Deliverable 1.2

Ethics Plan

Dissemination level		
PU	Public — fully open (automatically posted online)	X
SEN	Sensitive — limited under the conditions of the Grant Agreement	

Cover and Control Page of Document	
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2.0	14.08.2023	Camilla Halinoja (VTT)	Ethics Summary Report referral added in the Executive summary and Chapters 1 and 4. Ethics Summary Report added as Appendix 2.

[1] **DATA** = data sets, **DEC** = Websites, patent filings, videos, etc; **DEM** = Demonstrator, pilot, prototype, **ETHICS**; **OTHER**; **R** = Document, report.

Disclaimer

This deliverable is based on the project Grant Agreement, Consortium Agreement, relevant guidelines by the European Commission, and the VTT general template for Ethics Plan.

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Content

Abbreviations

ALTAI	Assessment List for Trustworthy Artificial Intelligence
CO	Project Coordinator (VTT)
DECP	Dissemination, Exploitation and Communication Plan (project deliverable 7.1)
DMP	Data Management Plan (project deliverable 1.3)
EC	European Commission
GDPR	General Data Protection Regulation
PQMP	Project Quality Management Plan (project deliverable 1.1)
RCR	Responsible Conduct of Research
TENK	Finnish National Board on Research Integrity
WP	Work Package
WPL	Work Package Leader

Executive Summary

The deliverable D1.2 *Ethics Plan* provides a joint ethics framework for the ADMIRAL project and its consortium. The deliverable outlines the ethical requirements related to the project, and the ethics procedures to be secured by the consortium members when executing the project to ensure that the project fulfils the relevant ethics requirements. The ADMIRAL proposal was evaluated by external reviewers and the evaluation result in the Ethics Summary Report was as follows: "Ethics opinion: Ethics clearance (the proposal is 'ethics ready')".

The ADMIRAL consortium has committed to carrying out the project in line with the highest ethical standards and the applicable EU, international, and national law on ethical principles, as required in the Grant Agreement Article 14.1 on Ethics as well as Annex 5. Moreover, the beneficiaries are committed to ensuring the respect of fundamental EU values, such as respect for human dignity, freedom, democracy, equality, and the rule of law and human rights, including the rights of minorities. The consortium also applies the 'do no harm' principle to all activities.

In addition to the general ethics principles and relevant legislation, the consortium commits to following the practices jointly agreed upon in this document. 'Ethics' will be included as a fixed agenda point for each ADMIRAL General Assembly meeting to ensure that any ethics-related questions and issues raised during the project can be addressed in a timely manner collaboratively by consortium members.

The deliverable begins by defining the general concepts of research ethics and research integrity. This is followed by the consortium's testimony to comply with the general ethical principles and relevant legislation. Then, the specific ethical dimensions relevant to the ADMIRAL project are assessed, followed by the introduction of the ADMIRAL ethics monitoring process. The deliverable is concluded with final words.

1 Introduction

Ethics is a vital aspect of the project and its research activities, supporting the identification of ethical concerns and reacting to them to prevent potential harm. The Ethics Plan introduces the actions and responsibilities of the consortium members to ensure that highest ethics requirements are satisfied in the consortium collaboration and beyond. The Plan also outlines the ethics management and monitoring practices for the project.

The deliverable has been prepared by the Project Coordinator (CO), VTT, based on the relevant sections of the EC's guideline on *How to complete your ethics self-assessment*[2] as well as other supporting documentation, including the VTT general template for the Ethics Plan. Moreover, the Ethics Summary Report of the ADMIRAL proposal can be found as Appendix 2. As an outcome of the analysis, the proposal was classified as follows: "Ethics opinion: Ethics clearance (the proposal is 'ethics ready')".

The document is a core part of Task 1.3 *Ethics management* which is drafted to ensure that the project follows the ethics appraisal procedures of Horizon Europe. The aim is to ensure that the provisions of ethics regulations and rules are respected. As task leader, VTT will act as Ethics Mentor to the consortium by monitoring the ethics issues involved in the project and how they are handled. While VTT coordinates the ethics management of the project, all consortium members are responsible for acting according to the highest ethical principles and in goodwill.

The following chapters address the central aspects of ADMIRAL ethics management and monitoring. We begin by defining the general concepts of research ethics and research integrity, which form the basis for the Responsible Conduct of Research. We also provide examples of contexts of ethical research practices, including dissemination and communication actions. We also define research misconduct and other unacceptable practices so that the consortium has a common understanding of what type of actions we avoid. The following Chapter states the consortium's compliance with general ethical principles and relevant legislation. Then, the specific ethical dimensions identified as relevant to the ADMIRAL project in the proposal phase are addressed. Finally, the deliverable is concluded by presenting the project's ethics monitoring process as well as the final words.

2 Ethical research practices

2.1 Research ethics

The term *research ethics* is a general concept that covers all ethical viewpoints and evaluations that are related to science and research. In general, ethics are norms of conduct that distinguish between acceptable and unacceptable behaviour. As people can interpret ethical norms in different ways in

[2] How to complete your ethics self-assessment, Version 2.0, 13 July 2021. https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/how-to-complete-your-ethics-self-assessment_en.pdf

light of their own values and life experiences, it is necessary to establish common definitions and rules in the framework of the project.

In the ADMIRAL project, 'ethics' is perceived as defined by the European Commission (EC)[3], according to which, ethics

> "includ[e] questions of legal and regulatory compliance as well as a branch of philosophy. It is part of a process of 'governance'. The consideration of ethical issues, starting at the conceptual stage of a proposal, enhances the quality of research, increases its likely social impact, promotes research integrity, promotes a better alignment of research with social needs and expectations and, finally, supports the societal uptake of the fruits of research because high ethical standards generally merit public trust."

The ADMIRAL consortium acts in line with this notion and sees complying with research ethics as the core of conducting high-quality research. In particular, the ethical norms sustained in ADMIRAL are Impartiality, Reliability, Integrity, and Responsibility. These norms stress the importance of good and responsible practices and lay the foundations for sincere, reliable, and confidential cooperation among the consortium members and other stakeholders. The norms are closely tied with the notion of research integrity which is addressed next.

2.2 Research integrity

In addition to research ethics, good research practices are based on fundamental principles of *research integrity*. Research integrity emphasises the honesty and integrity that all researchers are required to carry out in their research activities. The research integrity principles guide researchers in their work as well as in their engagement with the practical, ethical, and intellectual challenges inherent in research.

The beneficiaries are committed to respecting the fundamental principle of research integrity as set out in the *European Code of Conduct for Research Integrity*[4] document provided by ALLEA - All European Academies -group. The ALLEA document states that "good research practices are based on fundamental principles of research integrity. They guide researchers in their work as well as in their engagement with the practical, ethical, and intellectual challenges inherent in research".

According to the *European Code of Conduct for Research Integrity*, the fundamental principles of research integrity are:

- reliability in ensuring the quality of research reflected in the design, the methodology, the analysis, and the use of resources
- honesty in developing, undertaking, reviewing, reporting, and communicating research in a transparent, fair, full, and unbiased way

[3] Roles and Functions of Ethics Advisors/Ethics Advisory Boards in EC-funded Projects. https://ec.europa.eu/research/participants/data/ref/h2020/other/hi/ethics-guide-advisors_en.pdf

[4] European Code of Conduct for Research Integrity of ALLEA (All European Academies) https://www.allea.org/wp-content/uploads/2017/05/ALLEA-European-Code-of-Conduct-for-Research-Integrity-2017.pdf

- respect for colleagues, research participants, society, ecosystems, cultural heritage, and the environment
- accountability for the research from idea to publication, for its management and organisation, for training, supervision, and mentoring, and for its wider impacts.

In addition to the European Code of Conduct for Research Integrity, the beneficiaries are committed to following other relevant international and national research integrity guidelines. For example, VTT has committed to complying with the guidance of the Finnish National Board on Research Integrity (TENK) on Responsible Conduct of Research (RCR)[5]. VTT expects all beneficiaries to respect ethical principles and advises on ethical questions as Ethics Mentor of the consortium.

2.3 Contexts of ethical research practices

Ethically sound research practices – which are based on the previously addressed research ethics and research integrity – apply to different contexts of conducting research. These contexts are defined by ALLEA as follows:

- Research Environment
- Training, Supervision and Mentoring
- Research Procedures
- Safeguards
- Data Practices and Management
- Collaborative Working
- Publication and Dissemination
- Reviewing, Evaluating and Editing

Continuous supervision and guidance are done by the management of the project to ensure that good research practices are sustained in all these contexts. Notably, all participating organisations as well as individual researchers and management staff are responsible for following good research practices in all of the relevant contexts. This includes reporting any potential misconduct (addressed in more detail in Chapter 2.5) to the Coordinator and other relevant stakeholders.

2.4 Notes on communication and dissemination activities

The ADMIRAL communication and dissemination activities are planned on high ethical compliance and conduct by design. Some basic principles of these topics have already been introduced in Deliverable 1.1 *Project Quality Management Plan,* which was submitted in the Funding & Tenders Portal in June 2023. The detailed guidelines for these topics will be introduced in Deliverable 7.1 *Dissemination,*

[5] The official website of the Finnish National Board of Research Integrity TENK for the Responsible Conduct of Research (RCR) https://tenk.fi/en/research-misconduct/responsible-conduct-research-rcr

Exploitation and Communication Plan. In this Chapter, we limit to mention a few fundamental aspects of communication and dissemination activities from the ethics perspective.

To begin with the content of the research, the ADMIRAL researchers acknowledge that, unless otherwise specified, they are fully responsible for it from the drafting phase to publication. The authors should ensure that their work is made available to colleagues in a timely, open, transparent, and accurate manner unless otherwise agreed upon. When communicating with the general public and the media, the consortium members are fully committed to honesty and impartiality.

While the researchers are fully responsible for the content of the research, the EC and funding agency CINEA are not. Thus, all ADMIRAL communication, publication, and dissemination activities will include (whenever possible) the following EC acknowledgement of funding, including the following disclaimer:

> "Co-funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or the granting authority CINEA. Neither the European Union nor the granting authority can be held responsible for them."

The text should be translated into local languages, where appropriate.

Regarding authorship, the ADMIRAL consortium defines that authorship should be based on significant contribution to the design of the research, relevant data collection, or the analysis or interpretation of the results. The consortium members must acknowledge the work and intellectual contributions of others, including collaborators, assistants, and funders. Accordingly, researchers should not be added as authors merely due to their work position or to increase the visibility of a publication.

Finally, in addition to acknowledging the contribution of fellow researchers and sources of information as well as the received EC funding, the ADMIRAL consortium members are committed to disclosing any conflicts of interest and financial or other types of support for the research or for the publication of its results.

2.5 Research misconduct and other unacceptable practices

The ADMIRAL consortium is committed to conducting research with the highest ethical standards and has a zero-tolerance policy for research misconduct, disregard for responsible conduct of research, and other unacceptable research practices. To ensure common understanding, the following examples of research misconduct and other unacceptable practices are presented.

Research misconduct can be, for example,

- fabrication, i.e., making up results and recording them as if they were real.
- falsification, i.e., manipulating research materials, equipment or processes or changing, omitting, or suppressing data or results without justification.
- plagiarism, i.e., using other people's work and ideas without giving proper credit to the original source, thus violating the rights of the original author(s) to their intellectual outputs.

- misappropriation, i.e., unlawful presentation of another person's result, idea, plan, observation, or data as one's own research.

Sometimes, research violations are not as distinct, in which cases they can be seen as disregarding the responsible conduct of research. Examples of these can be:

- denigrating the role of other researchers in publications
- reporting results and methods in a careless manner, resulting in misleading claims
- inadequate record keeping and storage of results and data
- publishing the same results many times as novel results (self-plagiarism)
- misleading the research community in other ways.

In addition, there are other unacceptable research practices practises which are condemned. These can be, for instance,

- manipulating authorship
- exaggerating one's own achievements (e.g., in CV)
- re-publishing substantive parts of one's own earlier publications without duly acknowledging it ('self-plagiarism')
- citing selectively to enhance own findings or to please editors, reviewers, or colleagues
- withholding research results
- delaying the work of other researchers, e.g. in the peer-review process
- allowing funders/sponsors to jeopardise independence in the research process or reporting of results
- accusing a researcher of misconduct or other violations in a malicious way
- exaggerating the importance and practical applicability of findings

To prevent any kind of misconduct, disregard, or other unacceptable practice to take place, the ADMIRAL consortium expects responsible behaviour and work from all its researchers and implements clear ethics monitoring processes. These are defined in Chapter 5 of this document.

3 Compliance with the general ethical principles and relevant legislation

The ADMIRAL consortium follows the ethics appraisal procedures set in Horizon Europe as well as the applicable EU, international and national law on ethical and research integrity principles. These include the *EU Charter of Fundamental Rights* and the *European Convention for the Protection of Human Rights*

and Fundamental Freedoms as well as its *Supplementary Protocols*. Moreover, the beneficiaries are committed to ensuring the respect of basic EU values (such as respect for human dignity, freedom, democracy, equality, the rule of law and human rights, including the rights of minorities). The aim is to ensure that the provisions on ethics regulations and rules are respected.

Throughout the project lifecycle, the beneficiaries are committed to paying particular attention to the principle of 'do no harm', the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of persons, the right to non-discrimination, the need to ensure the protection of the environment and high levels of human health protection. The beneficiaries must ensure that the activities under the action have an exclusive focus on civil applications.

In particular, the consortium confirms respecting national and EU legislation, including:

- Declaration of Helsinki 1964 (version 2013)
- EU Directive on the Protection of Data: 95/46/EC
- The Charter of Fundamental Rights of the European Union
- EC Directive 86/609/EEC; ETS 123, 2010/63/CE
- Directive 98/44/EC of the European Parliament and of the Council of 6 July 1998 on the legal protection of biotechnological inventions
- Declaration of Helsinki of the WMA (DoH2008)
- EG-GCP Note for Guidance
- ETS N. 195 of 25.01.2005. Additional Protocol to the Convention on Human Rights and Biomedicine, concerning Biomedical Research
- International Ethical Guidelines for Biomedical Research Involving Human Subjects. Council for International Organisations of Medical Sciences (CIOMS) ISBN 92 9036 075 5
- Decision No 1982/2006/EC of the European Parliament and of the Council of 18 December 2006
- Directive 2001/20/EC of the European Parliament and of the Council of 4 April 2001 on the approximation of the laws, regulations and administrative provisions of the Member States relating to the implementation of good clinical practice in the conduct of clinical trials on medicinal products for human use. OJ L 121, 1.5.2001
- ETS N. 164 of 04/04/1997. Convention for the protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine: Convention on Human Rights and Biomedicine
- 13ETS N. 168 of 12/01/1998. Additional Protocol to the Convention for the Protection of Human Rights and Dignity of the Human Being with regard to the Application of Biology and Medicine, on the Prohibition of Cloning Human Beings

4 Specific ethical dimensions relevant to ADMIRAL

4.1 Overview

In the Ethics Summary Report, the ADMIRAL proposal was evaluated as follows: "Ethics opinion: Ethics clearance (the proposal is 'ethics ready')" (see Appendix 2) and was therefore approved for granting without further ethics clarification requests. However, there are some specific ethical dimensions that are relevant to ADMIRAL. These were identified in the proposal preparation and will be taken into particular consideration during the lifetime of the project. The identified dimensions are:

- Humans
- Artificial Intelligence
- Safety and Security

These aspects are addressed separately in the following sub-chapters of this deliverable. If further ethics dimensions are identified as relevant by any consortium member throughout the lifetime of the project, they should inform the Coordinator without delay and take action as defined in Section 5 of this deliverable.

4.2 Humans

The ADMIRAL consortium conducts different activities, such as interviews, surveys and questionnaires, with experts and pilot users, that involve humans. These activities may include collecting personal data. Examples of personal data are name, e-mail address, identity card number, car registration number, audio, or video[6]. For example, the cargo flow data obtained in Work Package 5 may include personal data to a minor extent, e.g., the name of a buyer, seller, or driver. In addition, a Stakeholder Collaborative Forum is going to be formed, for which members of the ADMIRAL consortium have prepared a privacy notice document that may be used as an example also in other project activities (Appendix 1. Privacy notice for Stakeholders' Collaborative Forum).

The ADMIRAL consortium does not foresee any negative impact on humans participating in these research activities. On the contrary, the idea of the activities is to improve the usefulness and usability of the developed technologies, which may provide improvements to the persons' work. All participants of the project activities, e.g., interviewees, are adults and able to give informed consent, and their participation will be on a voluntary basis, depending on their acceptance of their informed consent. In accordance, the ADMIRAL consortium follows in all project work the EU Charter of Fundamental

[6] Tietosuoja.fi (data protection) website definition on personal data https://tietosuoja.fi/en/what-is-personal-data

Rights[7], for example, Art. 7 *Respect of private and family life*[8] and Art. 8 *Protection of personal data*[9], as well as the principle of the Right to Integrity of the Person[10].

The ADMIRAL partners organising the activity in question must take care of the operation in accordance with the General Data Protection Regulation (GDPR) and are responsible for, e.g., preparing a privacy notice suitable for each situation. Moreover, the organisers of the activity will explain to the participants what the research is about, why the data is collected, and what they consent to. The use of the responses and how the single persons or organisations are tied to specific replies are also explained to the respondents and interviewees. All the interviewees and respondents will be asked for their consent to ensure that all the participants know their rights related to the use of their responses and that the usability of data is secured in an ethical and sustainable way. The informed consent to participate in the research may be requested in writing or orally, or it can be given by otherwise implying active consent (e.g., part of questionnaire). For example, an interview participant can give either written consent with their signature, ticking a box in an online form, or oral consent. If oral consent is given, it should be recorded.

Informed consent forms will be prepared in languages understandable by the experts and pilot users participating in the surveys and interviews conducted in the project. The personal details and identifications obtained from the ADMIRAL activities are handled according to the national and international legislative requirements, including the GDPR principles and will be kept confidential in any public documents that may be produced using the data.

Access to personal data gathered in the interviews and surveys is limited to the dedicated project partners' employees on a need-to-know basis for research purposes. If there is a processor processing personal data on behalf of any controller, the controller in question is responsible for completing a data processing agreement with the processor as well as providing the legally required information to the data subjects. All project partners that are involved in processing personal data are accountable for compliance with the applicable legislative requirements.

4.3 Artificial Intelligence

ADMIRAL leverages Artificial Intelligence techniques such as machine learning. The AI utilised is not designed to create unanticipated goals that can control the system or allow it to provide reasoning that is not aligned with expected system outputs. In ADMIRAL, humans will always oversee the developed technology and the development is always conducted with people as part of it. Human operators will be able to monitor the behaviour of the AI application and can identify inconsistencies and take corrective actions if necessary. AI technologies are used to support human decision-making or automated routine tasks. The anticipated work is not biased against any particular groups within the society and is aligned with public morals and ethics. It does not screen people for any reason where

[7] EU Charter of Fundamental Rights http://fra.europa.eu/en/eu-charter
[8] EU Charter of Fundamental Rights Article 7 Respect of private and family life http://fra.europa.eu/en/eu-charter/article/7-respect-private-and-family-life
[9] EU Charter of Fundamental Rights Article 8 Protection of personal data http://fra.europa.eu/en/eu-charter/article/8-protection-personal-data
[10] European Commission Right to Integrity of the Person https://commission.europa.eu/aid-development-cooperation-fundamental-rights/your-rights-eu/know-your-rights/dignity/right-integrity-person_en

they can be discriminated against or stigmatised for. The technology only focuses on the digitalisation of permission and compliance processes based on existing laws defined for the country of each participating partner.

ADMIRAL follows the European Commission High-Level Group on AI's *Ethics guidelines for trustworthy AI* to guide AI technologies' development. ADMIRAL utilises the *Assessment List for Trustworthy Artificial Intelligence (ALTAI)* as a reference in assessing AI ethics. Moreover, ADMIRAL follows updates on the approval of the Artificial Intelligence Act of which adoption is currently pending to be approved by the EU legislator.

If or when relevant, the ADMIRAL consortium will follow the EC guideline *Ethics by Design and Ethics of Use Approaches for Artificial Intelligence*[11] and sustain the *European Approach to Artificial Intelligence*[12].

4.4 Safety and Security

ADMIRAL does not raise considerable risks to the health and safety of researchers or participants. The project does not involve the use of potentially harmful substances, processes, technologies, organisms, or materials in a manner that would raise significant concerns about individual security, safety, or protection of public health, or the environment.

All ADMIRAL researchers have committed to following appropriate occupational health and safety measures in ADMIRAL. VTT as coordinator, complies with the national and European legislation on Protection of Environment and Occupational Safety and expects all the partners to do the same.

5 Ethics management in ADMIRAL

The ADMIRAL consortium sees ethics as a cross-cutting horizontal theme to the research conducted in the project. Ethical compliance is monitored, in particular, through Task 1.3 Ethics Management which is led by VTT and supported by all project partners. The aim of the ethics activities in the project, including this Ethics Plan, is to ensure that the provisions of ethics regulations and rules are respected.

The central ethics management processes and monitoring tools in ADMIRAL are as follows:

1. **Ethics Plan**: The document at hand serves as the main tool for all members of the consortium to 1) familiarise themselves with the ethical principles and regulations that the consortium is committed to as well as the ethics issues that need particular attention in the project, and 2) refer to jointly agreed ethics monitoring activities and guidelines.

2. **Shared and personal responsibility**: While VTT leads the ethics management task, each ADMIRAL consortium member is responsible for complying with the set ethical principles and

[11] European Commission guideline: Ethics by Design and Ethics of Use Approaches for Artificial Intelligence https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/ethics-by-design-and-ethics-of-use-approaches-for-artificial-intelligence_he_en.pdf

[12] European Commission: A European Approach to Artificial Intelligence https://digital-strategy.ec.europa.eu/en/policies/european-approach-artificial-intelligence

practices as well as relevant legislation. Moreover, everyone is expected to report on any new ethical issues they might come across during the course of the project. VTT acts as Ethics Mentor to the consortium on a need basis.

3. **Regular meetings**: Ethics will be a fixed topic in each General Assembly meeting of the project. Moreover, ethical issues are going to be discussed in the more frequent Management Committee meetings whenever necessary.

4. **Project Quality Management Plan (PQMP)**: The PQMP (D1.1) was developed in order to ensure (i) the management of project-related documentation, (ii) monitoring and quality control of project deliverables and milestones, and (iii) risk contingency management. Acting according to the agreed principles is crucial for ensuring that the ADMIRAL project is executed in a high-quality, timely, and ethical way.

5. **Data Management**: Data management is closely connected to the ethical conduct of research and therefore the Data Management Plan (DMP) acts as an important tool for ensuring good ethics practices as well. The DMP is updated regularly throughout the project. The Data Manager, Jukka Kääriäinen (VTT), appointed to the position by the ADMIRAL General Assembly, will monitor the project data management as a whole.

6. **Dissemination, Exploitation and Communication Plan (DECP)**: the project DECP is launched and implemented to provide a jointly agreed strategy for the relevant activities in an ethical, coherent and effective way. The DECP is to be submitted as Deliverable 7.1 in October 2023 and will be available for the partners throughout the project.

7. **Risk Management Plan**: Risk management is also tied closely to ethics management. The project risks are addressed as a fixed agenda point in the General Assembly meetings. Each identified risk will have its “owner” whose responsibility is to monitor the risk and inform the consortium of any changes. In addition, all consortium members are expected to report any new risks they may identify during the lifetime of the project.

8. **Process for handling allegations of research misconduct**: the ADMIRAL consortium has a zero-tolerance policy for research misconduct, disregard for responsible conduct of research and other unacceptable practices in research. Should any consortium member detect such activity, they must inform the Coordinator without delays. The Coordinator then investigates the matter and takes necessary actions to make sure that any potential risks, breaches of information, or harm are minimised. If necessary, the Coordinator informs the CINEA Project Officer.

9. **Record keeping**: the consortium maintains detailed records of all ethical decisions and actions taken during the project, including minutes of consortium body meetings, reports on any ethical breaches, and documentation of any modifications made to the ethics plan.

Overall, the monitoring and overseeing of ethics is an ongoing and dynamic process that should be tailored to the specific ethical issues and risks associated with the research project. It is essential to

maintain open communication within the consortium and with stakeholders and to respond promptly to any ethical concerns that may arise.

6 Conclusions

This deliverable summarises the ADMIRAL consortium's ethics plan, including the main ethical aspects related to the project as well as the ethics management procedures to be implemented. We have defined the important concepts of research ethics and integrity as the basis of Responsible Conduct of Research and declared the consortium's compliance with them as well as other relevant national and international legislation.

All consortium beneficiaries and individual researchers commit to complying with the set requirements, principles, and regulations. While VTT as coordinator acts as ethics mentor and leader of the Ethics monitoring Task, all researchers are responsible for acting according to the commonly agreed processes in this deliverable. The deliverable will be updated regularly upon request and needs of the consortium.

Appendix 1. Privacy notice for Stakeholders' Collaborative Forum

1. Privacy Notice for Research

In accordance with EU General Data Protection Regulation (2016/679, "GDPR") and applicable national legislation (including Finnish Data Protection Act 1050/2018). Privacy notice is for purpose of informing the data subject about processing of personal data and his/ her data protection rights.

2. Name, duration and nature of the study

Name of the study/ research: ADMIRAL, Advanced multimodal marketplace for low emission and energy transportation / ADMIRAL Collaboration Forum

Duration of the study/ research: 1.5.2023 – 30.4.2026

Study/ research is: ☐ cross-sectional ☒ follow-up study

3. Controller(s), data protection officer(s) and contact person(s)

Name: VTT Technical Research Centre of Finland Ltd. ("VTT"), Business ID: 2647375-4

Address: Tekniikantie 21, 02150 Espoo, Finland

Contact information for data protection officer (DPO):

Address: VTT Technical Research Centre of Finland Ltd., Register Office,

P.O. Box 1000, FI-02044 VTT, Finland

E-mail: dataprotection@vtt.fi (DPO, data security and their substitutes)

Contact person or responsible research group of the study:

Name: Harri Pyykkö

Address: Tekniikantie 21, 02150 Espoo, Finland

E-mail: harri.pyykko@vtt.fi

Name: UNIVERSIDAD POLITECNICA DE MADRID ("UPM"), Business ID: Q2818015F

Address: Avda. de Ramiro de Maeztu, 7 28040 Madrid

Contact information for data protection officer (DPO):

Address: UNIDAD DE PROTECCIÓN DE DATOS UPM. Avda. de Ramiro de Maeztu, 7 28040 Madrid

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E-mail: josemanuel.vasallo@upm.es

List of the other ADMIRAL project participants ("ADMIRAL project participants") that have the access to the personal data:

TEKNOLOGIAN TUTKIMUSKESKUS VTT OY

UNIVERSIDAD POLITECNICA DE MADRID

AWAKE.AI OY

LABORATORIO NACIONAL DE ENGENHARIA CIVIL

UNIVERZA V LJUBLJANI

STEINBEIS INNOVATION GGMBH

TRANSPORTO INOVACIJU ASOCIACIJA

STEVECO OY

ETHNIKO KENTRO EREVNAS KAI TECHNOLOGIKIS ANAPTYXIS

CTLUP SRL

POSTA SLOVENIJE DOO

UAB NORMALIS TECH

SOLVESALL INTELIGENTNE RESTIVE DOO

TREVIO UAB

UAB CARGOGO LOGISTICS

CARGO SIGN, UAB

LOCODELS DOO

HP HRVATSKA POSTA DD

MARLOCONSULT LDA

BTL GROUP UAB

APS - ADMINISTRACAO DOS PORTOS DE SINES E DO ALGARVE, S.A.

UAB KLAIPEDOS LAISVOSIOS EKONOMINES ZONOS VALDYMO BENDROVE

4. Joint controller responsibilities

UPM is responsible for collecting and storing the personal data as stated in this privacy notice.

VTT provides Microsoft Teams environment for storing and sharing the personal data for ADMIRAL project participants.

ADMIRAL project participants have access to the personal data.

The registered person can exercise her/his rights regarding the processing of personal data centrally through the contact person identified in section 2 (VTT or UPM). If necessary, the contact person delivers the registered contact to other joint controllers.

5. Personal data categories

Processed personal data categories: ADMIRAL Collaboration Forum contact person information: name, organisation, country and email.

6. Purpose and legal basis of processing

Purpose of personal data processing: The data subjects represent stakeholders of the "ADMIRAL Stakeholder Collaboration Forum". Forum informs stakeholders about all project developments and facilitates collaboration on ADMIRAL activities, such as validation of pilots, surveys, workshops, market acceptance, etc.

Legal basis of processing[13]:

☐ Performance of a task carried out in the public interest, scientific or historical research purposes or statistical purposes, archiving purposes of research data and cultural heritage data (when processing after the study/ research)

☐ Legitimate interests pursued by the Controller(s) or by a third party

[13] GDPR Art. 6 and Finnish Data Protection Act 4 §.

legitimate interest concerned: [Describe the legitimate interest].

☒ Data subject's consent

☐ Other: [Describe other legal basis compliant with applicable legislation].

Legal basis of processing special categories of personal data and personal data relating to criminal convictions or offences, set forth in Section 4[14]:

☐ Data subject's explicit consent

☐ Processing relates to personal data which are manifestly made public by the data subject

☐ Scientific or historical research purposes or statistical purposes under legislative safeguard measures[15]

7. Data sources

Personal data is received / collected from the ADMIRAL Collaboration Forum stakeholder persons using contact form.

8. Recipients or categories of recipients

Personal data is provided to: Personal data will not be disclosed outside of the controllers and ADMIRAL project participants.

Personal data will be stored into VTT administrated Microsoft Teams environment (ADMIRAL project Teams).

9. Transfers outside the European Union or the European Economic Area

Personal data is transferred outside the European Union or the European Economic Area (noting i.a. location of servers and other access rights of service providers):

☒ No

☐ Not yet known but possible. Mechanism defined and informed on a case-by-case basis.

☐ Yes, on the following basis:

☐ Commission adequacy decision

[14] GDPR Art. 9 and Art. 10. Finnish Data Protection Act 6 and 7 §.
[15] GDPR Art. 9(2)(j) and Art. 89(1) and Finnish Data Protection Act 31 §.

☐ Binding corporate rules

☐ Commission standard data protection clauses

☐ Other: [Describe other legal basis compliant with applicable legislation.]

The data will be stored on servers located in the EU/EEA area, using Microsoft TEAMS service. More information and terms and conditions of this service:

- https://docs.microsoft.com/en-us/compliance/regulatory/gdpr
- https://www.microsoft.com/licensing/docs

10. Automated decision making

No automated decision making occurs in the research.

11. Retention period of personal data after the research

☒ Research data and personal data is destroyed after the research.

☐ After the research, research data is retained for [insert a retention period or describe criteria for determining said period] and

☐ personal data is anonymised

☐ personal data is pseudonymised [fill in to section 5 archiving]

☐ it contains direct identifiers of the data subject, for the following reason: [Describe why identifiers are retained and fill in to section 5 archiving.]

12. Protection principles

In performance of research, research data:

☐ is anonymized before commencing the research

☐ is pseudonymised before commencing the research

☒ contains direct identifiers of the data subjects

Personal data processed in data systems is protected with:

☒ username

☒ password

☒ multi-factor authentication (MFA)

☒ access control with IP address

☒ user monitoring (log)

☒ access control

Encryption method of data transmission:

☐ in transmission: [Describe]

☐ for data file: [Describe]

☐ other, what: [Describe]

13. Rights of the data subjects

The data subjects have the rights listed below, which however may be exempted from and/or not applied on grounds set forth in applicable legislation. Exemptions and restrictions are considered for each case separately.

The data subject can exercise these rights by contacting Controller with information set forth in section 2, preferably by email.

- Right to withdraw consent (and right to erasure)
- Right of access
- Right to rectification
- Right to erasure (“right to be forgotten”)
- Right to restriction of processing
- Right to data portability
- Right to lodge a complaint with a supervisory authority

Further description of data subject’s rights:

Right to withdraw consent

If the processing is based on consent, the data subjects have the right to withdraw their consent on which the processing is based on. This shall not affect the lawfulness of processing based on consent before its withdrawal.

Right of access

The data subjects have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her is being processed and access to his or her personal data and information concerning the processing of his or her personal data.

Right to rectification

The data subjects have the right to obtain from the controller rectification of inaccurate personal data concerning him or her. The data subjects have the right to have incomplete personal data completed.

Right to erasure ("right to be forgotten")

The data subjects have the right to obtain from the controller the erasure of personal data concerning him or her.

Right to restriction of processing

The data subjects have the right to obtain from the controller restriction of processing.

Right to data portability

Where the processing is based on the data subject's consent and carried out by automated means, the data subjects have the right to receive the personal data concerning him or her, which he or she has provided to the Controller and have the right to transmit those data to another controller.

Right to lodge a complaint with a supervisory authority

The data subjects have a right to lodge a complaint with a supervisory authority if the data subject considers that the processing of personal data breaches the data subject's rights pursuant to applicable law. In Finland, see Finnish Data Protection Ombudsman contact information: https://tietosuoja.fi/en/contact-information

Appendix 2. Ethics Summary Report

Ethics Summary Report

Call Reference	HORIZON-CL5-2022-D6-02
Proposal Number	101104163
Acronym	ADMIRAL

Ethics Issues

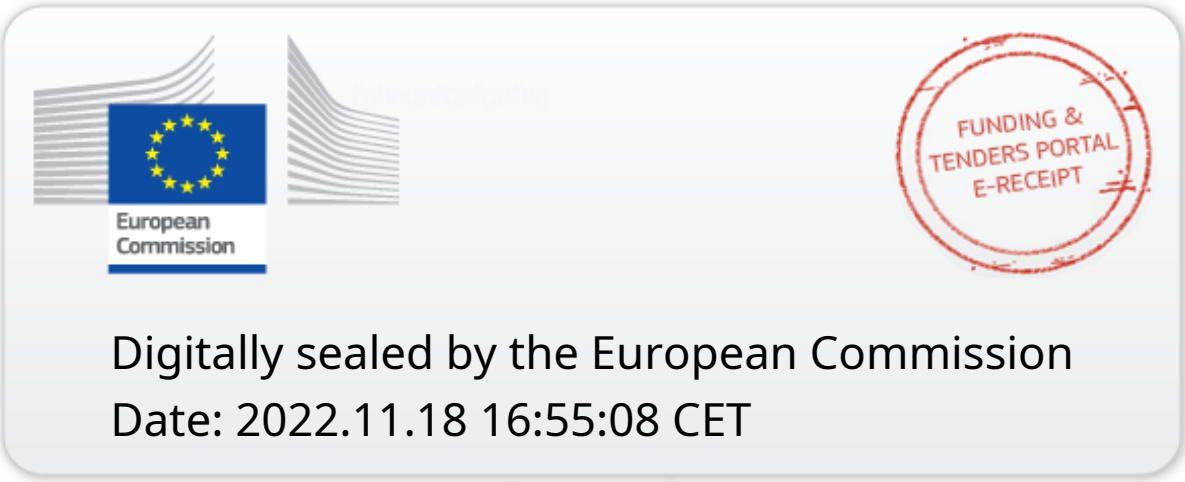
Humans	**Yes**
Personal data	**Yes**
Artificial intelligence	**Yes**

Ethics Opinion

Ethics clearance (the proposal is 'ethics ready')

General requirement applicable to all grants

The beneficiaries must ensure that all ethics issues related to activities in the grant are addressed in compliance with ethical principles, the applicable international and national law, and the provisions set out in the Grant Agreement. This includes the ethics issues identified in this report and any additional ethics issues that may emerge in the course of the grant. In case any substantial new ethics issues arise, beneficiaries should inform the granting authority. For each ethics issue applicable, beneficiaries must follow the guidance provided in the How to complete your ethics self-assessment.



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