to informed consent (see Appendix 1, Privacy Policy). We will also gain consent for any information that will be made open access.

2) **Documents to be provided/kept on file:** If necessary, informed Consent Forms + Information Sheets will be kept on file. These records are kept on record in the portal server, and can be inspected, if requested.

If needed, we will liaise with the SETU Ethics Committee in SETU to ensure that we are fully compliant with regulatory and legal requirements and submit a full application for ethical review, if required, in line with their procedures and terms of reference.

The project will also draw upon the experience of the members of the Security Advisory Board (SAB) set up in WP7.

³ https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/how-to-complete-your-ethics-self-assessment_en.pdf

3 PROCEDURES IMPLEMENTED TO SUPPORT GDPR COMPLIANCE

Where required, the following procedures and specific functionalities will be implemented and continuously maintained to ensure compliance to the GDPR:

GDPR main points	Typical website installation
The right to be informed	Privacy notice webpage
The right of access	Usually, all user data are accessible after login
The right to rectification	Usually, all data are editable by the user
The right to erasure	It's possible to delete user account
The right to restrict processing	It's possible to disable user account, non-personal data generated by the user will be still visible but can't be changed anymore
The right to data portability	It is possible to provide data export in CSV format
The right to object	In the privacy notice: * You must inform individuals of their right to object "at the point of first communication" and in your privacy notice. * This must be "explicitly brought to the attention of the data subject and shall be presented clearly and separately from any other information".
Rights related to automated decision making and profiling	Usually, no automated processing of personal data on the web platform
Accountability and governance	Implement appropriate technical and organisational measures that ensure and demonstrate that you comply. This may include internal data protection policies such as staff training, internal audits of processing activities, and reviews of internal HR policies. * Maintain relevant documentation on processing activities. * Where appropriate, appoint a data protection officer. * Implement measures that meet the principles of data protection by design and data protection by default. Measures could include: - Data minimisation;

GDPR main points	Typical website installation
	<ul style="list-style-type: none"> - Pseudonymisation; - Transparency; * Allowing individuals to monitor processing; and * Creating and improving security features on an ongoing basis. * Use data protection impact assessments where appropriate.
Breach notification	You only must notify the relevant supervisory authority of a breach where it is likely to result in a risk to the rights and freedoms of individuals.

For more detailed information on our use of these technologies, please see our Privacy Policy in the Appendix 1. In case of data breach, the notification will send within 72 hours to *Commission de la protection de la vie privée*⁴, Rue de la Presse, 35, 1000 Bruxelles.

⁴ <https://www.privacycommission.be/fr/politique-vie-privee-et-disclaimer>

APPENDIX 1. PRIVACY POLICY

When available, this will be the published PRIVACY POLICY of the DUCA web portal.

If a decision is made to collect registration data, the DUCA web portal (“Site”) will abide by the following principles when handling personal information:

- We collect a small amount of personal information about our users in order to provide them with our content, products and services.
- We limit the sharing or disclosure of this personal information to our needs or compliance with applicable legal requirements.
- We give users meaningful choices over the use of their personal information.
- We strive to protect the personal information that we hold.

This Privacy Notice describes the DUCA policies with respect to the personal information that it collects through the Site or when it communicates with its users (“you” or “user”), and the choices that are available to its users. “Personal information” means any information that relates to an identified or identifiable individual.

1. Your consent

Your use of the Site signifies that you agree will all terms of this Privacy Notice. If you communicate with us and provide us with personal information, we will assume that you agree that we can use it to communicate with you. If you disagree with any part of this Privacy Notice, please do not use the Site or communicate with us.

2. Scope

This Privacy Notice applies solely to personal information that DUCA collects through the Site or through electronic communications as indicated on the Site. It does not apply to the websites of third parties, such as business partners or sponsors, to which the Site may link. DUCA does not endorse and is not responsible for the content of these third-party websites or their policies or practices.

If you provide any personal information to or through third party websites, your transaction will be subject to the terms and conditions and the privacy policies of these third-party websites.

3. What information we collect, and how we collect it

The DUCA platform is being designed to comply with the current European legislation on Data Protection.

Data voluntarily supplied by the User -- The web platform is designed to allow users browse through it without providing any contact information. However, certain areas may require, or allow for, the submission of personal information, such as when a user fills out a registration form or contacts us.

If required, the data collected and further processed are necessary for accessing the DUCA site, as well as for communication and follow-up activities. Appropriate detailed information is provided and, where required, consent for the processing of personal data is obtained before a given service is activated. Said consent may be revoked at any time, whereby the ability to use the service in question is lost.

Children -- The Site is not directed to children. The DUCA site does not knowingly collect personal information from children.

Log information -- Our server software automatically gathers general information from all users. For example: IP address, computer type, screen resolution, OS version, domain name, location, date and time of the visit, page(s) visited, time spent on a page, website from which the user came, action taken by the user when leaving our Site. Some of this information is provided directly by the user's browser, the remainder is obtained through cookies and tracking technologies.

Registration information -- Webinars and other events may be provided with the assistance of unaffiliated third-party vendors, which may require that the vendors have access to personal information such as name, company, and email address. These vendors will provide us with this information, so that we can keep track of who registers to or attends these events. In this case, the information that you provide as part of this registration will be subject to both our Privacy Notice and the applicable privacy statement posted on the vendor's website.

4. How we use this information

It is possible that the DUCA site uses personal information, as follows:

- Fulfilment of requests -- We may use your personal information to deal with your inquiries and requests, register you to our events, and send you the publications or documents that you request.
- Internal business purposes -- We may use the collected information for internal business purposes, such as for audits or to track attendance at events.
- Site operation -- We use cookies to assign a unique identifier to a user's computer.

- Statistical analysis -- We use aggregated data about Site usage (which do not identify a specific user), such as the number of users who have visited certain pages of the Sites, or how long users are spending on a particular page, in order to develop statistics on the use of our Site, so that we can understand how users interact with the Site, and improve our Site and the content, products or services that we provide through the Site.

5. To whom we disclose personal information

The DUCA Consortium Members -- We may share personal information with members of the Consortium for the purpose of creating a database for potential customer leads for the exploitation of results and assets.

Law enforcement; compliance -- We may use or disclose personal information to any third party (a) if we believe that we are required to do so by law; (b) to comply with legal process or respond to requests from governmental or public authorities; (c) to prevent, investigate, detect, or prosecute criminal offenses or attacks on the technical integrity of our Site or network; (d) to enforce our Terms and Conditions; or (e) to protect the rights, privacy, property, business, or safety of DUCA site, its business partners, employees, members, Site users, or the public. Unless this is prohibited by applicable law, we will let you know if a third-party requests access to personal information about you.

6. Right to access and rectification

You have the right to have access to the personal information that we hold about you, and to have this information corrected and amended, as defined in the [GDPR art. 12⁵](#), [15⁶](#), [16⁷](#). To do so, please contact us as indicated in section 1.a. However, please be aware that in some cases, the administrative and technical burden associated with the retrieval of archived data may be substantial. We would need to be compensated for this effort in a manner that is consistent with our actual cost.

7. Right to erasure

You have the right to request that we delete Personal Information that we hold about you. The DUCA site is being designed as compliant with the Right to Erasure as defined in the [GDPR, art. 17⁸](#). If you would like us to erase any Personal Information that we hold about you, the site will be designed to allow you to do it.

⁵ <https://gdpr-info.eu/art-12-gdpr/>

⁶ <https://gdpr-info.eu/art-15-gdpr/>

⁷ <https://gdpr-info.eu/art-16-gdpr/>

⁸ <https://gdpr-info.eu/art-17-gdpr/>

8. Right to object

You have the right to object, on grounds relating to your particular situation, at any time to processing of your personal data, as defined in the [GDPR, art. 21](#)⁹. If you would like to apply your right to object, please contact us by email at the contact details provided in section 1.a.

9. Retention of information

We will retain personal information about a user for so long as necessary to fulfil the purposes outlined in this Notice unless a longer retention period is required by law and/or regulations.

10. Security

The DUCA site is being designed to adopt commercially reasonable security measures consistent with industry practice to protect personal information under its control against loss, misuse, and alteration. However, we cannot guarantee the security of our servers, the means by which personal information is transmitted between your computer and our servers, or any personal information that we receive through or in connection with the Site.

We attempt to strike a reasonable balance between security and convenience. Emails are usually sent as unencrypted text. If misrouted or intercepted, an unencrypted email could be read easily. If there is a matter that requires high security or confidentiality, please keep us informed about the sensitivity of the information, and do not send the related information through email.

11. Jurisdiction

The DUCA project does not represent or warrant that the Site is appropriate or available for use in any particular jurisdiction. Those who choose to access the Site do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules, and regulations that apply to them.

We may limit access to the Site to any person, geographic area, or jurisdiction that we choose, in our sole discretion.

12. Inquiries and Complaints

If you have any question, comment, or complaints about this Privacy Notice, or the use, management or disclosure of personal information collected on or through our Site, please contact us at the details provided in section 1.a.

⁹ <https://gdpr-info.eu/art-21-gdpr/>

13. Updates to the Privacy Notice

We plan to update this Privacy Notice from time to time. If the changes are significant, we will post a prominent notice on this Site for a reasonable time to notify you of these changes. Unless, and until, you object in writing, by contacting us at the contact in section 1.a., all changes will apply to the existing information about you that the DUCA site already holds, and the personal information collected from the effective date of the revised Privacy Notice. Your use of our Site following the effective date of any revision will constitute your acceptance of the terms of the updated Privacy Notice.

14. How to contact The NGIatlantic.eu Platform

If you have any questions, comments, or complaints, regarding this Privacy Notice, or our privacy, security or data protection practices, please contact us by email at the details provided in section 1.a.

15. Site Operator and Data Controller

This site will be operated by UNIVERSITE PAUL SABATIER TOULOUSE III - UNIVERSITE TOULOUSE III - Paul Sabatier – UTC3 – FR, the WP leader of WP6, and all partners will also be assisting with the operation of the site.

The Data controller of the site is UTC3.

End page

