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CiViTAS
 Cleaner and better transport in cities

DESTINATIONS



D1.1

Ethics Compliance Report

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Abstract

The Ethics Compliance Report sets out the framework through which CIVITAS DESTINATIONS will source, handle and process data in such a way that respects national law and the EC Directive on the Processing of Personal Data 95/46/EC (which entered into force 5 May 2016 and will be transposed into national law by 6 May 2018).

It has two dimensions – ethical principles and ethical law.

Ethical principles provide the basis for conducting the project at city and project levels. The obligation on all DESTINATIONS beneficiaries is to ensure that the project completes its work without breaching the integrity of the research: for example, that the evidence produced is based on sound analysis and rational argument, that the work was conducted in a professional and fair manner, that the evidence was not biased and that there was no misconduct in the way the research was undertaken.

Ethical legislation at national, European and international levels will provide the basis for any research activities in DESTINATIONS. Necessary approvals in writing will have to be obtained prior to any research on humans being undertaken in the DESTINATIONS cities.

Project Partners

Organisation	Country	Abbreviation
Horários do Funchal, Transportes Públicos	HF	PT
Agência Regional da Energia e Ambiente da Região Autónoma da Madeira	AREAM	PT
Câmara Municipal Do Funchal	CMF	PT
Secretaria Regional da Economia Turismo e Cultura	SRETC	PT
Agência Regional para o Desenvolvimento da Investigação, Tecnologia e Inovação	ARDITI	PT
Limassol Tourism Development and Promotion Company Ltd	LTC	CY
Municipality of Limassol	LIMA	CY
Stratagem Energy Ltd	STRATA	CY
Dimos Rethimnis	RETH	EL
The Research Committee of the Technical University of Crete	TUC	EL
Comune Di Rio Marina	RM	IT
Comune Di Portoferraio	PF	IT
MemEx S.R.L.	MEMEX	IT
Authority for Transport in Malta	TM	MT
Valletta Kunsilli Lokali – Valletta Local Council	VLC	MT
Universita ta' Malta	UoM	MT
Ministry of Tourism	MOT	MT
Guaguas Municipales sociedad anonima	Guaguas	ES

CINESI S.L consultoria de transport	CINESI	ES
Ayuntamiento de Las Palmas de Gran Canaria	LPGC	ES
Ingeniería Electrónica Canaria S.L	INELCAN	ES
Sociedad Municipal de Aparcamientos de Las Palmas de Gran Canaria	SAGULPA	ES
Euro Project Consult	EPC	FR
Istituto di Studi per l'Integrazione dei Sistemi	ISINNOVA	IT
European Integrated Project	EIP	RO
Sustainable Services	GV21	ES
Vectos (South) Ltd	VECTOS	UK
Conférence des régions Périphériques Maritimes d'Europe	CPMR	BE

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Glossary

GPS	Global Positioning System
EC	European Commission
ERB	Ethics Review Board
DPM	Data Protection Manager
DPC	Data Protection Certificate
IFs	Incidental Findings
IER	Internal Ethics Reviewer

1 Executive Summary

The DESTINATIONS project embeds the process of ethical compliance into its whole work programme, for the whole research and demonstration life cycle. The ethical issues within DESTINATIONS (see below) arise within the detail of the work, and not with the overall *raison d'être* of the project itself, which is part of the EC Horizon 2020 programme, Mobility for Growth sub-programme. Adopting the Commission's guidelines, the detailed ethical aspects of the project will be addressed during the developmental phases of the project. The fulfilment of ethical conditions will therefore be considered part of the Grant Agreement and not fully compliant before the Grant signature. The ethical issues relating to the project are outlined below, following an internal review at the latter proposal stage. The issues relate primarily to the involvement of humans and personal data in all areas of the project's work. DESTINATIONS will provide added value innovation to the ethical dimension of sustainable mobility through the development, application and take-up of "privacy-enhancing technologies".

DESTINATIONS will rigorously apply Horizon 2020 ethical standards in all dimensions of the project's work, in addition to national standards relating to the six DESTINATIONS cities and (where relevant) international standards. The project has a Task 1.6 within the management work package 1. The project has associated partners from China. Adopting EC guidance, the compliance standards for research by the Chinese partner will satisfy the national ethical standards applying to the DESTINATIONS coordinating city – Funchal (i.e. the research plan to be undertaken in China would be acceptable under Portuguese ethical standards). This will also guard against the (highly improbable) issue of 'ethical dumping' from an EU to a non-EU state arising.

Each beneficiary has submitted a declaration of ethical compliance to the DESTINATIONS coordinator for all of the ethical dimensions of the project. Copies of the Data Protection Certificates are contained in Annex 4 of this deliverable. This commitment to comply is also included in the project consortium agreement. In case of partners unable to sign the DPCs at this time, the Data Protection Manager has signed on their behalf a statement of ethical conformity (Annex 1). At the time of submitting this Deliverable four DPCs were missing (P4 – SRETC, P9 – RETH, P14 – TM, P15 – VLC). Remaining DPCs will be gathered and appended at the end of the project upon project ethics review. This Ethics Compliance Report will provide the baseline approval and compliance for the rest of the DESTINATIONS project.

This deliverable has been delayed partly because of time taken to retrieve signed certificates from partners and related difficulties to understand implications of ethics at the local level and the early stages of the project.

Below we outline the procedures by which ethical issues are identified and addressed within the project.

2 Ethics in the DESTINATIONS research life cycle – compliance for excellence

It is important that the ethical compliance procedures in DESTINATIONS encompass all of the stages of the work, and all stages of the DESTINATIONS innovation chain from concept development to replication in other cities and wider take-up. All work package leaders and city managers have contributed to this report and have received the necessary approvals for work in their cities/work packages (see below).

The ethical compliance in DESTINATIONS has two dimensions – ethical principles and ethical law.

- Ethical principles provide the basis for conducting the project at city and project levels. The obligation on all DESTINATIONS beneficiaries is to ensure that the project completes its work without breaching the integrity of the research: for example, that the evidence produced is based on sound analysis and rational argument, that the work was conducted in a professional and fair manner, that the evidence was not biased and that there was no misconduct in the way the research was undertaken.
- Ethical legislation at national, European and international levels will provide the basis for any research activities in DESTINATIONS. Necessary approvals in writing will have to be obtained prior to any research on humans being undertaken in the DESTINATIONS cities.

3 Identifying the areas for ethical compliance in DESTINATIONS

DESTINATIONS has to maximise the ethically beneficial impacts of its work and to take all care to avoid ethically damaging impacts. DESTINATIONS has strong ethical benefits for European society.

3.1 Addressing societal security needs – (freedom, health, employment, environment, values)

These are central features guiding the sustainable mobility objectives in all of the DESTINATIONS cities – using mobility to increase freedom, sustainable mobility to improve health, providing greater access to jobs and services across the DESTINATIONS cities and their growth poles, enhancing environmental quality for a better quality of life and sustaining the planet, and contributing to the growth of a culture of sustainable mobility values across Europe. This naturally includes increased mobility for tourists through improved tourist

services. These objectives will be embedded into the design of DESTINATIONS measures and into the evaluation process to assess the extent to which societal security needs have been enhanced by the project. This will benefit both the mobility sectors and other important areas of public welfare – such as health, safety, security, environment and well-being.

3.2 Addressing social acceptance

In addition to the analysis of the social benefits of the DESTINATIONS measures (for example by changing the modal split in favour of walking and cycling from private car use), the project will be addressing citizens and stakeholders to assess their user needs for the design of the demonstration services and their acceptance of the measures, and the primary drivers of that acceptance. In this way, the project can ensure that the measures implemented have both broad social acceptance and specific acceptance by those groups of people most affected. A strong feature of the project will be citizen and stakeholder engagement in all measures. Embedding locally created solutions into new engagement processes will provide communities with part ownership of the solution, strengthen further community involvement, provide better territorial cohesion, more inclusive governance and heightened dignity among the citizens participating.

3.3 Addressing social threats (crime, terrorism, climate change)

DESTINATIONS will address, as part of the measures, concerns relating to safety and personal security in the travelling environment. This is a particularly important part of the gender dimension of the project to ensure women (and to a lesser extent men) against the (more common) threat of personal harassment or attack. Some DESTINATIONS measures involve the joint action of planning and law enforcement in urban areas. The issue of sustainable urban mobility planning for safer, more secure environments is an important contribution that the DESTINATIONS project can make to the wider planning arena, and also to other related sectors such as security and policing and social vigilance for potential terrorist activity. The central focus of CIVITAS on achieving more environmental sustainability and more environmentally aware lifestyles in the mobility area will be a major social benefit of the project.

3.4 Benefitting all segments of society

In addition to the overall social benefits of the project, one of the defining principles of DESTINATIONS is 'Inclusion' (the other two being sustainability and growth). The project will address sustainable mobility as it impacts on all sections of society in the DESTINATIONS cities. In this way, the results of the project cannot in any way be seen to be discriminatory against certain groups of society. Specific attention will be given to address the needs of 'hard

to reach' groups to use mobility and accessibility solutions to improve the life quality of these groups. Tourist cities have developed with significant problems of social exclusion, particularly in old areas and on isolated suburban estates where xenophobic and more radicalised behaviours can result. The project will also address the needs of the dependent sectors of society in the cities, addressing their mobility needs – in particular children, the very old and the disabled community (sensory, ambient and mental). It is the objective of DESTINATIONS to use the packages of measures to break down these social barriers. While there are clearly strong ethical benefits in achieving inclusion objectives, it does mean the project engaging the more vulnerable groups in the cities and collecting qualitative and quantitative data from them and this is addressed below. More inclusive societies are more successful societies (Wilkinson et. al., 2011- The Spirit Level).

The project will need to guard against potential ethical dis-benefits arising.

3.5 Privacy and data protection

This aspect is the major ethical issue for DESTINATIONS to address. In all of the cities, data from a host of sources will be collected, analysed, stored and reported/disseminated. A significant proportion of this data are information provided by people about their lives and their attitudes, perceptions and expectations; and data collected remotely that monitors their movements (for example in traffic counts, through GPS tracking, surveillance cameras, access control) or service use (registration, booking, validation, goods pick up, gate access, credit points, etc.). As stated above, the data will cover all social groups including those most vulnerable and dependent. It is a primary responsibility of the project to ensure that the ethics of personal privacy and dignity, and data protection are not compromised in any way.

3.6 Compliance with the European Charter of fundamental Rights

The Charter of Fundamental Rights of the EU states (legally binding since 2009) the fundamental rights of humans protected in the EU: Dignity, Freedoms, Equality, Solidarity, Citizens' Rights, and Justice. The Charter is a very modern codification and includes 'third generation' fundamental rights, such as data protection. This right to data protection builds on Article 8 of the Convention for the protection of rights defining respect for privacy and Article 2 of the respective Protocol defining the right to freedom of movement. The project will ensure full compliance with the Charter.

4 Ethics management and review

4.1 Internal Ethics Review Board (ERB)

DESTINATIONS has a specific ethics management and review process embedded in the overall management structure of the project; in Task 1.6. The Project has appointed Professor Laurie Pickup of Vectos as the Internal Ethics Reviewer within a rigorous ethics management process. He will chair an ERB comprising of one representative from each of the DESTINATIONS cities (one of whom is the project coordinator), and the Data Protection Manager (DPM), Giorgio Ambrosino (see below). The ERB will meet periodically at consortium meetings on a six monthly basis and, where necessary, through ad hoc conference calls to handle specific issues on a one to one basis. The objectives of the ERB are to:

- Implement this Ethics Compliance Report and to update and refine this Deliverable as appropriate through the project
- Ensure that all necessary national, EU and International ethics approvals and opinions are obtained in all 6 cities prior to the commencement of the work, during the planning phase (for example national data protection authorities or under Directive 95/46 which will become national law 6 May 2018).
- Mentor all project beneficiaries on the ethical obligations of the project at the kick-off meeting and re-emphasize at subsequent consortium meetings.
- Conduct periodic reviews of ethics in preparation for EC ethical audits and produce full documentation for INEA observation.

Periodic reporting to INEA will be produced on ethics compliance and issues that have arisen and been addressed, plus anticipated issues for later in the project. These reports will start with this Deliverable (submitted, Month 1) and then have the same reporting cycle as for the overall management reporting.

The ethical conduct of the Chinese organisations in their collaboration with DESTINATIONS partners, must comply with the terms of the relevant EC Directives within which the rest of the DESTINATIONS consortium are bound in conducting the 'Project' (for example but not exclusively relating to the collection, analysis, holding and removal of personal data).

The ERB will incorporate the work of the H2020 project: 'Promoting research integrity' (which commenced in 2015) and build this state of the art intelligence into our work.

Horarios Funchal, the DESTINATIONS coordinator, will provide and store the necessary documentation and hold the ethics approval documents from all beneficiaries: they will support the ERB and manage the 'formal opinions' that are received from national, EU or international bodies in the case of an Ethics review by the Commission. MemEx drafted the Data Protection Certificate templates and coordinated their completion by the partners, in their lead role of the Data Management Plan. They will bring to the attention of the Internal Ethics Reviewer issues

arising inside the work packages that require attention. All beneficiaries are also able to bring ethical issues to the attention of the Internal Ethics Reviewer. Issues would be discussed by the ERB and the necessary actions taken to redress the situation. In some cases, this may entail adapting the research methodology to keep to ethical rules. Horarios Funchal will act as the secretariat for all ERB meetings and prepare minutes and agendas. Issues arising from the ERB will be reported to the project Steering Committee by the Internal Ethics Reviewer.

4.2 DESTINATIONS Data Controller

The DESTINATIONS Data Protection Manager is Giorgio Ambrosino of MEMEX; who is an international expert in data and privacy issues. He will work within Directive 95/46/EC and 'Article 29 working group 8/2010 opinion' and the conditions of Decision 2013/743/EU. He has submitted a confirmation, on behalf of all beneficiaries that all data collected in the project will be according to ethical rules specified in this EC legislation and respective national legislations (presented in Section 7) The DPM will be an important component of the ERB. Specific issues for data collection are listed below

5 DESTINATIONS ethical appraisal

5.1 The DESTINATIONS measures: ethical issues to be addressed

Table 1 below summarises the likely ethical issues arising from the DESTINATIONS measures and the necessary compliance actions. In all cases where compliance is sought, the application/description of the data to be collected/sourced will be supported by detail of the data collection instruments (e.g. a survey questionnaire) and the method by which data are collected, including any permissions (for example from parents of children who will give them a simple questionnaire to complete or have completed for them). The detailed list of data collected/managed by DESTINATIONS project and the related procedure for collecting, storing and using data will be faced in the Data Management Plan (DMP). The specific details of the information required for compliance approval have been provided by the EC and by the DESTINATIONS national authorities.

Table 1: DESTINATIONS measures – Table of ethical issues

WP	Measure	Involvement of human participants
2	(MAD 2.2) (RET2.2) (LPA 2.2) Smart metering and crowdsourcing	Passenger counting. Crowdsourcing info. Survey for evaluation of the measure and user acceptance

3	(LPA 3.1) - Attractive, safe and accessible public space at major attraction in Rethymno	Survey for user needs analysis Stakeholder and users focus groups reports Citizens' opinions on new services collated and assessed (i.e. questionnaires)
3	(ELB 3.1) – Increase level of safety of pedestrian crossings in Elba	Perceived (surveys) changes in road safety
3	(LIM 3.1) – Increase cycling and walking in combination with special interest tourist activities as an integrated product in Limassol	Data collection on attractiveness of new services
3	(MAD 3.1) – Innovative solutions for safe and secure public spaces in Madeira	Data provided by new road safety monitoring centre
3	(LPA 3.1) – Attractive, safe and accessible public space at major attraction in Las Palmas	Visitor and employees travel plan surveys
3	(LIM 3.4) – Attractive and accessible public spaces to promote intermodal leisure trips in Limassol	Data collected from tourists on usage of improved services
3	(MAD 3.2) – School and foreign students awareness campaign package in Madeira	Data collected on reduced average speed of traffic calming and impact on road safety statistics
3	(RET 3.2) – Mobility plan for schools/university's communities in Rethymno	Behaviour change surveys: before and after. Children and parents
3	(LIM 3.3) – Safe routes to school in Limassol	Data collected on usage of preferential “safer” routes
4	(RET 4.2) – Building a sharing mobility culture in Rethymno	Web-based User platform will provide data on take up of sustainable modes
4	(ELB 4.1) – Shared ELBA Mobility Agency in Elba	Take up monitored through data from e-mobility and ICT services
4	(LIM 4.1) – eCar Rental connecting Limassol town with airport and port	Data on the take up of new eCar service recorded
4	(LPA 4.1) – Public e-bike system in Las Palmas	Data taken from bike sharing system to analyse demographics of users
4	(LIM 4.2) – Expansion of public bike sharing system, include e-bikes in Limassol	Data taken from bike sharing system to analyse demographics of users
4	(MAL 4.1) – Promoting e-bike sharing and car sharing	Data taken from bike sharing system to analyse demographics of users

4	(MAD 4.1) – Promote the uptake of clean vehicles by fleet operators in Madeira	User surveys will assess effectiveness incentives, and system data will show overall take up
4	(LPA 4.2) – Fast charging EV in Las Palmas	MOBILITY app will provide usage data
4	(RET 4.1) – Uptake of electric vehicles by fleet operators in Rethymno	User surveys will assess effectiveness incentives, and system data will show overall take up
4	(LIM 4.3) – Promote the uptake of electric vehicles, campaign on e-mobility	User surveys will assess effectiveness incentives, and system data will show overall take up
5	(ELB 5.2, LPA 5.2, LIM 5.1, MAD 5.1, MAL 5.1, RETH 5.1) SULPs	Surveys to collect data for Sulp, user needs analysis for logistics demo measures
6	(MAD 6.3) - Mobility management planning tools for tourists and local tourism operators	Surveys of hotel guests on impact of measures
6	(RET 6.1) - Sustainable mobility agency for tourists/visitors in Rethymno	User feedback data taken from online platform – mobility agency. Routes taken by users of mobile phone app
6	(ELB 6.1) - Combined products for tourism and mobility: the accommodation and mobility package in Elba	Surveys of tourists and residents of impact and responsiveness of shared services
6	(LIM 6.1) - Awareness on the use of sustainable mobility modes for leisure trips in Limassol	Surveys to determine the impact of campaigns
6	Promoting sustainable mobility and travel plans in Malta	Data on number of downloads of app, regular users, most popular services
6	(MAD 6.1) - Gamification as a way to induce behavioural change in Mobility and (MAD 6.2) - Green credits: A Business Model for Mobility, Sustainability and Tourism in Madeira	Data collected from PT users on attractiveness of interactive bus stop
6	(LPA 6.1) - Green credits scheme in Las Palmas	User data and sites of where points earned / exchanged taken from relevant app / web portal
6	(LIM 6.3) - Bicycle challenge: competition between employees of companies in Limassol	Before and after surveys of employees to derive attitudinal change
6	(MAL 6.1) - Green Mobility Hotel Award in Malta	User data and sites of where points earned / exchanged taken from relevant app / web portal

6	(RET 6.3) - Green mobility card in Rethymno	User data and sites of where points earned / exchanged taken from relevant app / web portal
6	(MAD 6.4) - Low emission zones and smart parking management in Madeira	Data on traffic calming drawn from mobility sensors
6	(LIM 6.4) - Smart parking guidance system in Limassol	User data drawn from smart parking app
6	(MAL 6.2) - Introducing Low Emission Zones in Malta	Data drawn from traffic cameras/ automated number plate recognition and manual counts to determine reduction in vehicle numbers
6	(RET 6.2) - Low emission zones study in Rethymno	Public consultation process will derive quantitative and qualitative data
7	(ELB 7.2, ELB 7.3, LPA 7.3, LPA 7.4, LIM 7.3, LIM 7.4, MAD 7.3, MAD 7.4) Real time mobility and tourist information and payment services	User needs analysis, validation and transit data, events collected.
9	Ex-ante evaluation (BAU) Ex-post evaluation	Pertaining to the rows describing the specific measures

6 Personal data on humans in DESTINATIONS

6.1 Types of data to be used in the project

DESTINATIONS has the following provisions to ensure privacy and data security.

Secondary data: all of the DESTINATIONS cities will use a variety of data from secondary sources. These data sources are primarily collected for public use and for multiple uses – such as local population census material. The city authority collects other data for local planning purposes, for example travel pattern data; which are for multiple uses within the city authority, but which require permission for wider use. This data will be essential for establishing the local contexts within which the DESTINATIONS measures will be implemented. They can provide essential data for sampling people to ensure a full cross-section of city areas or types of people are surveyed (for example by age and gender). This Deliverable can confirm that all of this data has received the correct, documented approval for use in analysis, where approval was necessary.

Primary data: sampling for quantitative analysis – for sampling the population as a whole, then it must be assured that the approach can generate a sample that is random and of a size that can be analysed with the ability to make statistical inference for the overall sample and for

the most significant sub-sample breakdowns; in order to ensure accuracy and integrity. There should be the ability to assess the sampling bias in this respect and to implement corrective actions where bias is demonstrated. In some countries, ethical guidelines exist for market research and data privacy (for example the UK Department of Transport's Magenta book). Where this is not available, the Market Research Society Code of Conduct¹ and the ISO 20252² will provide the DESTINATIONS ethical guidance.

Ethical guidance for primary data collection: ISO 20252 provides the quality and ethical standards for the end-to-end process of a research project such as DESTINATIONS:

- Research process management
- Managing the executive elements of research
- Data collection
- Data management and processing
- Reporting on research projects

These sources provide detailed ethical guidance for example on the recruitment of hard to reach groups, children, elderly dependents, ethnic minorities and refugees etc. DESTINATIONS will produce standard templates and statements for customised translation for recruitment and selection approvals and for informed consent. It will state clearly the data results will be publicly available.

New data sources: In addition to more conventional surveys and focus groups, information on humans in DESTINATIONS will use a wider range of more sophisticated data collection instruments, many of which provide open data sources or data for multiple uses:

- Automatic devices including real time surveillance (counters, cameras, scanners, GPS trackers);
- Systems for facial recognition in real time in an unrestricted environment;
- Video surveillance systems across urban areas/interchanges (see Annex 4);
- Smart systems and technologies – mobile electronic tagging, validation, transit data/transactions, events/data service collected by AVM/AVL, service use (registration, booking, access/use, etc.), green credits, etc.;
- Crowdsourcing;
- Automatic number plate recognition;
- Drone surveillance.

¹ https://www.mrs.org.uk/standards/code_of_conduct/

² <https://www.iso.org/obp/ui/#iso:std:iso:20252:ed-2:v1:en>

It will be essential to get the necessary clearances to use these data sources, some of which many argue can be intrusive to personal privacy and yet supportive of personal safety and security. Having a clear ethical strategy on the use of these data will be important for a number of DESTINATIONS measures relating to vehicle access control.

Analysis, data storage and dissemination, there are two key rules: (i) That it is well documented and approved who has access to use and receive the information and (ii) there will be no dissemination of personal information without written consent. The analysis of data will not reveal or publish the intelligence from specific respondents to questionnaires or interviews/discussions. The respondents will be anonymous codes and the addresses coded by broad areas to prevent tracking (there is a good body of experience on how to avoid data tracking). Codes will be used to mark specific individuals in order to track their responses before and after a CIVITAS measure and then used in the 'panel analysis'. Following the analysis, the codes will be erased and the data stored as anonymous. In all cases, the DPM will monitor and document all compliances in this respect.

6.2 Mission creep and Incidental findings

The DPM will also assess whether any analysis is guilty of 'Mission creep'; that is the use of the data beyond the permission that was given. Incidental Findings (IFs) refer to a finding uncovered during the analysis of personal data that is beyond the objectives and scope of the research; that cannot be anticipated in the design of research protocols for the research. These are most common in medical research but data, for example on the passage of personal relationships may arise in the analysis of panel waves or in the GPS tracking of activity patterns. In DESTINATIONS, there will be research into the health and well-being impacts of the sustainable mobility measures and data will be collected across the 6 sites on these indicators and measurements – for example physical activity levels and stated responses from participants on their medical histories (for example respiratory illness and disease, sedentary behaviour and obesity issues etc.) and attitudes to active mobility. The project therefore needs to ensure complete protection of individual data in this area and the non-disclosure of any possible IFs that may arise.

If the data are anonymous, then IFs will not arise. In the case of personalised data such as for health variables, the use of the data for subsequent analysis for other purposes needs to be protected or made clear in the original consent forms agreed to by the individual research participants.

In DESTINATIONS, the project will use the IF guidelines published by the World Health Organisation (WHO). The partner responsible for the task on health and well-being impacts is European Integrated Projects (EIP) and the DPM will ensure the full approval and protection of personal data and this will be clear in the consent forms and information sheets provided to prospective participants at the outset of the research. The DPM will also ensure that

personalised data on activity patterns will receive full approval and opinion to ensure the data are protected during the project and afterwards.

6.3 'Anonymous' and 'Personal' data

In each of the DESTINATIONS cities, evaluation data will be collected that is both anonymous and personalised. The appropriate Data Protection Certificates and Approvals (DPCs) are annexed to this report. These cover all possible data types. The precise data to be collected by each site will be specified in the Data Management Plan by Month 8 and captured in the Evaluation Plan complete.

Anonymous data

Data will be collected to assess the impacts of measures based on 'before and after' surveys. In these surveys, the data (for example on the travel patterns, attitudes and socio-demographic characteristics of the respondents) will not code specific people or households. For example, the household or person coded 001 in the before survey will not be the same household or person coded 001 in the after survey. Analysis will focus on the comparative statistics of the two samples of their respective populations: The analysis is anonymous.

Furthermore it is important that the data does not allow for the identification of the individual or household locations of the respondents; or to make it possible to identify them from an analysis of their activity patterns (such as tracking through GPS data logging). DESTINATIONS has a policy to only code the district or neighbourhood area in which the respondent lives. This will not be defined as the postal code district if that code is at the level of detail of a few streets only – the neighbourhood level will be the code for measurement.

Personalised data

Some measures will collect data to measure impacts in the form of 'panels' of people. A panel is a group of people who are 'tracked' through the evaluation and asked to complete repeat questionnaire surveys, or requested to take repeated exercises and tests at periodic intervals or 'waves'. The strength of a panel is that you are tracking the mobility decisions made by particular individuals throughout the measure – from before implementation to perhaps one year afterwards. In this case it is essential to keep specific codes for specific individuals and to hold a database with full contact details of all panel members.

6.4 The policy in DESTINATIONS

This will be for the ownership of the data to be solely with the 6 city authorities. It will not be retained by the agencies that collect or analyse the data on their behalf and all data files will be handed over to the authorities once the analysis is completed. DESTINATIONS partners from outside of the member states where the data are collected, but who are involved in the

holding, analysis and evaluation of the data will sign an appropriate agreement with each of the cities involved to confirm their compliance with the specific DPC and 'Opinions' that relate to the data they will collect, hold and use. These agreements will be managed by the DPM during the project.

All data collected, where necessary under national law, will need a Data Protection Certificate (DPC). It must also conform to the EC Data Protection Directive (which has entered into force in May 2016 and will be transposed into national law in May 2018). At the start of the DESTINATIONS project, the Internal Ethics Reviewer (IER), the Data Protection Manager (DPM) and the Evaluation work package leader, ISINNOVA, have reviewed all of the data requirements and data collection mechanisms throughout the project (summarised in Table 1). For each data collection element, where required, relevant DPC's are provided in Annex 4.

In addition, it is common in situations where a DPC is mandatory (or even where a DPC is not required), for the Data Protection Authority to provide an 'opinion' as to the detailed elements they require for data collection, storage and use. The DESTINATIONS DPM will ensure that the details listed in the respective 'opinion statements' are complied with in the project.

The project coordinator will hold a log of all of the DPCs and 'Opinions' for the DPM and will ensure the full conformity of the project with these requirements. Where any partner deviates from these requirements, the DPM will bring the matter to the immediate notice of the project coordinator. All partners involved in data collection, storage and use will be in regular and ad hoc contact with the DPM for advice, to ensure that the risks of non-compliance are minimal. The project will define a common approach under the revised EC Directive and all sites, as public authorities engaged in 'scientific research' will abide by these conditions.

7 Ethical approval procedures, certification and opinion in each of the destinations sites

The necessary DPCs (except for the four partners cited in section 1) and the supporting 'Opinions' received are contained in the annexes to this Deliverable. DPCs may be necessary from:

- The data protection officer of each of the DESTINATIONS public authorities.
- The respective national data protection agencies

- The 'internal supplementary opinions' provided by the DESTINATIONS DPM. The DPM also has the responsibility to ensure full project conformity with the EC Directive 95/46 on data protection, on which a common DESTINATIONS compliance conditions will be established.

The data protection authorities and legislation affecting each of the DESTINATIONS sites will be as follows.

Funchal

Each specific procedure to collect personal data requires specific authorization from the PORTUGUESE NATIONAL DATA PROTECTION COMMISSION (PDPC). This approval is necessary relating to the management, storage and processing of specific personal data (questionnaires, data base etc.). In contrast to personal data, databases with anonymous data have no need for PDPC authorization. There is no data protection officer in the municipality of Funchal or within the public transport operator. Authorisation of personal data can be a lengthy process, in the experience of the local partners

Elba

The national authority in Italy is the national authority for guaranteeing personal data protection (Garante per la protezione dei dati personali). The appropriate national law for data protection in Italy is the 'Codice in materia di protezione dei dati personali' (196/2003). This will be shortly revised to conform to the new revisions to the EC Directive. At the local site level in Rio and Portoferraio, a Data Protection Officer is appointed to ensure compliance among all local organisations.

Las Palmas

The national authority for guaranteeing personal data protection is the "Agencia Espanola de Proteccion de datos".

No approval is required for anonymous data. The DPM will advise for this data.

Personalised data requires the compliance with Article 5 (Derecho a informacion y reconocida de datos) of the national data protection law of 1999 (15/1999 – Proteccion de datos de Caracter Personal). This requires that people to be surveyed must be informed (explicitly, precisely and unequivocally) of the existence of a file, personal data treatment, method of data collection, purpose of use, possibility to access the information (amend and remove it) and the contact of the person responsible for it.

Limassol

No approval is required for anonymous data. The DPM will advise for this data. Regarding personal data, the national authority for guaranteeing personal data protection is the 'Office of the Commissioner for Personal Data protection'. The legal base, including the terms of the EC Directive is contained in the national Data Protection Law of 2001 (amended law 37(1), 2003).

In addition the Electronic communications and postal services law (112(1)/2004) that addresses unsolicited communications.

Rethymno

The Hellenic Data Protection Authority (HDPA) is the national body responsible for protecting individual freedoms against the processing of personal data. Additionally there is the Hellenic Authority for Communication Security and Privacy (ADAE) for information communicated by post, telecommunications and Internet. The legal base is the laws 2472/1997 and 3471/2006EU, incorporating the Directives 95/46/EC on data protection and 2002/58/EC on 'e-privacy'. For personalised data, the 'controller' of the data must notify the Authority and the data will be registered in the 'Files and data processing register'.

Malta

The Data Protection Act, Chapter 440 of the Laws of Malta, regulates data protection under Maltese law. The notion of 'anonymised data' is not regulated under the said Act. Hence, no approval certificate is required in order to collect such data. The Maltese Data Protection Act distinguishes between 'personal data' and "sensitive personal data". In terms of 'personalised data', which shall be collected for the purposes of the DESTINATIONS Project, does not constitute 'sensitive personal data' in terms of the Data Protection Act. Nevertheless, the provisions of the Data Protection Act do apply to this exercise of data collection that shall be conducted for the purposes of this Project. Personal data may only be processed where the data subject has unambiguously given his/her consent to the processing of such data. In this regard, during the generation of surveys and other data collection exercises we will ensure that the subject gives his/her consent by means of a pre-prepared form which is then signed by the subject. We will also follow the rules and procedures outlined in the Act that cover the collection of such data.

8 Final ethics analysis report

At the end of the project, all of the ethical issues raised in the ex-ante project assessment in 2016 will be analysed and presented in Deliverable 1.5. The strong positive social benefits anticipated will be described with quantitative evidence. The analysis will also discuss any potential adverse ethical impacts that the project may have initiated and the discussions held to remedy the problem in the future. The report will document the process of ethical review in the project, the challenges faced, their impact and the solutions found to address them. Finally the report will provide recommendations to CIVITAS on forward strategies for addressing the ethical dimension of the Programme, and to the DESTINATIONS cities for a forward strategy.

The ethical compliance and management of the DESTINATIONS project is essential and, within a multi-national, cross- continental project, not straightforward. The above text has

described how the project will carefully manage and monitor the ethical dimension of the project, not only ensuring full compliance with standards, opinion and guidance, but also providing best practice to the CIVITAS community on how to use the ethical dimension of the project to add social value and innovation.

9 Annexes

9.1 Annex 1 - Statement of Ethical conformity by the Data Protection Manager



Via Cairoli, 30 - 57123 Livorno (Italy) • Tel. +39 0586 211646 – Fax +39 0586 211777 • memex@memexitaly.it • www.memexitaly.it • P.I. 01121180499

Statement

The undersigned Giorgio Ambrosino, as the Data Protection Manager for the CIVITAS DESTINATIONS project, confirms that "all data collection and processing will be carried out according to EU and national legislation".

Giorgio Ambrosino


Livorno, April 26th 2016

9.2 Annex 2: Informed consent templates

MEMEX to complete

The informed consent form consists of two parts:

- The information sheet and
- The consent certificate.

The two templates below are customized to meet the specific needs of the project:

- To sample dependents such as children, the very old and those with dependent disability;
- Independent human subjects.

INFORMED CONSENT TEMPLATE

INDEPENDENT HUMAN SUBJECTS

- Data collected in the <survey> will be managed by <organization> in accordance with national and international rules on privacy data protection <indicated the specific national rule applicable> through the here detailed method/procedure <to be detailed>.
- Data can be shared within the Destinations consortium assuring the compliance with international rules on privacy data protection and project rules on ethics appraisal. Collected data will be used only for the purpose of elaboration and production of Destinations project's outputs and reports.
- Destinations consortium is responsible towards the EU Commission (H2020 Horizon) which has co-funded the initiative. Then the outputs and reports produced by Destinations project will be make accessible to EU Commission. Extract of these outputs/reports can be publicly available. Furthermore the Destinations consortium can be requested by EC to produce evidence of data collected upon request.
- Data will be elaborated in an anonymous way and/or under aggregated form <or alternatively when applicable, when data will be used in a personalized form, Data will be used to track the personal behaviour (i.e. attitude/use of Public Transport and sustainable, etc.)> in accordance with the data privacy rules and restricted to Destinations project's purpose. Then relations of collected data with any other personal preferences or social attitude not directly dealing with mobility behaviour will be left out. Any results that will be involuntary produced/found during data elaboration will be avoided by the adoption of appropriate Destinations project's rules against Incidental Findings.

- The signing person declares to have been duly informed about the Destinations project purpose and use of the collected data and to be aware of the impacts of providing his/her informed consent.

INFORMED CONSENT TEMPLATE

DEPENDENTS SAMPLE

This data collection campaign is carried out by a sample of population which has been selected under a fair and random process; the size of the sample has been defined to make statistical inference.

Data collected in the <survey> will be managed by <organization> in accordance with national and international rules on privacy data protection <indicated the specific national rule applicable> through the here detailed method/procedure <to be detailed>.

Data can be shared within the Destinations consortium assuring the compliance with international rules on privacy data protection and project rules on ethics appraisal. Collected data will be used only for the purpose of elaboration and production of Destinations project's outputs and reports.

Destinations consortium is responsible towards the EU Commission (H2020 Horizon) which has co-funded the initiative. Then the outputs and reports produced by Destinations project will be make accessible to EU Commission. Extract of these outputs/reports can be publicly available. Furthermore the Destinations consortium can be requested by EC to produce evidence of data collected upon request.

Data will be elaborated in an anonymous way and/or under aggregated form <or alternatively when applicable, when data will be used in a personalized form, Data will be used to track the personal behaviour (i.e. attitude/use of Public Transport and sustainable, etc.)> in accordance with the data privacy rules and restricted to Destinations project's purpose. Then relations of collected data with any other personal preferences or social attitude not directly dealing with mobility behaviour will be left out. Any results that will be involuntary produced/found during data elaboration will be avoided by the adoption of appropriate Destinations project's rules against Incidental Findings.

The signing person declares to have been duly informed about the Destinations project purpose, the criteria of sampling and the use of the collected data and to be aware of the impacts of providing his/her informed consent.

9.3 Annex 3: Guidelines for defining ethical strategy for the management of video surveillance and image recognition data

The management of video surveillance or images recognition data collected during Destinations project demo measures has to comply with:

- European regulation which for now consists of the Directive 95/46/Ce (in the upcoming future this Directive will be replaced by the new Directive 2016/680 promulgated on the 27th of April 2016 once it will be adopted at national level by May 2018 then during the Destinations project lifetime);
- National regulation on data privacy, where applicable (i.e. in Italy, Spain and others).

The management of video surveillance data deals with the following procedures:

- Images recording;
- Data storing;
- Images access.

In the following some guidelines Destinations sites can check and adapt to their national regulation and specific requirements:

- Each organization (at least when it is over a predefined size of dependents) responsible of the management of video surveillance data must nominate a “Data Protection Officer” who is responsible, in general, of guaranteeing the compliance to privacy rules;
- Before the activation of video surveillance system, the organization must communicate to the National Authority the decision to start the system. An authorization (including the release of a “sign-off” certification) must be required;
- Data must be cancelled after a max allowed time (i.e. in Italy 72 hours);

- Before their cancellation, images must be accessible only to Data Protection Officer upon request of allowed Authorities (i.e. Police, Magistrate);
- Images recording and data storing must be carried out preventing the possibilities to use it for tracking of personal behaviour;
- Events of “data breaches” which could affect the responsible organization must be promptly communicated to the National Authority;
- The video surveillance system must be technically designed to guarantee the presence of tools/procedures allowing data protection and compliance with privacy regulation (“privacy by design”);
- A privacy impacts assessment plan must be elaborated and make available at organizational level.

9.4 Annex 4: Data Protection Certificates

Please find below the DPCs of the following 24 partners.

	Legal name	Country
1 – HF	HORARIOS DO FUNCHAL TRANSPORTES PUBLICOS SA	PT
2 - AREAM	AGENCIA REGIONAL DA ENERGIA E AMBIENTE DA REGIAO AUTONOMA DA MADEIRA	PT
3 - CMF	CAMARA MUNICIPAL DO FUNCHAL	PT
5 - ARDITI	ARDITI - AGENCIA REGIONAL PARA O DESENVOLVIMENTO DA INVESTIGACAO, TECNOLOGIA E INOVACAO - ASSOCIACAO	PT
6 - LTC	ETAIRIA TOURISTIKIS ANAPTIXIS KAI PROVOLIS PERIFERIAS LEMESOU LIMITED	CY
7 - LIMA	LIMASSOL MUNICIPALITY	CY
8 - STRATA	STRATAGEM ENERGY LTD	CY
10 - TUC	THE RESEARCH COMMITTEE OF THE TECHNICAL UNIVERSITY OF CRETE	EL
11 - RM	COMUNE DI RIO MARINA	IT
12 - PF	COMUNE DI PORTOFERRAIO	IT
13 - MEMEX	MEMEX S.R.L.	IT
16 - UOM	UNIVERSITA TA MALTA	MT
17 - MOT	MINISTRY OF TOURISM	MT
18 - GUAGUAS	GUAGUAS MUNICIPALES SOCIEDAD ANONIMA	ES
19 - CINESI	CINESI SL	ES
20 - LPGC	AYUTAMIENTO DE LAS PALMAS DE GRAN CANARIA	ES
21 - INELCAN	INGENIERIA ELECTRONICA CANARIA SL	ES

22 - SAGULPA	SOCIEDAD MUNICIPAL DE APARCAMIENTOS DE LAS PALMAS DE GRAN CANARIA SA	ES
23 - EPC	EURO PROJECT CONSULT	FR
24 - ISINNOVA	ISTITUTO DI STUDI PER L'INTEGRAZIONE DEI SISTEMI SC	IT
25 - EIP	EUROPEAN INTEGRATED PROJECT	RO
26 - GV21	SUSTAINABLE SERVICES SL	ES
27 - VECTOS	VECTOS (SOUTH) LIMITED	UK
28 - CPMR	CONFERENCE DES REGIONS PERIPHERIQUES MARITIMES D EUROPE - ASSOCIATION	FR



To:

CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Alejandro Marcelino Gonçalves Gonçalves, as Horários do Funchal, Transportes Públicos SA Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

HORÁRIOS DO FUNCHAL

TRANSPORTES PÚBLICOS, S. A.

O CONSELHO DE ADMINISTRAÇÃO

Funchal, 02-01-2017

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned *Filipe Oliveira*, as *AREAM* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Funchal, 03 January 2016

AREAM
Agência Regional da Energia e Ambiente
da Região Autónoma da Madeira
A Administração



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Domingos Manuel Martins Rodrigues, as *Municipality of Funchal* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.




Funchal, 09 January 2017

Edif. Madeira Tecnopolo • Piso 2
Caminho da Penteadá
9020-105 Funchal • Portugal
tel. +351 291 721220 •
arditi@arditi.pt • www.arditi.pt



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Lúcio Quintal, as Data Protection and project manager responsible for the CIVITAS DESTINATIONS project at *ARDITI*, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.



Funchal, 2nd of January 2017



Limassol
TOURISM COMPANY

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Maria Stylianou, as Limassol Tourism Company Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Εταιρεία Τουριστικής Ανάπτυξης και
Προβολής Περιφέρειας Λεμεσού Λτδ
Τ.Θ. 55699
3781 Λεμεσός

Limassol, 2 January 2017

Limassol Tourism Development and Promotion Company Ltd

170 Franklin Roosevelt, Limassol Chamber House, 2nd Floor, P.O.Box 55699, 3781 Limassol, Cyprus
Tel: 2587 7350, Fax: 2566 1655, E-mail: m.stylianou@limassolchamber.eu



ΔΗΜΟΣ ΛΕΜΕΣΟΥ
LEMESOS (LIMASSOL)
MUNICIPALITY

Δημοτικό Μέγαρο
Αρχιεπισκόπου Κυπριανού 23
Τ.Κ. 50089, 3600 Λεμεσός, ΚΥΠΡΟΣ
Τηλ: +357 - 25 88 43 00
Τέλεφαξ: +357 - 25 36 54 97
<http://www.limassolmunicipal.com.cy>
E-mail: limassol.municipal@cytanet.com.cy

Φακ.:

Ref.:

Town Hall
23, Arch. Kyprianos Str.
P.O.Box 50089, CY-3600 Lemesos (Limassol), CYPRUS
Tel: +357 - 25 88 43 00
Telefax: +357 - 25 36 54 97
<http://www.limassolmunicipal.com.cy>
E-mail: limassol.municipal@cytanet.com.cy

To:

CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Nicos Nicolaides, as *Limassol Municipality* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirm to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Limassol, 3 January 2017

To:
Claudio Mantero
Giorgio Ambrosino

Declaration

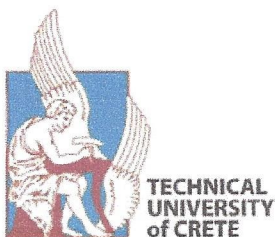
The undersigned Panos Antoniades, as Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.



STRATAGEM ENERGY LTD

Limassol, December 2016



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned *Professor Theocharis Tsoutsos*, as the *Technical University of Crete* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.



Chania, 5/01/2017



COMUNE DI RIO MARINA
PROVINCIA DI LIVORNO

SERVIZIO 4 -UFFICIO PROGETTI EUROPEI
TEL. 0565/925533 FAX 0565/924151
PIAZZA S. D'ACQUISTO, 7 - 57038 - RIO MARINA (LI)
C.F. 82001270493 - P.I. 00418180493

To:
Claudio Mantero
Giorgio Ambrosino

Declaration

The undersigned *Adriana Mercantelli*, as *Rio Marina municipality* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Arch. Adriana Mercantelli

Rio Marina, December 2016





COMUNE DI PORTOFERRAIO
Provincia di Livorno
AREA 3 - Gestione del Territorio e Opere Pubbliche

Sede Municipale Via Garibaldi - 57037 PORTOFERRAIO - Tel. 0565/937111 - Fax 916391 - Cod. fisc. 82001370491 E MAIL:portoferraio.lpp@elbalink.it

To:
Claudio Mantero
Giorgio Ambrosino

Declaration

The undersigned *Mauro Parigi*, as *Portoferraio municipality* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Mauro Parigi





MemEx

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To:

Mr. Claudio Mantero

CIVITAS DESTINATIONS Project Coordinator

Mr. Giorgio Ambrosino

CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Antonio Liberato, as *MEMEX* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

MEMEX
Via Cairoli 30
57123 LIVORNO
P.I.V.A. 01121180499

Livorno, 05 January 2017



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Prof Alfred J Vella, as *University of Malta* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

A handwritten signature in black ink, appearing to read 'Alfred Vella'.

University of Malta
4th January 2017





MINISTRY FOR TOURISM
233, REPUBLIC STREET, VALLETTA VLT 1116, MALTA

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned, Moira Pisani, as Ministry for Tourism, Data Protection officer Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

MOIRA PISANI
DIRECTOR, POLICY DEVELOPMENT AND
PROGRAMME IMPLEMENTATION DIRECTORATE,
MINISTRY FOR TOURISM

Ministry for Tourism
30th December 2016

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Jose Efigenio Hernández Cabrera, as *Guaguas Municipales* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.



09/01/2017



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned **Francesc Xandri González**, as *CINESI SLU Consultoria de Transport* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

CINESI SLU
NIF. B-01156816
~~Avda. Pompeu Fabra, 12~~
08024 BARCELONA

Barcelona, 20th January 2017



**Ayuntamiento
de Las Palmas**
de Gran Canaria

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned **José Eduardo Ramírez Hermoso**, as *AYUNTAMIENTO DE LAS PALMAS DE GRAN CANARIA* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Las Palmas de Gran Canaria, 20 de enero de 2017



To:
Claudio Mantero
Giorgio Ambrosino

Declaration

The undersigned José Ramón Sendra Sendra, as *Ingeniería Electrónica Canaria S.L.* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

A handwritten signature in blue ink is written over a company stamp. The stamp includes the Inelcan logo and the following text: "Ingeniería Electrónica Canaria S.L.", "C.I.F.: B 35792787", "Campus Universitario de Tafira - 35017", and "Las Palmas de Gran Canaria - Spain".

Ingeniería Electrónica Canaria S.L.
C.I.F.: B 35792787
Campus Universitario de Tafira - 35017
Las Palmas de Gran Canaria - Spain

Las Palmas de Gran Canaria, December 2016



To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned José Ricart Esteban, as *SAGULPA* Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.



Las Palmas de Gran Canaria, 11 January 2017

Euro Project Consult

22 rue Racine 44000 Nantes

N° SIRET: 508 511 938 00039

Tel: (+33)/(0)2.40.35.00.72

Fax: (+33)/(0)2.40.08.91.35

marie.launay@europrojectconsult.eu

Euro Project Consult



To:

Claudio Mantero, CIVITAS DESTINATIONS Project Coordinator
Giorgio Ambrosino, CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned, Ms Marie Launay, as Euro Project Consult Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Nantes, 03/01/2017

Marie Launay

Euro Project Consult
22, rue Racine
F-44000 NANTES
SIREN 508 511 938
Tel: +33 (0)2 40 35 00 72
Fax : +33 (0)2 40 08 91 35
contact@europrojectconsult.eu



To:

CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Mario Gualdi, as Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Rome, December 2016


ISTITUTO DI STUDI PER
L'INTEGRAZIONE DEI SISTEMI
Largo dei Lombardi, 4 - 00186 Roma
Tel. 06.3212655 - Fax 06.36092003
P. Iva 00934601006



No. 131/27.12.2016


To:

CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Lucia Cristea, as Managing Director of European Integrated Projects SRL, and as Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Bucharest, 27th of December, 2016



欧伟企业咨询有限公司

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned JULIA PEREZ-CEREZO FLORES, as SUSTAINABLE SERVICES S.L. (GV21) Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Madrid, 26th. December 2016

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Paul CURTIS, as Vectos Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project. All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

Signed

A handwritten signature in blue ink, appearing to read "Paul Curtis".

Place

London

Date

17 January 2017



**CPMR
CRPM**

To:
CIVITAS DESTINATIONS Project Coordinator
CIVITAS DESTINATIONS Data Protection Manager

Declaration

The undersigned Eleni Marianou, Secretary general of the Conference of Peripheral Maritime Regions of Europe, as Data Protection Responsible for the CIVITAS DESTINATIONS project, confirms to comply with all of the ethical dimensions of the project.

All data collection and processing will be carried out according to EU and national legislation and in particular according to Chapter 5.1 - "Ethics" of the signed Grant Agreement.

**CONFÉRENCE DES RÉGIONS
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Rennes, 5th January 2017

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