



D1.3 Appointment of DPO/D7.2 POPD - Requirement No. 2

Project acronym	ONELAB
Project number	101073924
Project Title	Orchestrating next-generation mobile modular laboratories for pandemic monitoring preparedness
Call/Topic identifier	HORIZON-CL3-2021-DRS-01-05
Project start date	October 1 st 2022 (M1)

Work package	1
Lead beneficiary	AMC
Other contributors	The consortium
Due date	March 31 st 2023
Type	Report
Dissemination level	Public
Objective	For D1.3: This deliverable will concern the appointment of a DPO. The DPO will support the evaluation of ethics risks related to the data processing activities of the project. For D7.2: The ethics risks related to the data processing activities of the proposal/project must be evaluated. This evaluation must include the support of a DPO throughout the project. Confirmation that a DPO will be appointed must be submitted as a deliverable.

Change log			
Version	Date	Author	Reason for change
0.1	13-04-2023	Laurian Jongejan	Initial draft
0.2	14-04-2023	Paul Brinkman	Comments
0.3	31-05-2023	Laurian Jongejan	Comments from consortium

Release log			
Version	Date	Name and Organisation	Role
1.0	23-06-2023	Laurian Jongejan (Amsterdam UMC)	Project manager

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1 Summary of contents

Deliverable 7.2, added by the commission, had as objective *“The ethics risks related to the data processing activities of the proposal/project must be evaluated. This evaluation must include the support of a Data Protection Officer (DPO) throughout the project. Confirmation that a DPO will be appointed must be submitted as a deliverable.”*. Deliverable 1.3, was based upon the ethics summary report, and concerns the said confirmation of appointment of a DPO. The DPO will support the evaluation of ethics risks related to the data processing activities of the project. Therefore, we decided instead of duplicating a deliverable, to combine it in one.

This deliverable therefore describes how we evaluate the ethics risks relating to the data processing activities and how these are monitored by the DPOs of every institute as well as one overarching DPO.

2 Results

ONELAB data governance processes are based on FAIR data principles and relevant Data Protection and Security Policies. This implies that data should be findable, accessible, interoperable, and reusable:

- Data can be identified persistently.
- Data is stored and access is granted through different access levels.
- Data can be combined with other data sets.
- Terms of use are provided on how data can be re-used.

Data governance in ONELAB is performed and monitored at different levels:

- At project level, where the Data Protection Officer (DPO) is responsible for data protection, in liaison with the project’s Ethics advisor (Dr. Marina Andeva, ISIG) the External Ethics Board (EEB)), and the Project Advisory Board (PAB). Its specific roles are described further in this section. The project DPO also reports to the EB, so to ensure wide control over data management procedures.
- At partner level: each partner of the consortium nominates its respective Partner Data Protection Officer (PDPO).

At both levels, main data management principles listed below are applied:

- Anonymization and Pseudonymization;
- Data Minimisation;
- Prevention of unauthorized access to all personal data, if not anonymized, and to research data by third-party;
- Informed consent;
- Adequate redundancy of backups, storage capacity and access control.

2.1 Data Protection Officers

A data protection officer is appointed at each consortium partner. The detailed list can be consulted in Table 1. Each partner’s DPO (PDPO) advises the respective organisation on compliance with the GDPR. According to the GDPR, the rights of affected persons must be guaranteed by the respective project management. Moreover, the project is equipped with a project DPO.

2.1.1 Partner Data Protection Officers (PDPOs)

In the course of the work of the project ONELAB different data are collected, processed, and shared, based on the assigned task/activity of single project partners and their responsibility to implement the tasks/activities. For this reason, each project partner researchers/staff is responsible to consult with the Data protection officer of the project partner institution for data originating from the project partner itself (hereafter known as PDPO). The PDPO then needs to review the data and approve the subsequent data processing (approve the collection, storage and sharing with other project partners of the consortium). This specific responsibility of the DPOs is on project partner level only. Therefore, without a clearance from the project DPO subsequent data processing cannot be made. A list of PDPOs and contact details can be found in Table 1.

2.1.2 The project DPO

The overarching project DPO should be a person who is very involved in the project, easily accessible, not necessarily a DPO in the institution, but a person that is knowledgeable of all the data that are shared throughout the project, especially the data produced by the clinical trials.

ONELAB DPO has the responsibility to:

1. Ensure that the DMP clearly identifies and describes data protection measures and procedures to be followed by all partners over the project implementation.
2. Liaise with PDPOs for the implementation of the procedures and protocols.
3. Consults and communicates with the Project Coordinator (PC) and the Project Advisory Board (PAB) for specific issues related to security.
4. Consults and liaises with the EEB for specific issues concerning ethics.
5. Periodically reports to the External Ethics Board (EEB).

ONELAB project Data Protection Officer is Paul Brinkman. The DPO's email address is: p.brinkman@amsterdamumc.nl

N°	Participant organisation name	Short Name	Type	Country	PDPO	Contact details
1	Amsterdam University Medical Centre	AMC	Clinical	NL	Stefania Principe	s.p.principe@amsterdamumc.nl
2	IANUS Consulting Ltd	IANUS	SME	CY	Eleni Papargyri	e.papargyri@ianus-consulting.com
3	Telesto	TEL	SME	GR	Dimitrios Drakoulis	dimitris@telesto.gr
4	Saitama Medical Centre Hospital	SMCH	Clinical	JP	Makoto Sawano M.D. Ph.D.	sawano@me.com
5	Harokopio University	HUA	University	GR	Konstantinos Leivaditis	dpo@hua.gr
6	Innsbruck University	UIBK	University	AT	Prof. Dr. Chris Mayhew	christopher.mayhew@uibk.ac.at
7	Jurrisk	JUR	SME	BE	Kathleen Vanheuerswyn	kathleen.vanheuerswyn@jurrisk.be
8	IMSPEX	IMSPEX	SME	UK	Emma Brodrick	emma@imspe.com
9	University of Cyprus	UCY	University	CY	Agapios Agapiou	agapiou.agapios@ucy.ac.cy
10	University of Pécs	UP	University	HU	Zoltán Gyöngyi Ph.D.	zoltan.gyongyi@aok.pte.hu
11	RoboScientific	ROBO	SME	UK	Ben Curtis	ben@roboscientific.com
12	Solgenium OG	SOL	SME	AT	Matthias Schlögl	m.schloegl@solgenium.com
13	Ghent University	UGent	University	BE	Maarten Dhaenens	Maarten.Dhaenens@ugent.be
14	Panou	PANOU	SME	GR	Vasilis Vlahos	Vasilis.vlahos@panou.gr
15	Institute of International Sociology	ISIG	Research	IT	Marina Andeva	andeva@isig.it
16	Johanniter Österreich Ausbildung und Forschung gemeinnützige GmbH	JOAFG	First Responders	AT	Leopold Weninger	Leopold.Weninger@johanniter.at
17	Bavarian Red Cross	BRK	First Responders	DE	Peter Fuchs	datenschutz@lgst.brk.de
18	Bioxhale Ltd	BIOX	SME	UK	Paul Thomas	cmclpt@googlemail.com
19	Municipality of Hasselt	HASS	Local Authority	BE	Regine Van Ackere	privacy@hasselt.be
20	Hungarian Red Cross	HRC	First Responders	HU	Dóra WENCZEL	dora.wenczel@voroskereszt.hu
21	Region of Western Greece	RWG	Local Authority	GR	Dimitri Karagiannis	d.karagiannis@pde.gov.gr
22	Gesellschaft für analytische Sensorsysteme mbH	GAS	SME	DE	Thomas Wortelmann	wortelmann@gas-dortmund.de

Table 1. Project partners and DPO contact details