

Fostering the Innovation Potential of Research Infrastructures
INFRAINNOV-2-2016: Support to Technological Infrastructures



CLONETS – CLock NETwork Services
Strategy and innovation for clock services
over optical-fibre networks

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Ethics Framework
Final

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1 Executive Summary

This deliverable, D3.2 “Ethics Framework”, defines the approach to ethics issues applied in the CLONETS project. It responds to the Requirements of the Ethics Summary Report [2] on the CLONETS proposal.

Ethics issues in CLONETS arise in the categories of research involving human participants and personal data protection.

Research involving human participants is limited to surveys of technically qualified individuals in their professional capacity, in order to obtain information of a technical nature concerning needs and applications for time and frequency services over optical-fibre networks. This information does not in itself raise any ethics issues. The ethics obligations arising from these activities are limited to information and informed consent of the participants, and protection of their (professional) contact information which is processed for the organisation of the surveys.

Personal data is also processed in other activities of the project, requiring appropriate personal data protection measures. For individuals who are external to the project this is limited to (professional) contact information which is used for activities such as dissemination, stakeholder engagement, training, etc. For project participants, data is also collected about the functioning of the project, including the activities of individuals, for purposes such as management and reporting, which places additional requirements on this data. No sensitive personal data is processed in this project, and personal data processing is quite limited in general.

This document defines the measures implemented in this project to ensure compliance with the obligations of information and informed consent of human participants, and of personal data protection. It also provides templates of the corresponding information sheets and informed consent forms.

2 Introduction

2.1 Document content

This document defines the ethics framework for the CLONETS project [1]. The ethics review of the CLONETS proposal identified ethical issues concerning research with human participants and protection of personal data, as stated in the Ethics Summary Report [2]. The project was granted conditional ethics clearance subject to compliance with Pre- and Post-Grant Agreement Requirements. This document completes the response to these Requirements.

The Ethics Framework takes account of the issues identified in the Ethics Summary Report [2] for the survey activities under Work Package 3 (WP3) “Identification of additional applications and markets”. It also covers analogous issues in WP1 “Definition of key technologies and trends”, WP4 “Impact, training and communication” and WP5 “Management”, to ensure a uniform approach across the project.

This document is structured as follows:

Chapter 3 provides an overview of relevant and applicable ethical and data protection regulation.

Chapter 4 describes the ethics and data protection issues in the CLONETS project identified in the Ethics Summary Report complemented by self-screening.

Chapter 5 presents in detail the Ethics Framework, composed of two main parts, the Personal data protection policy and the Information and informed consent policy.

Chapter 6 gives the conclusions.

Annex 1 reproduces the Ethics Summary Report for convenience.

Annexes 2 to 5 provide the templates for the information and informed consent forms.

2.2 References and Applicable Documents

[1] <http://www.clonets.eu/>

[2] “Ethics Summary Report”, Call reference H2020-INFRAINNOV-2016-1, Proposal number 731107, Acronym CLONETS, Ref. Ares(2016)4678210 - 22/08/2016. (Reproduced in Annex 1 of the present document.)

[3] Regulation (EU) No 1291/2013 of the European Parliament and of the Council of 11 December 2013 establishing Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020) and repealing Decision No 1982/2006/EC Text with EEA relevance; OJ L 347, 20.12.2013, p. 104–173.

[4] Regulation (EU) No 1290/2013 of the European Parliament and of the Council of 11 December 2013 laying down the rules for participation and dissemination in "Horizon 2020 - the Framework Programme for Research and Innovation (2014-2020)" and repealing Regulation (EC) No 1906/2006 Text with EEA relevance; OJ L 347, 20.12.2013, p. 81–103.

[5] European Union, Charter of Fundamental Rights of the European Union, 26 October 2012, 2012/C 326/02.

[6] The European Convention on Human Rights,
<http://www.echr.coe.int/Pages/home.aspx?p=basictexts>.

[7] Grant Agreement number 731107 between the European Commission and the CLONETS Consortium, 2016.

- [8] European Code of Conduct for Research Integrity of ALLEA (All European Academies) and ESF (European Science Foundation) of March 2011, <http://archives.esf.org/coordinating-research/mo-fora/research-integrity.html>. See also <http://www.allea.org/allea-publishes-revised-edition-european-code-conduct-research-integrity/>.
- [9] H2020 Programme, Guidance, How to complete your ethics self-assessment, V5.2, 12 July 2016, http://ec.europa.eu/research/participants/data/ref/h2020/grants_manual/hi/ethics/h2020_hi_ethics-self-assess_en.pdf.
- [10] Directive 95/46/EC of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, Official Journal L 281, 23/11/1995 p. 31-50.
- [11] Directive 2002/58/EC of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), Official Journal. L 201, 31/7/2002 p. 37-47.
- [12] Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services, Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector and Regulation (EC) No 2006/2004 on cooperation between national authorities responsible for the enforcement of consumer protection laws.
- [13] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data, Official Journal L 008, 12/01/2001 P. 0001 - 0022
- [14] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation), OJ L 119, 4.5.2016, p. 1–88.
- [15] “Data protection principles”, UK Information Commissioner’s Office, <https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>.
- [16] <https://www.surveymonkey.co.uk/>
- [17] <https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>

2.3 List of Acronyms and Abbreviations

CA	Consortium Agreement
CLONETS	CLock NETwork Services: Strategy and innovation for clock services over optical-fibre networks Project
CSA	Coordination and Support Action
EC	European Commission
EU	European Union
GA	Grant Agreement
H2020	Horizon 2020
NREN	National Research and Education Network
TF	Time and Frequency
WP	Work Package

2.4 List of CLONETS Project Participants and Abbreviations

AGH/AGH-UST	Akademia Górniczo-Hutnicza im. Stanisława Staszica w Krakowie, Cracow, Poland
CESNET	CESNET, zájmové sdružení právnických osob, Prague, Czech Republic
CNRS*	Centre National de la Recherche Scientifique, Paris, France
INRIM	Istituto Nazionale di Ricerca Metrologica, Turin, Italy
GARR#	Gruppo per l'Armonizzazione delle Reti della Ricerca, Rome, Italy
Menlo	Menlo Systems GmbH, Martinsried, Germany
Muquans	Muquans, Talence, France
NPL	National Physical Laboratory, Teddington, United Kingdom
ObsParis¶	Observatoire de Paris, Paris, France
OPTOKON	OPTOKON a.s., Jihlava, Czech Republic
Piktime Systems	Piktime Systems sp z o.o., Poznan, Poland
PSNC	Instytut Chemii Bioorganicznej Polskiej Akademii Nauk – Poznańskie Centrum Superkomputerowo-Sieciowe, Poznan, Poland
PTB	Physikalsch-Technische Bundesanstalt, Braunschweig, Germany
RENATER	Groupement d'intérêt Public pour le Réseau National de Telecommunications pour la Technologie, l'Enseignement et la Recherche, Paris, France
Seven Solutions	Seven Solutions S.L., Granada, Spain
TOP-IX#	Consorzio TORino Piemonte Internet eXchange, Turin, Italy
UCL	University College London, London, United Kingdom
UP13	Université Paris 13, Villetaneuse, France
UPT AV CR (ISI)	Ustav Pstrojove Techniky AV, v.v.i., Brno, Czech Republic

* linked third party to ObsParis

third parties to INRIM

¶ coordinator

3 Ethical Principles and Data Protection Legal Background

Ethical principles and data protection are given the highest priority in the European Union (EU) H2020 programme and it is mandatory to any granted project to guarantee compliance with relevant and applicable regulation. This section provides an overview of relevant ethical principles and data protection legislation applicable to CLONETS project activities.

3.1 Horizon 2020 Programme Ethical Principles

The EU Regulations establishing the H2020 Programme (Article 19: Ethical principles) [3] and defining the rules for participation in H2020 (Article 14: Ethics Reviews) [4] define the Ethical Principles for H2020. Reference [3] states:

“All the research and innovation activities carried out under Horizon 2020 shall comply with ethical principles and relevant national, Union and international legislation, including the Charter of Fundamental Rights of the European Union [5] and the European Convention on Human Rights and its Supplementary Protocols [6].

Particular attention shall be paid to the principle of proportionality, the right to privacy, the right to the protection of personal data ...”

These obligations are imposed on the CLONETS project participants via the Grant Agreement (GA) [7], Article 34 – Ethics and Research Integrity. In addition to recalling the above, this article states (among other requirements):

“The beneficiaries must respect the highest standards of research integrity — as set out, for instance, in the European Code of Conduct for Research Integrity [8].

This implies notably compliance with the following essential principles:

- honesty;
- reliability;
- objectivity;
- impartiality;
- open communication;
- duty of care;
- fairness and
- responsibility for future science generations.

This means that beneficiaries must ensure that persons carrying out research tasks:

- present their research goals and intentions in an honest and transparent manner;
- design their research carefully and conduct it in a reliable fashion, taking its impact on society into account;
- use techniques and methodologies (including for data collection and management) that are appropriate for the field(s) concerned;
- exercise due care for the subjects of research — be they human beings, animals, the environment or cultural objects;
- ensure objectivity, accuracy and impartiality when disseminating the results;
- allow — as much as possible and taking into account the legitimate interest of the beneficiaries — access to research data, in order to enable research to be reproduced;
- make the necessary references to their work and that of other researchers;
- refrain from practicing any form of plagiarism, data falsification or fabrication;

- avoid double funding, conflicts of interest and misrepresentation of credentials or other research misconduct.”

The CLONETS proposal was subjected to an ethics review by the EC, whose conclusions are given in the Ethics Summary Report [2]. The issues raised in this report are discussed in detail in Chapter 4 of the present document.

Note also that the Horizon 2020 documentation includes a guide to self-assessment of ethics issues, reference [9].

3.2 European Union and National Data Protection Regulations

Of particular relevance for CLONETS is the legislation on Data Protection. Data protection across the EU is underpinned by a number of EU Directives, implemented through national legislation. The collection, use and disclosure of personal data (regardless of the method used) at the European level is regulated in particular by the following directives:

- Directive 95/46/EC on protection of personal data (Data Protection Directive) [10]
- Directive 2002/58/EC on privacy and electronic communications (e-Privacy Directive) [11]
- Directive 2009/136/EC (Cookie Directive) [12]
- Regulation (EC) No 45/2001 [13]

The Data Protection Directive [10] was issued in 1995, and all Member-States have enacted their own data protection legislation accordingly. This document contains the main guidelines and principles for protection processing and movement of personal data. The Data Protection Directive defines personal data as:

“any information relating to an identified or identifiable natural person (‘data subject’); an identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identification number or to one of more factors specific to his physical, physiological, mental, economic, cultural or social identity”.

The same Directive also defines personal data processing as:

“any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.”

More recently, the General Data Protection Regulation (EU) 2016/679 [14], adopted in April 2016, will supersede the Data Protection Directive and be enforceable starting on 25 May 2018.

The CLONETS project participants are legal entities of 7 different EU Member States and are regulated by their specific national implementations of this legislation. An example is given by the UK Data Protection Act, based on 8 data protection principles, which are summarised by the UK Information Commissioner’s Office [15] as:

“Schedule 1 to the Data Protection Act lists the data protection principles in the following terms:

- Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –
 - at least one of the conditions in Schedule 2 is met, and

- in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
- Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.
- Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
- Personal data shall be accurate and, where necessary, kept up to date.
- Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- Personal data shall be processed in accordance with the rights of data subjects under this Act.
- Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
- Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.”

Detailed explanations of these principles are available on the web site indicated in reference [15].

4 Description of ethics issues in CLONETS

As described in the Ethics Summary Report [2], ethics issues were raised during the review of the CLONETS proposal by the European Commission (EC), in particular in Task 3.2 of WP3 involving the collection of data via surveys and telephone interviews. The issues raised were research involving human participants and personal data protection. Further, the project participants conducted a complementary screening, based on reference [9], to identify related issues in other tasks. The complete list of identified potential ethics issues is given in Table 1.

WP	Task or activity	Potential Ethics Issues
WP1	1.1 High precision Time and Frequency (TF) needs of Research Infrastructures (RI) <ul style="list-style-type: none"> • survey of RI TF needs 1.2 Technological status and capabilities of Research & Education Networks (NREN) <ul style="list-style-type: none"> • survey of current NREN networking technologies 	Human research participants Personal data protection
WP3	3.2 Survey of TF needs of public, research, government and commercial subjects	Human research participants Personal data protection
WP4	4.1 Dissemination: <ul style="list-style-type: none"> • website: account information and logs, publication of limited project participant information • newsletter: list of contacts 	Personal data protection
	4.2 Stakeholder continuous engagement: <ul style="list-style-type: none"> • stakeholder committee contact information • policymaker contact information • dissemination events contact information 	Personal data protection
	4.3 Training: <ul style="list-style-type: none"> • Pilot Master: student data • Short training meetings: participants' information 	Personal data protection
WP5	5.1 Coordination and monitoring: <ul style="list-style-type: none"> • Project participant lists: contact information, role in project, etc. • Mailing lists: subscribers' names and email addresses • Project Body membership lists 5.2 Meetings: <ul style="list-style-type: none"> • Participant lists, minutes, etc. 5.3 Reporting: <ul style="list-style-type: none"> • Document author lists, recognition of work, etc 	Personal data protection

Table 1. CLONETS project tasks with potential ethics issues identified by the ethics review and the consortium.

It is important to note a number of points which help to appreciate the low level of ethics issues of this project:

- **no sensitive personal data will be processed;**
- in all cases where human participation is identified (WP1 and WP3), this concerns surveys of technically qualified individuals in their professional capacity, not as private users of time and frequency services. The information which is the objective of the surveys does not raise ethics issues in itself. The ethics considerations of these activities are thus limited to information and informed consent of the subjects, and personal data protection concerning (professional) contact information of the subjects which will be processed for the purpose of organising the surveys;
- in Task 4.3, any personal data needed for student enrolments in the Pilot Master will be collected under the responsibility of the establishment in charge of this diploma, Politecnico di Torino, and will **not** be available to the CLONETS project.

5 Ethics Framework

This chapter defines the ethics framework which is applied to ensure that the CLONETS projects complies with EU and national ethics requirements, in view of the potential ethics issues identified in chapter 4. This framework consists of two main parts, concerning personal data protection, described in section 5.3, and information and informed consent, defined in section 5.4.

5.1 Applicability

This framework must be applied by all CLONETS project participants for all activities carried out in the context of the GA 731107 [7]. The project participants, as identified in the GA, are 19 distinct legal entities, of which 16 are Beneficiaries and 3 are Third Parties. The complete list is given in section 2.4. As the Third Parties are not signatories of the GA or the Consortium Agreement, the obligation to respect this framework must be transferred to them through their contractual arrangement with the corresponding Beneficiary.

In the following, “participant” is used indifferently to refer to the 19 legal entities, and to their personnel who work on the project.

5.2 Research involving human participants

CLONETS is a Coordination and Support Action. As explained in chapter 4, its activities which may be considered to have a component of research involving humans consist in surveys to identify the needs and possible applications for time and frequency (TF) services provided over optical-fibre networks, and to assess the networking technologies currently deployed by NRENs.

These surveys will address technically qualified individuals in their professional capacity. They will be selected for their professional relevance to the subject of CLONETS, based on:

- professional knowledge and contacts of CLONETS project participants,
- publicly available professional information,
- information provided voluntarily by the individuals in response to presentations at professional events such as conferences.

Participation in the surveys will be on a purely voluntary basis.

The data which is the objective of the surveys concerns the professional activities of the respondents and does not raise ethical issues in itself.

Based on reference [9], the ethics issues arising from these surveys are therefore limited to information and informed consent of the subjects, and personal data protection concerning (professional) contact information of the subjects which will be processed for the purpose of organising the surveys. The policy concerning these two aspects is defined in the following two sections.

5.3 Personal data protection policy

For convenience, the personal data protection policy is divided into two parts:

- **external:** concerning the personal data of individuals who do not have any role in organising and running the CLONETS project,

- **internal:** concerning the personal data of individuals who have a role in organising and running the project, i.e. personnel of the beneficiaries and third parties to the GA, Advisory Board members, etc.

These two parts are described in the following sections.

5.3.1 External personal data

This part of the policy concerns individuals who are external to the project in the sense that they do not have any responsibility or role in its organisation, running and reporting. Their personal data is referred to as *external personal data*.

Legal compliance

Project participants who process personal data will do so in compliance with EU and national legislation. They will make any necessary declarations, obtain any necessary authorisations and apply security precautions following the usual procedures of their legal entities.

Description of the personal data to be processed

CLONETS will collect a limited amount of personal data about individuals whose professional activity is relevant to CLONETS. This data will be:

- Name
- Employer
- Position
- Telephone number
- Email address

CLONETS will also collect data in the form of replies to surveys about the needs and possible applications for TF services provided over optical-fibre networks. These surveys will concern only the professional activities of the individuals and their employer or institute. Nevertheless, this constitutes personal data if and while it contains information allowing the individual respondents to be identified.

Purposes of personal data processing

Personal data will be processed for the following purposes:

- Organising surveys, dissemination and training activities,
- Identifying needs and applications for time and frequency services delivered over optical fibre.

All personal data will be used only for non-commercial purposes.

Data collection and storage methods and safeguards

Contact information of relevant individuals will be collected from:

- previous knowledge of CLONETS project participants,
- publicly available professional contact information,
- or provided by the individuals themselves in response to invitations at professional events such as conferences.

Surveys will be carried out using suitable online tools, such as LimeSurvey, hosted internally by a project participant, or the external service provider SurveyMonkey [16], under a service agreement with a project participant. Online surveys may be followed up by telephone, by a project participant.

Personal data will be processed and stored, strictly as needed for the purposes of the project, with the application of standard security procedures of the participant responsible for the processing.

The following communication and data sharing tools will be used collectively by the project participants:

- a mailing list server provided by ObsParis. Subscriptions are managed through individual, password-protected accounts.
- a file-sharing (cloud) service provided by ObsParis. Access is through individual, password-protected accounts. It is suitable for personal data storage.
- the project website [1], provided by PTB. This includes a restricted area, accessible via individual, password-protected accounts, where personal data may also be stored.

Data retention and destruction

At the end of the CLONETS project, subject to the permission of the individual,

- contact information will be retained by the project participants, for the purposes of communication with interested persons in the context of subsequent, closely-related work,
- responses to surveys will be anonymised such that they no longer constitute personal data, and will be retained by the project members to allow complementary analyses in subsequent, closely-related projects.

Otherwise personal data will be destroyed.

Data divulcation or communication to third parties

Survey data collected through SurveyMonkey will be subject to the SurveyMonkey privacy policy [17]. Otherwise, personal data will be available only to the project participants, it will not be communicated to any other parties. Publications, communications and other products of CLONETS will include only anonymised or aggregated data, so that individuals cannot reasonably be identified.

Data transfer to non-EU countries

Survey data collected through SurveyMonkey will be processed in non-EU countries in compliance with the EU-US Privacy Shield Framework, as specified in the SurveyMonkey privacy policy, [17]. Otherwise, no personal data will be transferred to non-EU countries.

Exercise of data subject rights

CLONETS will provide the necessary support for data subjects (individuals whose private data is processed) to exercise their rights of access, correction, opposition and suppression.

For all requests related to personal data processing by CLONETS, individuals can contact the Project Coordinator, ObsParis, via the email address contact@clonets.eu, or at the postal address: Paris Observatory, 61 avenue de l'Observatoire, 75014 Paris, France.

The other project participants will each designate a point of contact for personal data protection, who will support the coordinator in treating such questions.

5.3.2 Internal personal data

This part of the policy applies to personal data of individuals having a role in the organisation, running and reporting of the project, such as personnel of the beneficiaries and third parties to the GA, Advisory Board members, etc. This is referred to as *internal personal data*. It is used

more extensively than external personal data, notably because of the GA obligations on reporting to the EC.

The data protection policy applied to internal personal data includes all of the above provisions for external personal data, with the following modifications:

- In addition, CLONETS will collect and process data for purposes related to the organisation, running, record-keeping and reporting of the project, such as: project members list, email lists, minutes of meetings, published documents including deliverables, etc. This constitutes personal data if and while it contains information allowing individuals to be identified.
- Internal personal data may be transferred to the EC or made public, for example via the project web site [1] or in documents produced and published or otherwise distributed in the course of the project, to the extent necessary for fulfilling the GA.
- Internal personal data will be retained for the duration necessary for the purposes of fulfilling the GA, including any procedures or reviews after its closing date. After this time, it will be destroyed unless the individual has given permission for its further use, in which case it will be retained for use in related, subsequent work.

5.4 Information and informed consent policy

Respondents to surveys and other data subjects will be given complete information about the processing of their personal data. Their participation will be on a voluntary basis and their informed consent will be obtained.

Annexes 2 to 5 contain the templates for the Information Sheets and Informed Consent Forms. There are two of each, corresponding to the cases of external and internal data described above.

The presentation of the consent forms may be adapted to the medium of communication: paper, web, etc. Given the innocuous nature of the personal data to be processed, consent may be obtained through online forms. In the case of dissemination of information via a mailing list, instructions on the procedure for opting out of the list will be provided.

6 Conclusions

This document defines the ethics framework for the CLONETS project, and completes the response to the Requirements stated in the Ethics Summary Report [2]. As explained in chapter 4, the ethics issues in CLONETS are rather limited, concerning the information and consent of participants in surveys of a purely professional nature, and personal data protection concerning non-sensitive data, essentially professional contact information. The ethics framework is defined in chapter 5 and consists of two main parts, the Personal data protection policy, section 5.3, and the Information and informed consent policy, section 5.4. Annex 2 to Annex 5 provide the templates for the information and informed consent forms.

Annex 1. Ethics Summary Report on the CLONETS proposal

 Ref. Ares(2016)4678210 - 22/08/2016

Ethics Summary Report

Call Reference	H2020-INFRAINNOV-2016-1
Proposal Number	731107
Acronym	CLONETS

Ethics Issues

Humans

Does this research involve human participants?	Yes
Are they volunteers for social or human sciences research?	Yes
Comments Human volunteers will participate in a market study (survey, telephone interviews).	

Protection of personal data

Does this research involve personal data collection and/or processing?	Yes
Comments The established contacts (mainly personal) of Consortium members to community users will be used for survey purposes.	

Identified Ethics Issues

The collection of data via surveys and telephone interviews (task 3.2) has not been flagged by the applicant. The data will be collected from the representative of the public, research, government and commercial subjects on their needs (p. 30). Data protection issues should be dealt adequately.

Ethics Opinion

Conditional ethics clearance (i.e. clearance is subject to conditions, i.e. ethics requirements. The requirements must either be fulfilled before grant signature or become part of the grant agreement)

Pre-Grant Requirements

Protection of personal data

1. It needs to be clarified what sort of data will be collected.
2. Detailed information must be provided on the procedures that will be implemented for data collection, storage, protection, retention and destruction and confirmation that they comply with national and EU legislation.

Post-Grant Requirements

Humans

1. Details on the procedures and criteria that will be used to identify/recruit research participants must be provided.
2. Detailed information must be provided on the informed consent procedures that will be implemented for the participation of humans.
3. Templates of the informed consent forms and information sheet must be submitted on request.

Annex 2. External Information Sheet Template

CLONETS – CLock NETwork Services

External Personal Data Protection Information Sheet

Scope

This information sheet is intended for individuals who are external to the CLONETS project, i.e. who do not have any responsibility or role in its organisation, running and reporting. It provides information about how and in what conditions your personal data may be processed in the course of this project.

About CLONETS

CLONETS is a project funded by the European Union (EU) under the Horizon 2020 Programme, Grant Agreement no. 731107, from 1 January 2017 to 30 June 2019, see <http://www.clonets.eu>. It is carried out by 19 beneficiaries and third parties, see <http://www.clonets.eu/clonets-consortium.html>, referred to here as the *participants*, coordinated by Paris Observatory. Its aims are to identify needs and applications for a pan-European optical fibre network delivering time and frequency references, to develop strategies and roadmaps for the implementation of such a network and to carry out related training and dissemination activities.

Legal compliance

The CLONETS participants will process personal data in compliance with EU and national private data protection legislation, respecting your rights of access, correction, opposition and suppression concerning your personal data held by CLONETS. Requests should be addressed to the CLONETS coordinator Observatoire de Paris at contact@clonets.eu, or at the postal address: 61 avenue de l'Observatoire, 75014 Paris, France.

Description of the personal data which is collected

The following personal data is collected within CLONETS:

- Your professional contact information. This may be obtained from CLONETS participants' prior knowledge, from publicly-available sources or provided by yourself.
- Replies to surveys concerning professional needs for time and frequency services over fibre. This is considered personal data only if and while it includes information allowing individual respondents to be identified.

Purposes of personal data processing

Personal data is used in CLONETS for the following purposes:

- Organising surveys, dissemination and training activities.
- Identifying needs and applications for time and frequency services delivered over optical fibre.

All personal data is used only for non-commercial purposes.

Personal data privacy and disclosure

CLONETS uses SurveyMonkey to collect some survey data. If you respond to such a survey, the data you provide will be available to SurveyMonkey, under the terms of their privacy policy, <https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>. Otherwise, your personal data is available only to the CLONETS project participants, it will not be communicated to any other parties. Publications, communications and other products of CLONETS will include only anonymised or aggregated data, so that individuals cannot reasonably be identified.

Data transfer to non-EU countries

CLONETS collects some survey data using SurveyMonkey, which processes data in non-EU countries in compliance with the EU-US Privacy Shield Framework, see <https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>. Otherwise, no data is transferred to non-EU countries.

Lifetime and retention of personal data

Your personal data will be retained for the duration of the project. At the end of the project, if you give your permission:

- your contact information will be retained by the project participants, for the purposes of communication with interested persons in the context of subsequent, closely-related projects;
- your responses to surveys will be anonymised such that they no longer constitute personal data, and will be retained by the project members to allow complementary analyses in subsequent, closely-related projects;

otherwise this data will be destroyed.

Annex 3. Internal Information Sheet Template

CLONETS – CLock NETwork Services

Internal Personal Data Protection Information Sheet

Scope

This information sheet is intended for individuals having a role in the organisation, running and reporting of the CLONETS project, such as personnel of the beneficiaries and third parties to the Grant Agreement, Advisory Board members, etc. It provides information about how your personal data is processed in the course of this project.

About CLONETS

CLONETS is a project funded by the European Union (EU) under the Horizon 2020 Programme, Grant Agreement no. 731107, from 1 January 2017 to 30 June 2019, see <http://www.clonets.eu>. It is carried out by 19 beneficiaries and third parties, see <http://www.clonets.eu/clonets-consortium.html>, referred to here as the *participants*, coordinated by Paris Observatory. Its aims are to identify needs and applications for a pan-European optical fibre network delivering time and frequency references, to develop strategies and roadmaps for the implementation of such a network and to carry out related training and dissemination activities.

Legal compliance

The CLONETS participants will process personal data in compliance with EU and national private data protection legislation, respecting your rights of access, correction, opposition and suppression concerning your personal data held by CLONETS. Requests should be addressed to the CLONETS coordinator Observatoire de Paris at contact@clonets.eu, or at the postal address: 61 avenue de l'Observatoire, 75014 Paris, France.

Description of the personal data which is collected

The following personal data is collected within CLONETS:

- Your professional contact information. This may be obtained from CLONETS participants' prior knowledge, from publicly-available sources or provided by yourself.
- Replies to surveys concerning professional needs for time and frequency services over fibre. This is considered personal data only if and while it includes information allowing individual respondents to be identified.
- Information about your contribution to the project such as: participation in meetings, work carried out, authorship of documents, etc.

Purposes of personal data processing

Personal data is used in CLONETS for the following purposes:

- Organising surveys, dissemination and training activities.
- Identifying needs and applications for time and frequency services delivered over optical fibre.
- Organisation, running, record-keeping and reporting of the project.

All personal data is used only for non-commercial purposes.

Personal data privacy and disclosure

Your personal data may be communicated to the European Commission or made public, for example via the project web site <http://www.clonets.eu> or in documents produced and published or otherwise distributed in the course of the project, to the extent necessary for fulfilling the Grant Agreement.

CLONETS uses SurveyMonkey to collect some survey data. If you respond to such a survey, the data you provide will be available to SurveyMonkey, under the terms of their privacy policy, <https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>.

Otherwise, your personal data is available only to the CLONETS project participants, it will not be communicated to any other parties. Publications, communications and other products of CLONETS will include only anonymised or aggregated data, so that individuals cannot reasonably be identified.

Data transfer to non-EU countries

CLONETS collects some survey data using SurveyMonkey, which processes data in non-EU countries in compliance with the EU-US Privacy Shield Framework, see <https://www.surveymonkey.co.uk/mp/policy/privacy-policy/>. Otherwise, no data is transferred to non-EU countries.

Lifetime and retention of personal data

Your personal data will be retained for the duration necessary for the purpose of fulfilling the Grant Agreement, including any procedures or reviews after its final date. After this time, if you give your permission it will be retained for use in related, subsequent work, otherwise it will be destroyed.

Annex 4. External Informed Consent Form Template

The presentation of the consent form may be adapted to the medium of communication: paper, web, etc. Given the nature of the personal data to be processed, consent may be obtained through online forms. The template is as follows:

CLONETS – CLock NETwork Services

External Informed Consent Form

This consent form is intended for individuals who are external to the CLONETS project, i.e. who do not have any responsibility or role in its organisation, running and reporting. Before completing it, please read the CLONETS External Personal Data Protection Information Sheet, which is available here: <http://www.clonets.eu/path-to-external-information-sheet>.

Name:

Employer:

Position:

Telephone:

Email:

I confirm that I have read and understood the CLONETS External Personal Data Protection Information Sheet (referred to below as the External Information Sheet).

I authorise the CLONETS project participants to process my personal data as described in the External Information Sheet, during the period of European Union Grant Agreement 731107.

Optional:

- I authorise the CLONETS project participants to process my personal data as described in the External Information Sheet, after the end of European Union Grant Agreement 731107.

Date:

Signature:

Annex 5. Internal Informed Consent Form Template

The presentation of the consent form may be adapted to the medium of communication: paper, web, etc. Given the nature of the personal data to be processed, consent may be obtained through online forms. The template is as follows:

CLONETS – CLock NETwork Services

Internal Informed Consent Form

This form is intended for individuals having a role in the organisation, running and reporting of the CLONETS project, such as personnel of the beneficiaries and third parties to the Grant Agreement, Advisory Board members, etc. Before completing it, please read the CLONETS Internal Personal Data Protection Information Sheet, which is available here: <http://www.clonets.eu/path-to-internal-information-sheet>.

Name:

Employer:

Position:

Telephone:

Email:

I confirm that I have read and understood the CLONETS Internal Personal Data Protection Information Sheet (referred to below as the Internal Information Sheet).

I authorise the CLONETS project participants to process my personal data as described in the Internal Information Sheet, for the duration necessary for the purpose of fulfilling European Union Grant Agreement 731107, including any procedures or reviews after its final date.

Optional:

- I authorise the CLONETS project participants to process my personal data as described in the Internal Information Sheet, after the end of European Union Grant Agreement 731107.

Date:

Signature: