INTERACT
and
the General Data Protection Regulation
(GDPR)
2018

The General Data Protection Regulation

Contents

1. What is INTERACT?

INTERACT is a circumarctic network of more than 80 terrestrial field bases in all Arctic countries and adjacent high alpine and forested areas. INTERACT is building capacity for identifying, understanding, predicting and responding to diverse environmental changes throughout the wide environmental and land-use envelopes of the Arctic.

INTERACT arose from the SCANNET network which started in 2001. The network grew from a network of 9 research stations around the north Atlantic to a pan-Arctic advanced infrastructure project within the EU Horizon2020 programme. The project provides Transnational Access to 43 research stations throughout the Arctic. The physical transnational access is complemented with virtual (free access to metadata and data collected by the research stations) and remote (observations carried out by station staff) access. A Station Managers' Forum ensures best practices in e.g. safety at research stations and reducing emissions from research stations. Joint research activities develop standardized monitoring schemes for biodiversity, drone technology in the field, local adaptation schemes and procedures for action when a hazard occurs. Guidelines for storing real data are developed through our Data Forum.

2. What is GDPR?

The EU General Data Protection Regulation (GDPR) purpose is to harmonize data privacy laws across Europe, to protect and empower all EU citizens' data privacy, and to reshape the way organizations across the region approach data privacy.

The GDPR applies to 'personal data' meaning any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier. This includes, for instance: name, surname, home address, e-mail address or location data from the map on your mobile. Typically, the data you might hold on your employees, your clients and your suppliers.

The GDPR applies on all handling of personal data such as how to collect, handle, store and delete the data.

3. Aim of this document

The aim of this document is to ensure that INTERACT follows GDPR and to let users of INTERACT know how we do this. The aim is both to be a guideline to those working with the INTERACT tasks involving personal data collection and processing, and an information to those whose personal data is involved.

4. Key GDPR principles

The GDPR recommendations can be summarized into three general points:

- Collect personal data with a clearly defined purpose and don't use it for something else

- Don't collect more data than you need

- Delete data that is no longer used

Personal data shall be handled with consideration to six principles (Figure 1).

Figure 1. The six principles that provide good guidelines on how to handle personal data

5. When is GDPR relevant for INTERACT and how do we deal with it?

INTERACT processes personal data in order to fulfill the project assignment. The legal ground is that it is in the **public interest** under the EU legislation or national legislation (Ref EU).

We have identified six categories when GDPR is relevant for INTERACT. A summary can be found in Appendix I and more details follow in the sections below.

5.1 INTERACT General administration

5.1.1 What data is affected?

- Contact lists for stations (name, email address, postal address, phone number)
- Mailing lists (newsletter)

Consent is required to send newsletter to external receivers only. TA/RA applicants are external receivers, all others within INTERACT can be considered internal receivers and don't require a consent.

- Email handling (upcoming LU directive autumn 2018 according to Lund DPO)

5.1.2 INTERACT solution

Data collection

Data for internal subjects is collected directly from the subject or from subjects' manager or work colleague within the same INTERACT partner agreement

Data for external subjects is always collected directly from the subject

In the collection/registration procedure:
- Keep registered information to a minimum with a clear purpose
- Inform subject on why the data is collected (if not obvious)
- Inform subject on who will have access to/receive/handle the information
- Inform subject on how long the information will be stored
- Collect consent from external subjects (e.g. newsletter receivers)

Data process/handling
- Newsletters and other e-mails with multiple external receivers are to be sent in the "Secret copy" / bcc field.
- Newsletters should contain information about how to unsubscribe from the newsletter.

Data storing and deleting
- Personal lists, mailing lists/ overviews should be stored password protected in a GDPR compliant data storage, like Google Drive or Dropbox
- All lists should be kept up to date and deleted when no longer used

- Contact information regarding who is responsible for the collection, update and removal of personal identifiable information should be clearly communicated on the INTERACT website
- Requests to provide information about, update or remove personal identifiable information from personal lists / mailing lists should be acted upon within stated timeframe

5.2 INTERACT Internal Management Tool - Progecta (INTERACT.PROGECTA.INFO)

5.2.1 What data is affected?

- Project participants' name, email address

5.2.2 INTERACT solution

Data collection

Data is always collected directly from the subject

In the collection/registration procedure:
- Keep registered information to a minimum with a clear purpose
- Inform subject on why the data is collected (if not obvious)
- Inform subject on who will have access/receive/handle the information
- Inform subject on how long the information will be stored

Data processing/handling
- Only WP leaders, Tasks leaders (when different from WP leader) and Deliverable's responsible will have a user id.
- Other project participants only need a quick view of the project status and they will use an anonymous View-Only user id.
- Updates about project advancement (deliverable approved, milestone reached) should be sent to the Interact mailing list in the newsletter

Data storing and deleting
- Personal lists, mailing lists/ overviews should be stored password protected in a GDPR compliant data storage, like Google Drive or Dropbox
- All lists should be kept up to date and deleted when no longer used

5.3 INTERACT Web site (EU-INTERACT.ORG)

5.3.1 What data is affected?

- Photos
- Contact information
- About/People (Photo, Name, Email)
- About/Pool of expertise (Name)
- About/Bulletin board (Photo, Name)
- Field Stations (Contact details: Name, Email, Phone number; Photos)
- News (Photo, Contact details)

- Media (Film)
- Gallery (Photos)

5.3.2 INTERACT solution

Data collection

Contact information, personal data and photo for internal subjects is collected directly from the subject or from subjects' manager or work colleague within the same INTERACT partner agreement

In the collection/registration/update procedure:
- Keep registered information to a minimum with a clear purpose
- Inform subject why the data is collected (if not obvious)
- Inform subject who will have access/receive/handle the information
- Inform subject how long the information will be stored

Photo/film
- When taking photos / film including pictures where people can be identified the subject should be informed about the intended use / publication of the photo / film and have the option not to be in the picture. This can be done in the invitation, information about the event or similar type of communication.
- For pictures with identifiable people there are 3 categories defined with different levels of need for consent (Ref Lund University); News-, Mingle- and Genre pictures:
    - News pictures (No consent needed); All people included are relevant, known and informed about the handling of the pictures. E.g. interviewees, spokesperson, speaker on a conference, researcher conducting field work.
    - Mingle pictures (No consent needed): Information provided to get an insight in the business. E.g. pictures from a conference, coffee break during a public presentation, pictures of a crowd from graduation.
    - Genre pictures (Consent required): All pictures where the people can be replaced. E.g. students, scientists, teacher giving a class if the picture is used to provide a general description.
- For pictures to be identifiable means that a person can be recognized and identified. E.g. a guard standing half hidden behind the prime minister can be recognized and identified. A person pictured from behind is not identifiable even if a haircut or clothing means that he/she is identifiable by many.
- Photos / films including identifiable persons is the responsibility of the photographer to secure consent from and/or inform the subject. INTERACT is responsible to inform the photographer about their responsibility

Data process/handling
Contact Us page
- Listed Contact person should always be a person whose work assignment includes being a contact person. This means no written consent is needed to publish relevant contact information on the web. (The contact person should be informed before being listed.)

Data storing and deleting
- Information on how to contact the responsible for what is published on the web and request information about, update to and removal (if valid) of personal identifiable information should be clearly communicated on the website
- Requests to provide information about, update or remove (if valid) personal identifiable information on the website should be acted upon within stated timeframe

5.4 INTERACT Social media channels

5.4.1 What data is affected?
- Photo
- Name

5.4.2 INTERACT solution

Data collection

Contact- and Personal Data are always collected directly from the subject

- When taking photos / film including pictures where people can be identified then subject should be informed about the intended use / publication of the photo / film and have the option not to be in the picture. This can be done in the invitation, information about or similar type of communication.
- For pictures with identifiable people there are 3 categories defined with different level of need for consent (Ref Lund University); News-, Mingle- and Genre pictures:
    - News pictures (No consent needed); All people included are relevant, known and informed about the handling of the pictures. E.g. interviewees, spokesperson, speaker on a conference, researcher conducting field work.
    - Mingle pictures (No consent needed): Information provided to get an insight in the business. E.g. pictures from a conference, coffee break during a public presentation, pictures of a crowd from graduation.
    - Genre pictures (Consent required): All pictures where the people can be replaced. E.g. students, scientists, teacher giving a class if the picture is used to provide a general description.

Data process/handling
- For pictures to be identifiable means that a person can be recognized and identified. E.g. a guard standing half hidden behind the prime minister can be recognized and identified. A person pictured from behind is not identifiable even if a haircut or clothing means that he/she is identifiable by many.
- Photos / films including identifiable persons is the responsibility of the photographer to secure consent from and/or information to the subject. INTERACT is responsible to inform the photographer about their responsibility.

Data storing and deleting
- Contact information regarding who is responsible for the content published on each channel, and also the collection, update and removal of personal identifiable information should be clearly communicated on each channel respectively
- Requests to provide information about, update or remove personal identifiable information on the website should be acted upon within stated timeframe

5.5 INTERACT Meetings

5.5.1 What data is affected?

- contact details

- dietary preferences

- copy of passport for invitation letters/visa process

- photos taken at the meeting; speakers, group/mingle pictures

5.5.2 INTERACT solution

Data collection

Contact- and Personal Data are always collected directly from the subject

In the invitation letter/registration procedure:
- Keep registered information to a minimum with a clear purpose
- Inform subject why the data is collected (if not obvious)
- Inform subject who will have access/receive/handle the information
- Inform subject how long the information will be stored
- Inform about intended photo and filming on the meeting and the intended used of the photos/films

Data process/handling
- Create participants lists only with minimum Participant details; Name, Organization, Email address
- Send out / share participant lists limited to those informed about when collecting the information
- Create and print name tags and participation lists with minimum Participant information. Store printed material in a secure way
- Publish and share photos/films only within the defined scope during data collection

Data storing and deleting
- Registration form / overview should be password protected
- Photos / films, personal lists, mailing lists/overviews should be stored password protected in a GDPR compliant data storage, like Google Drive or Dropbox
- Don't store any copy of passports, Forward the incoming mail, Delete the incoming email. Keep the sent email temporarily for admin backup. Delete sent email within stated timeframe after the Meeting was completed.

- Delete sensitive data e.g. dietary preferences and passport copy within 2 months after the meeting
- Delete all files with Meeting registration data when Project is closed

5.6 INTERACT TA/RA Application and Evaluation System (EU-INTERACCESS.ORG)

5.6.1 What data is relevant?

- Applicants details

5.6.2 INTERACT solution

Data collection
- Contact- and Personal Data are always collected directly from the subject
- Keep registered information to a minimum with a clear purpose
- Inform subject why the data is collected (if not obvious)
- Inform subject who will have access/receive/handle the information
- Inform subject how long the information will be stored
- Collect consent to privacy policy, receive newsletters etc

Data process/handling
- Applicant details are accessed/received/handled by only those mentioned when collecting the data

Data storing and deleting
- Password protected in the cloud
- All applicants' data will be deleted within stated timeframe after the end of the project

5.7 Other External Databases within the EU

Other external databases within the EU that are used by the INTERACT project, e.g. INTERACT GIS, will follow their own guidelines regarding the GDPR.

6. Contacts

6.1 CONTACT FOR INTERACT

Project Coordinator: Margareta Johansson (margareta.johansson@nateko.lu.se)

6.2 CONTACT FOR LUND UNIVERSITY

DPO: *dataskyddsombud@lu.se or phone: 046-222 00 00*

6.3 SUPERVISING AUTHORITY

www.datainspektionen.se

7. List of Reference

7.1 INTERACT

https://eu-interact.org/

7.2 GDPR

7.2.1 EU

https://ec.europa.eu/commission/priorities/justice-and-fundamental-rights/data-protection/2018-reform-eu-data-protection-rules_en

7.2.2 Lund University

General GDPR information to all
https://www.lu.se/start/behandling-av-personuppgifter-vid-lunds-universitet (Swedish)
https://www.lunduniversity.lu.se/about/contact-us/gdpr-information (English)

Personal data processing
https://www.lunduniversity.lu.se/about/contact-us/processing-of-personal-data-at-lund-university

Newsletters and consent
https://personuppgifter.blogg.lu.se/nyhetsbrev-och-samtycke/

Photo & Film
    Handling of photo and film
    https://personuppgifter.blogg.lu.se/foto-och-film-publicering-pa-webb-och-i-trycksaker/
    Consent template for photo and film
    https://www.medarbetarwebben.lu.se/article/gdpr-och-samtycke-fran-personer-pa-bild-och-i-film

Appendix I: Overview of INTERACT Personal data handling

Information	5.1 INTERACT Administration	5.2 INTERACT internal management tool	5.3 INTERACT website	5.4 INTERACT Social Media Channels	5.5 INTERACT Meetings	5.6 INTERACT TA/RA Application and Evaluation System
Commitment	Lund University (H2020-INTERACT)	Lund University (H2020-INTERACT)	Lund University (H2020-INTERACT)	Lund University (H2020-INTERACT)	Lund University (H2020-INTERACT)	Lund University (H2020-INTERACT)
The purpose of data processing	General Administration, Mailing facilitation(newsletters), Overview, Transfer of money to partner institutions	Project Management (Internal tool)	Project Outreach	Project Outreach	To coordinate and facilitate larger meetings including country entry procedures, arrival, departure and accommodation coordination, dietary preferences/allergies	TA/VA Call Management tool
The types of personal data	Partner Contact details, Network Contact details Photo	Project Participants: Name, Email address	User id/Email address Photo	Photo Name	Name Email dress Organization Invoice address Passport copy (photo) Flight arrival and departure date/time Dietary restrictions	Applicant's details
The categories of data subjects concerned	Project participants, Station Managers, Board	Users (WP/Tasks/Deliverable resp.)	Project participants, Station Managers, Board	TA/RA users Partners	Meeting Participants	Applicants, group members, TA board
The categories of recipients		Project coordinator; EU Commission	Public	Public	Meeting coordinator, Local Organizer, Participants	TA board, EU Commission

The storage periods	Project period (Oct 2016/Sep 2020)	Project period (Oct 2016/Sep 2020)	Project period (Oct 2016/Sep 2020)	Project period (Oct 2016/Sep 2020)	Meeting registration - One month after Meeting Passport not stored, forwarded to local org. In sent email – deleted One month after meeting	Project period (Oct 2016/Sep 2020)
The technical and organizational security measures to protect the personal data	Password protected. Regularly Updated	Password protected. SSLL protocol.	Password protected. Regularly Updated	Public	Password protected	Password protected. Regularly Updated
Whether personal data is transferred to recipients outside the EU		No	Storage in the cloud	Yes	Participants lists to Participants	Storage in the cloud