



D5.2. DATA MANAGEMENT PLAN

WP5 – Communication, dissemination, exploitation and clustering activities.

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LIST OF ABBREVIATIONS AND DEFINITIONS

| Abbreviation | Definition |
|--------------|--|
| BTO | Barium titanate (BaTiO ₃) |
| CA | Consortium Agreement |
| CAD | Computer Aided Design |
| CSV | Comma-Separated Values |
| DMP | Data Management Plan |
| DoA | Description of Action |
| EC | European Commission |
| FAIR | Findable, Accessible, Identifiable, Reusable |
| GA | Grant Agreement |
| GDPR | General Data Protection Rules |
| HADEA | Health and Digital Executive Agency |
| IBMH | IBM Haifa (Israel), partner |
| IBMZ | IBM Zürich (Switzerland), partner |
| KUL | KU Leuven (Belgium), partner |
| M | Month |

| | |
|--------------|---|
| LUM | Lumiphase (Switzerland), partner |
| OPT | Optalysys (United Kingdom), partner |
| PC | Project Coordinator |
| PIC | Photonic Integrated Circuit |
| PNO | PNO Consultants (Spain), partner |
| SaaS | Software-as-a-Service |
| SiN | Silicon nitride (Si_3N_4) |
| UPV | Universitat Politècnica de València (Spain), partner |
| VOx | Vanadium oxide (e.g. VO_2 , V_2O_3) |
| WP(s) | Work Package(s) |

Short name and name of beneficiaries

| Short name | Name |
|------------|---|
| KUL | KATHOLIEKE UNIVERSITEIT LEUVEN |
| NTC - UPV | Nanophotonics Technology Center - UNIVERSITAT POLITECNICA DE VALENCIA |
| IBMH | IBM ISRAEL - SCIENCE AND TECHNOLOGY LTD |
| PNO ES | PNO INNOVATION SL |
| LUM | LUMIPHASE AG |
| IBMZ | IBM RESEARCH GMBH |
| OPT | OPTALYSYS |

EXECUTIVE SUMMARY

The purpose of this document, Data Management Plan (DMP), is to provide an analysis of the main elements of the data management policy that will be used in the PHOENIX project regarding all datasets that will be generated or collected by the project. The DMP intends to provide an overview of how the data within PHOENIX will be used and handled.

The document describes the way in which the PHOENIX consortium will manage the datasets that will emerge from the project, and how best practices in terms of metadata and archiving will be used to ensure that the data will be Findable, Accessible, Interoperable, and Reusable (FAIR) for other potential users. Furthermore, the DMP provides information about what datasets the consortium is aiming to preserve and in which format.

A more comprehensive version of the DMP might be issued later on, when the Consortium will be able to provide major details regarding datasets and specific management policies based on the progresses of the project.

1. INTRODUCTION

The purpose of the Data Management Plan (DMP) is to provide an analysis of the main elements of the data management policy that will be used in the PHOENIX project regarding all datasets that will be generated or collected by the project. The DMP provides an overview of how the data within PHOENIX will be used, handled and secured in compliance with GDPR. All data generated and collected by the individual participants will be curated and stored on secure servers (when needed) according to the individual participant's current processes and based on EU directives, including GDPR.

The document describes the way in which the PHOENIX consortium will manage the datasets that will emerge from the project, and how best practices in terms of metadata and archiving will be used to ensure that the data will be Findable, Accessible, Interoperable, and Reusable (FAIR) for other potential users. Furthermore, the DMP provides information about what datasets the consortium is aiming to preserve and in which format.

A more comprehensive version of the DMP will be issued later on, when the Consortium will be able to provide major details regarding datasets and specific management policies based on the progresses of the project. The DMP is a living document throughout the entire duration of the project and any change/update will be reported in the WP5 description of the Periodic Reports.

2. DATA SUMMARY

This section describes the dataset formats to be generated or collected, dataset reuse policy and usage policy and dataset utility.

The project partners will set up specific data curation methodologies for the management of different types of data throughout the whole lifecycle from the creation of the platform to the execution of the matchmaking processes and offline services. This will be done by ensuring that different principles are followed:

- **Confidentiality:** To ensure that data exchanged is not accessible to unauthorised users.
- **Integrity:** To protect data from to unauthorised modifications and ensure its accuracy and consistency throughout the whole lifecycle.
- **Availability:** To guarantee that data is available by users when it is needed.

2.1. DATASET CATEGORIES, FORMATS AND STANDARDS

The data sets that will be **generated and collected** in the PHOENIX project are foreseen to belong to the following different **categories**:

- **Contact data:**
 - Contact details of the people that voluntarily sign up for the project newsletter as well as through the contact form on the project website to contact the project's coordinator contacts.
 - Contact details of the people that voluntarily participate in the PHOENIX workshops and trainings.
 - Contacts collected as part of the more general interactions with people and stakeholders outside the project..

- Contacts from within the project consortium (e.g., internal email distribution lists, meeting attendees, etc).
- **Intellectual property data:** Given the importance of sustaining the technologies and platform services that will be developed by the partners through the PHOENIX project, it will be vital that intellectual property data related to the technologies, products and services will be ensured to be private and secure as innovators will be certainly reluctant to share it.
- **Legislation and standards:** PHOENIX may gather information on the relevant legislative and standards framework for the deployment of the different technologies from the partners.
- **General project dataset:** This includes all deliverables and reports that maybe generated during the project duration.
- **Other research data** (Concept, design, simulation, process and test data): PHOENIX will generate data related to the new photonic integrated circuit (PIC) design concepts employing BTO/SiN and VO material systems, from design to fabrication and test, as well as subsystem and system designs employing such PIC for the target applications.

The **formats and standards** of data that the project will generate/collect are as follows.

- To facilitate the data exchange, MS Excel compatible files including comma-separated values (CSV) and .xls/.xlsx formats will be also accepted.
- Where applicable, data formats may be migrated when new technologies become available and are proved robust enough to ensure digital continuity and continued availability of data.
- Wheesbee, as one of the main sources of information, is developed with the container Apache Tomcat9.0.
- Simulation data will be generated in the standard formats used by each simulation software (electrical, CAD, photonics, material properties).
- Deliverables and reports will be generated using MS Word document and Adobe Acrobat .pdf formats.

The exact data format and expected sizes will be updated in M12 of the project.

General project dataset: the following table reports a brief description of the general datasets that will be generated and processed in the PHOENIX project, resulted from the description of the action, and planned in the 36 months of the project.

Table 1 General project dataset

| Activity | Type of data generated/collected | WP | Diss. level | Preservation of data |
|--|---|-----------|--------------------|--|
| Periodic reports | Partners' information | 1 | SEN | Innovation Place |
| Deliverables | Partners' information, data regarding project procedures, activities, results, exploitation information... | All | SEN + PU | Innovation Place |
| Personal contact details of partners | Organisation information, including bank account, and business email and phone | 1 | SEN | Innovation Place, website repository |
| Communication material, Publications | Stakeholders information (name, organisation, email, phone), project information (activities, results) | 5 | SEN + PU | Innovation Place, website repository, open access repositories |
| Collaboration with other relevant networks and initiatives (including projects) | Project general information, contact data of coordinators, information about collaborative activities, publications, etc. | 5 | SEN + PU | Innovation Place |
| Brokerage events and training webinars | Registration data, training material, publications, presentations | 5 | SEN + PU | Innovation Place, website repository |
| Registration at the project website and | Name, organisation, email | 5 | SEN | Innovation Place, website repository |

| Activity | Type of data generated/collected | WP | Diss. level | Preservation of data |
|--------------------------------|---|-----|-------------|--|
| registration for newsletter | | | | |
| PHOENIX project generated data | Designs, simulations, process, test results | 2-4 | SEN | Innovation place, Partners' own repositories (yet to be defined) |

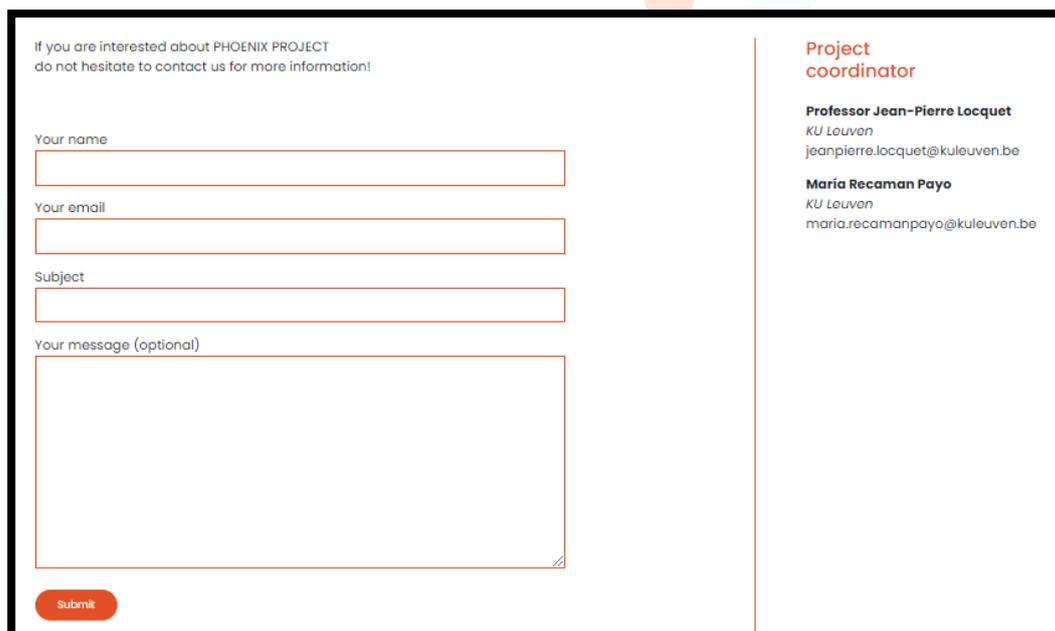
2.2. DATASET ORIGIN & SOURCES

The data sets that will be generated in the PHOENIX project are foreseen to be collected through the following **sources**:

2.2.1. DATA COLLECTED VIA PROJECT WEBSITE

(<https://www.heu-phoenix.eu>)

- a. **Contact data from people that use the online contact form** that is available on the PHOENIX website to establish contact with the project coordinator.



If you are interested about PHOENIX PROJECT do not hesitate to contact us for more information!

Your name

Your email

Subject

Your message (optional)

Project coordinator

Professor Jean-Pierre Locquet
KU Leuven
jeanpierre.locquet@kuleuven.be

Maria Recaman Payo
KU Leuven
maria.recamanpayo@kuleuven.be

Figure 1 PHOENIX contact form.

- b. **Contact data from people that are interested in receiving the PHOENIX newsletter** and voluntarily sign up through the registration form that is available on the project website.

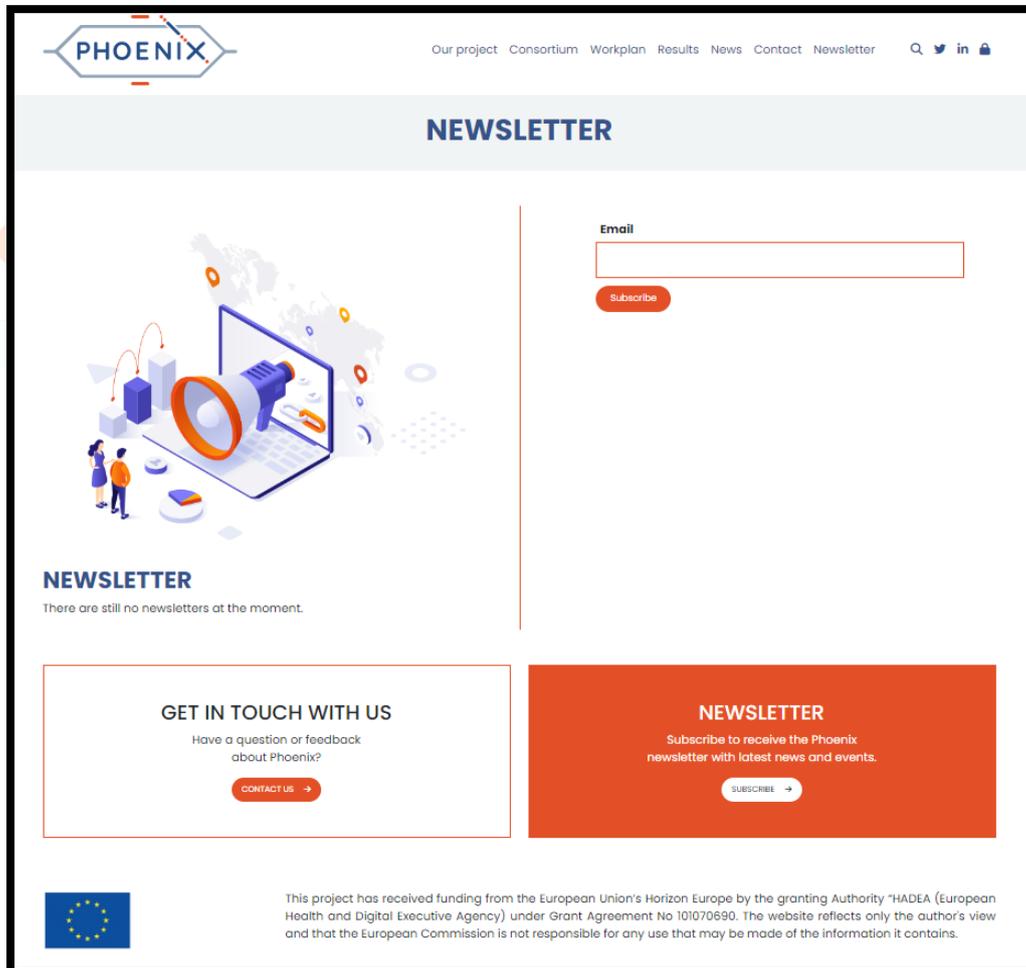


Figure 2 PHOENIX newsletter subscription section

- c. **Registration forms for training webinars and projects events.** These registration forms are not yet available and will be produced closer to the dates of these events.

2.2.2. DATA COLLECTED VIA PUBLIC ONLINE SOURCES (PUBLICLY AVAILABLE DATA):

- a) The project will use WheesBee¹ innovation search tool for tasks “T5.3 Stakeholders analysis and engagement” and “T5.4 Market analysis and exploitation plan”. This is a Semi-Automated Innovation Analytics (AIA) web platform that pulls information from publicly available sources to provide the user with on-demand innovation discovery and analysis capabilities, ad-hoc innovation analytics reporting tools, and in-platform dashboard mechanisms for reporting on the (changemaker, breakthrough, matured, and incremental) research hotspots, creative profile of institutional actors in project-based innovation activities (e.g. nationally-, regionally- or EU-funded innovation projects), and R&D outputs (i.e. patent data, bibliometric data). This tool will evaluate semantically the previously funded projects under European and national programmes as well as national and European patents. Through this analysis the project will gather data on potential technology providers (supply), end-users/buyers (demand), financing opportunities (including both public and private funding programmes as well as private investors), as well as examples of similar solutions (competitors). Also, public online sources will be used to identify the relevant legislative and standardisation frameworks relevant for PHOENIX activities. Finally, additional desk research will be done through online sources. The merged and analysed information will be saved on the PNO server and shared in the following manner:
- i. Amongst project partners through the PNO project management tool Innovation Place.
 - ii. On the PHOENIX website, section “Results”.
- b) Data collected through the PHOENIX partners’ own networks and experience as relevant sectorial representatives. This includes information on innovative PIC technologies, related EU projects, potential end users, market expectations, potential barriers to exploit the technology, financing programmes and private investors as well as legislative and standardisation information and end users requirements. This information will be gathered through e-mails, online forms

¹ <https://www.wheesbee.eu/>

as well as excel sheets. The merged and analysed information will be saved on the PNO server and shared in the following manner:

- i) Amongst project partners through the PNO project management tool Innovation Place.
- ii) On the PHOENIX website, section "Results".

The origin of the data is mainly from:

- Questionnaires to cluster and related EU projects.
- Data from interviews of stakeholder network members and/or workshop participants.
- Personal data upon requests of the consortium.
- Other platforms managed by the project partners.
- Commercial contacts

2.3. DATASET REUSE

PHOENIX project will reuse partner's proprietary data regarding designs, simulations, manufacturing processes and test that are necessary background for the internal developments envisaged in PHOENIX. Partner's access during project execution to necessary datasets stored in the available repositories will be granted following the procedures described in sections 3 and 5.

PHOENIX project will reuse publicly available information in order to develop stakeholders and market analysis in the frame of WP5.

When datasets are reused, proper cross-reference will be made.

2.4. DATA UTILITY

The data generated in the PHOENIX project will be useful exclusively for the execution of project activities. Access to data for third parties and their conditions will be assessed during the project execution as part of the business modelling and exploitation plan activities in WP5.

3. FAIR DATA

To make data collected and produced in PHOENIX project easily Findable, Accessible, Interoperable and Reusable (FAIR), whenever possible, the Data Management Plan includes the following information:

- Which data will be collected, processed and/or generated (dataset categories)
- How data will be gathered (origin & sources)
- Which formats and standards will be applied (format & standards)
- Which data will be shared in open access (Accessibility)
- Where data and how will be stored and preserved (Archiving and preservation)
- Data management during and after the end of the project (utility)

3.1. Making data findable, including provisions for metadata.

This section is focused on the general data collected and generated within the project; this information is mainly used by project beneficiaries linked to the PHOENIX internal management area.

Concerning the general data, it will be stored, by each responsible partner, following their internal policy guidelines and providing metadata making them discoverable.

All data, when possible, will have an associated metadata document (mainly deliverables or documents elaborated only for internal use of PHOENIX's consortium) which describes key aspects of the data.

Project deliverables are assigned a unique identifier: PHOENIX_Dn_title_v.XX. Where:

- "Dn" is associated to the deliverable number specified in the DoA
- "title" is the name of the deliverable
- "v" is referred to the version of the document, the letter "v" will be kept in the name of the deliverable
- "XX" is a number for the major revision (made by the responsible), (two digits).

The final versions of the documents will be simply labelled as version "final", as follows: "PHOENIX_D5.2_Data_Management_Plan_v.final".

All files made publicly available reference PHOENIX in their name. The filename shall be the concatenation of the following items separated by underscore ("_"):

- The Project name (PHOENIX)
- A meaningful short description of the file
- The word "DRAFT" followed by the letter "v" (meaning "version")
- The version letter "v" followed by the version number (two digits)
- The "final" version of the file will be identified as "v.final"

Photographs and audio/visual recordings are named PHOENIX_[event]_[date of event]_[description of event/photograph content, e.g., workshop/dinner/group meeting].

PHOENIX responsible partner of data creation will provide search keywords for optimising possibilities for re-use.

In the content of each document elaborated within the project, a clear versioning is indicated (v.xx) including creation date in DDMMYYYY format.

Deliverable reports include a data identification sheet and version log.

3.2. Making data accessible

Personal data processed in the project are not made publicly accessible but kept closed and inaccessible to third parties.

Public datasets are available from <https://www.innovationplace.eu/>. The access to Innovation Place repository for PHOENIX is restricted to project beneficiaries.

From here the fully anonymized data are accessible to anyone within the project, free of charge. The dataset will be as open as possible and as closed as necessary, according to the EC regulations.

All published data, if feasible, will be provided with a Digital Object Identifier (DOI): once published, datasets remain fixed over their lifetime, while the metadata can change.

Data will be published using standard file formats (txt, pdf, docx, xlsx, etc.). All data will be accessed using standard tools. Software relevant to access the data would be made available, but it is not seen as being a requirement. Should it be needed, the required open source to access and analyse the data, will be provided.

For the duration of the project, personal data will be stored on local secured server of:

- **PNO:** Responsible for all data related to documents generated within the project and personal data of beneficiaries involved (people associated to mailing lists). Data are stored on Innovation Place (see annex 1 for more details). Access to Innovation Place is controlled by WP5 leader (PNO ES), who will grant access to

the management area of the project once approved by the Coordinator. Only PNO and KUL (Coordinator) can manage the users appointed to the mailing lists. PNO is also responsible for the website hosting and management of people registered through the PHOENIX public website (see annexes 1, 2 and 3 for more details).

Archiving and preservation places are intended as the safety sites where data collected and generated during the project will be stored, protected, and managed.

At month 6 of PHOENIX's activities, the following preservation places are available:

3.2.1. INNOVATION PLACE

Innovation Place (<https://www.innovationplace.eu/>), is the project management platform used in PHOENIX and accessible only to project beneficiaries. The project private area provides functionality for beneficiaries' management, document repository and collaborative edition, mailing lists, and other tools to ease project management activities, offering as well dedicated views for each type of participant.

Innovation Place is hosted by PNO (SaaS) and reachable through an authentication system that is managed by PNO. The party responsible for this website (the "controller") for purposes of data protection law is:

PNO Group holding B.V. (PNO Consultants B.V. / PNO) is the controller and is located at Laan van Zuid Hoorn 15, 2289 DC in Rijswijk. PNO can be contacted at +31 (0) 88-838 13 81 or by e-mail at gdpr@pno.group

Its main security characteristics are:

- The platform is totally under secure connection using SSL protocol.
- The application stands on a dedicated machine not accessible from other/applications or domains.
- The machine is hosted by a primary world leading service with high-level physical and ICT security.
- The entire management is under PNO control and its access is restricted by certificates own by PNO administrators.

Backup:

- A backup of the entire system is done daily with a complete snapshot of the Linux virtual machine.
- Application backups (database, files, etc.) are executed with 24 hours frequency.
- Backup are stored on a separate storage disks provided by the hosting service.

The Innovation Place privacy policy and cookie policy are regulated as according to PNO's privacy policy as set out in Annex 2 and PNO's cookie policy as set out in Annex 3.

3.2.2. PHOENIX'S WEBSITE DATABASE

The PHOENIX public website (<https://www.heu-phoenix.eu>) is based on WordPress and utilizes external services, like Google Analytics, with the purpose to analyse the PHOENIX website and improve its content, as well as to measure users for proof to the European Commission.

Google Analytics is integrated into the PHOENIX website via a JS script. When a client (a user's end device) is requesting the website, a request will be sent to the Google Analytics end point including the property ID. The endpoint then places cookies on the user's end device in order to track their usage behaviour on the website. A Data Processing Agreement (DPA) with Google has been conducted. Data is not stored longer than necessary (24 months). Direct access to the data is not shared with third parties.

Hosting: the PHOENIX website is hosted by the subcontractor Innovation Engineering (INNEN) in Italy. An agreement has been conducted with INNEN, which abides to the general PNO rules described in Annexes 1-3.

Further information about the public PHOENIX website privacy policy is available as Annex 1 and at the project website [Cookie Policy](#) and [Privacy Policy](#).

Further preservation places for project data will be defined later and described in updated versions of the DMP.

3.2.3. OPEN ACCESS REPOSITORIES

Green or gold Open Access models will be applied to the publication of other research data and results managed or generated in the project always in compliance with GDPR and Intellectual Property Rights (IPR) principles, and respecting confidential information, and industrial trade secrets, according to the CA rules, in open repositories such as Open Research Europe, zenodo or OpenAire.

The publications will be also made available through the project's website.

3.3. Making data interoperable

As the project progresses and data is identified and collected, further information on making data interoperable will be outlined in subsequent versions of the DMP.

In the PHOENIX Project, the consortium uses standard file formats as noted above (see Section 2.1).

In the working groups of the project at WP level, we are currently in the discussion process to find out what kind of data structures are needed to capture the context and semantics in the application field of the project. Unfortunately, since there are no standardized ontologies that contain the entire domain knowledge, a hybrid tailored approach must be used.

3.4. Increase data re-use

This section will be compiled throughout the course of the project, when we get more information on the datasets that are made available for PHOENIX and the exploitation routes are better defined in WP5.

All Personal Identifiable Information will be restricted to internal usage and not going to be shared with third parties, except where the entities voluntarily choose to make them available to third parties always in compliance of the CA and GA rules. For shared information, standard format, open-source software, and proper documentation will guarantee re-usability by third parties.

GDPR will be followed for all data collected and managed in the project.

The implementation of quality assurance procedures will count on the support of all beneficiaries involved in the project.

4. OTHER RESEARCH OUTPUTS

Initially, other research outputs (e.g. simulation models, material design, subsystem designs, processing guidelines, etc) will be used internally by the PHOENIX partners for project execution. Whenever shared access is required, the involved partners will determine who needs to access these research outputs, either using the common project management platform and repository in Innovation Place or in a dedicated server to be determined. The involved partners will ensure that the FAIR principles are granted and will be made Open Access whenever possible.

5. ALLOCATION OF RESOURCES

PNO will manage the project management platform “Innovation Place” (as well as its own IT licenses rooms). The maintenance of such repositories is included into the budget of PNO and thus secured. All project partners have been provided free access to Innovation Place.

Each beneficiary leading Work Packages is responsible for preparing the datasets to make FAIR the data collected within its own activities, provided that KUL, as Project Coordinator and PNO as WP5 leader are co-responsible for general coordination and supervision.

Furthermore, consortium partners have the responsibility to make sure their activities are in line with all applicable local government and international laws, regulations and guidelines.

After the project, PNO and the partners will establish the allocation of resources to keep on sustaining the data storage on the relevant servers.

Carolina Salas (PNO), as the assigned **Data Protection Officer (DPO)**, shall ensure that consortium partners process and handle data of the project correctly and in compliance with the applicable data protection rules. In this sense, the partners that will be involved in the management of data have assigned the following DPOs, as summarized in Table 2.

Table 2 DPO of main beneficiaries processing personal data.

| | |
|------------------------------|--|
| | |
| KUL (coordinator) | María Recamán-Payo maria.recamanpayo@kuleuven.be |
| PNO ES | Carolina SALAS carolina.salas@pnoconsultants.com |

All data hosted on specific partner systems will be compliant to GDPR.

All other beneficiaries are committed to compliant to GDPR in all activities to be performed involving personal data of externals.

6. DATA SECURITY

As described in section 5 and Annexes 1-3, data access is restricted through the available repositories and preservation sites. Data is securely stored and preserved, shared among the partners for project implementation purposes and daily back-ups are performed.

Access to sensitive data to only the involved partners will be granted following the access to data management provisions described in section 5 and Annexes 1-3.

Whenever it is deemed beneficial to disclose personal or business data to third parties, informed consent will be requested beforehand.

7. ETHICS

As described previously in Section the PHOENIX project is fully compliant with the GDPR regulations laid out in 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 (20) and respects regulations on intellectual property rights (IPR).

No other Ethics related provision are envisage at the moment of delivery of this first issue of D5.2.

8. CONCLUSIONS

Since the DMP is expected to mature during the project, more developed versions of the plan will be produced at later stages (or whenever important changes to the project occur due to inclusion of new data sets, changes in consortium policies or external factors).

In this initial DMP we have described the requirements imposed on PHOENIX with regard to access to data. The project partners have decided to use Innovation Place a collaborative project website for document sharing and publication repository, and to link the repository to the PHOENIX project website.

Also, the project partners will use PNO's WheesBee innovation search tool to facilitate the search through public online sources. Lastly, the newly developed project website will serve as the main tool for gathering new project data sets.

In this document it is described the first group of datasets identified, these descriptions will likely need to be revised to provide updated versions as the PHOENIX project evolves.



Annex 1. PHOENIX website Privacy Policy

Personal data (usually referred to just as "data" below) will only be processed to the extent necessary and for the purpose of providing a functional and user-friendly website, including its contents, and the services offered there.

Per Art. 4 No. 1 of Regulation (EU) 2016/679, i.e. the General Data Protection Regulation (hereinafter referred to as the "GDPR"), "processing" refers to any operation or set of operations such as collection, recording, organization, structuring, storage, adaptation, alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment, or combination, restriction, erasure, or destruction performed on personal data, whether by automated means or not.

The following privacy policy is intended to inform in particular about the type, scope, purpose, duration, and legal basis for the processing of such data either under our own control or in conjunction with others. Also, it reflects on the third-party components that are used to optimize the PHOENIX website and improve the user experience which may result in said third parties also processing data they collect and control.

The privacy policy is structured as follows:

- I. Information about us as controllers of your data
- II. The rights of users and data subjects
- III. Information about the data processing
- IV. Third-party components

Information about PNO as controllers of your data

The party responsible for this website (the "controller") for purposes of data protection law is:

PNO Group holding B.V. (PNO Consultants B.V. / PNO) is the controller and is located at Laan van Zuid Hoorn 15, 2289 DC in Rijswijk. PNO can be contacted at +31 (0) 88-838 13 81 or by e-mail at gdpr@pno.group.

Please be aware that data transfer via the internet is subject to security risks and, therefore, complete protection against third-party access to transferred data cannot be ensured.

The privacy policy

Please notice that the subcontractor responsible for website development and maintenance (Innovation Engineering, INNEN) and PNO have in place a Data Processing Agreement under which the PHOENIX website privacy policy is regulated. The PHOENIX privacy policy will therefore be regulated as according to PNO's privacy policy as set out in Annex 2. With regard to the data processing to be described in more detail below, users and data subjects have the right

- to confirmation of whether data concerning them is being processed, information about the data being processed, further information about the nature of the data processing, and copies of the data (cf. also Art. 15 GDPR).
- to correct or complete incorrect or incomplete data (cf. also Art. 16 GDPR).
- to the immediate deletion of data concerning them (cf. also Art. 17 GDPR), or, alternatively, if further processing is necessary as stipulated in Art. 17 Para. 3 GDPR, to restrict said processing per Art. 18 GDPR.
- to receive copies of the data concerning them and/or provided by them and to have the same transmitted to other providers/controllers (cf. also Art. 20 GDPR).
- to file complaints with the supervisory authority if they believe that data concerning them is being processed by the controller in breach of data protection provisions (see also Art. 77 GDPR).

In addition, the controller is obliged to inform all recipients to whom it discloses data of any such corrections, deletions, or restrictions placed on processing the same per Art. 16, 17 Para. 1, 18 GDPR. However, this obligation does not apply if such notification is impossible or involves a disproportionate effort. Nevertheless, users have a right to information about these recipients.

Likewise, under Art. 21 GDPR, users and data subjects have the right to object to the controller's future processing of their data pursuant to Art. 6 Para. 1 lit. f) GDPR. In particular, an objection to data processing for the purpose of direct advertising is permissible.

Information about the data processing

Your data processed when using our website will be deleted or blocked as soon as the purpose for its storage ceases to apply, provided the deletion of the same is not in breach of any statutory storage obligations or unless otherwise stipulated below.

Newsletter

If you want to receive the newsletter offered on the website, we need your e-mail address and information that allows us to verify that you are the owner of the e-mail address and agree to receive the newsletter are, further data are not collected or only on a voluntary basis. We use this data exclusively for the delivery of the requested information and do not pass it on to third parties. The processing of the data entered into the newsletter registration form takes place exclusively on the basis of your consent (Art. 6 (1) lit. GDPR). The granted consent to the storage of the data, the e-mail address and their use for sending the newsletter can be revoked at any time, for example via the "unsubscribe" link in the newsletter. The legality of the already completed data processing operations remains unaffected by the revocation. The data deposited with us for the purpose of obtaining the newsletter will be saved by us from the newsletter until your cancellation and will be deleted after cancellation of the newsletter. The legal basis for this is Art. 6 Para. 1 lit. a) GDPR.

You may revoke your prior consent to receive this newsletter under Art. 7 Para. 3 GDPR with future effect. All you have to do is inform us that you are revoking your consent or click on the unsubscribe link contained in each newsletter.

MailChimp

This website uses Mailchimp for sending newsletters and PNO will be responsible of the activity. MailChimp is a service with which newsletter delivery can be organized and analysed. The data entered by you for the purpose of receiving the newsletter (e.g., e-mail address) will be stored on Wordpress.

Our newsletters sent with Mailchimp enable us to analyse the behaviour of newsletter recipients. This can u. a. analyse how many recipients have opened the newsletter message and how often which link in the newsletter was clicked. With the help of so-called conversion tracking, it can also be analysed whether a predefined action (for example, purchase of a product on our website) has taken place after clicking on the link in the newsletter.

Data processing is based on your consent (Article 6 (1) (a) GDPR). You can revoke this consent at any time by unsubscribing from the newsletter. The legality of the already completed data processing operations remains unaffected by the revocation.

If you do not want to be analysed by Mailchimp, unsubscribe from the newsletter. For this purpose, we provide a link in every newsletter message. Furthermore, you can unsubscribe from the newsletter directly on the website.

The data deposited with us for the purpose of subscribing to the newsletter is stored by us from the newsletter until it is taken out and deleted after deletion of the newsletter

both from our PNO servers and from the servers of INNEN. Data that has been stored for other purposes with us (such as e-mail addresses for the members')

Contact

On PHOENIX website, we offer you the opportunity to contact us by using a contact form. The email are addressed to the coordinator contacts. In such an event, the information provided by the user is stored for the purpose of facilitating communications with the user. No data is transferred to third parties. Nor is any of this information matched to any information that may be collected by other components of our website. The legal basis for this data processing is Art. 6 Para. 1 lit. b) GDPR.

Your data will be deleted once we have fully answered your inquiry and there is no further legal obligation to store your data, such as if an order or contract resulted therefrom.

LinkedIn

We maintain an online presence on LinkedIn to present our company and our services and to communicate with customers/prospects. LinkedIn is a service of LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085, USA.

We would like to point out that this might cause user data to be processed outside the European Union, particularly in the United States. This may increase risks for users that, for example, may make subsequent access to the user data more difficult. We also do not have access to this user data. Access is only available to LinkedIn. LinkedIn Corporation is certified under the Privacy Shield and committed to comply with European privacy standards.

<https://www.privacyshield.gov/participant?id=a2zt0000000LOUZZA0&status=Active>

The LinkedIn privacy policy can be found here:

<https://www.linkedin.com/legal/privacy-policy>.

Social Media Links Via Graphics

We also integrate the following social media sites into our website. The integration takes place via a linked graphic of the respective site. The use of these graphics stored on our servers prevents the automatic connection to the servers of these networks for their display. Only by clicking on the corresponding graphic will you be forwarded to the service of the respective social network.

Once you click, that network may record information about you and your visit to our site. It cannot be ruled out that such data will be processed in the United States.

Initially, this data includes such things as your IP address, the date and time of your visit, and the page visited. If you are logged into your user account on that network, however, the network operator might assign the information collected about your visit to our site to your account. If you interact by clicking Like, Share, etc., this information can be stored your user account and possibly posted on the respective network. To prevent this, you need to log out of your social media account before clicking on the graphic. The various social media networks also offer settings that you can configure accordingly.

The following social networks are integrated into our site by linked graphics:

Twitter

Twitter Inc., 795 Folsom St., Suite 600, San Francisco, CA 94107, USA

Privacy Policy: <https://twitter.com/privacy>

EU-US Privacy Shield:

<https://www.privacyshield.gov/%E2%80%A60000TORzAAO&status=Active>

LinkedIn

LinkedIn Ireland Unlimited Company, Wilton Plaza, Wilton Place, Dublin 2, Ireland, a subsidiary of LinkedIn Corporation, 1000 W. Maude Avenue, Sunnyvale, CA 94085 USA.

Privacy Policy: <https://www.linkedin.com/legal/privacy-policy>

EU-US Privacy Shield:

<https://www.privacyshield.gov/participant?id=a2zt00000001LOUZA0&status=Active>

Use of Google Analytics with anonymization on our website

We use Google Analytics on our website. This is a web analytics service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt00000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

The Google Analytics service is used to analyse how our website is used. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the analysis, optimization, and economic operation of our site.

Usage and user-related information, such as IP address, place, time, or frequency of your visits to our website will be transmitted to a Google server in the United States and

stored there. However, we use Google Analytics with the so-called anonymization function, whereby Google truncates the IP address within the EU or the EEA before it is transmitted to the US.

The data collected in this way is in turn used by Google to provide us with an evaluation of visits to our website and what visitors do once there. This data can also be used to provide other services related to the use of our website and of the internet in general.

Google states that it will not connect your IP address to other data. In addition, Google provides further information with regard to its data protection practices at: <https://www.google.com/intl/de/policies/privacy/partners>, including options, you can exercise to prevent such use of your data.

In addition, Google offers an opt-out add-on at:

<https://tools.google.com/dlpage/gaoptout?hl=en>

In addition to further information. This add-on can be installed on the most popular browsers and offers you further control over the data that Google collects when you visit our website. The add-on informs Google Analytics' JavaScript (ga.js) that no information about the website visit should be transmitted to Google Analytics. However, this does not prevent information from being transmitted to us or to other web analytics services we may use as detailed herein. It is also important to note, that the use of Google Analytics is not required to use our website.

Use of Google ReCAPTCHA on our website

Our website uses Google reCAPTCHA to check and prevent automated servers ("bots") from accessing and interacting with our website. This is a service provided by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland (hereinafter: Google).

Through certification according to the EU-US Privacy Shield

<https://www.privacyshield.gov/participant?id=a2zt000000001L5AAI&status=Active>

Google guarantees that it will follow the EU's data protection regulations when processing data in the United States.

This service allows Google to determine from which website your request has been sent and from which IP addresses the reCAPTCHA input box has been used. In addition to your IP address, Google may collect other information necessary to provide and guarantee this service. The legal basis is Art. 6 Para. 1 lit. f) GDPR. Our legitimate interest lies in the security of our website and in the prevention of unwanted, automated access in the form of spam or similar.

Google offers detailed information at <https://policies.google.com/privacy>.

Concerning the general handling of your user data.

Use of Slideshare

If our website employs components provided by Slideshare.com, a service of SlideShare Inc., 1 Montgomery St., Suite 1300, San Francisco, CA 94104, USA and is integrated into our site using a so-called 2-click approach. No personal data is transmitted to Slideshare.com by merely accessing our website. Personal information is transferred to Slideshare, Google Analytics and Comscore and stored in the US only when you manually activate Slideshare components. In addition, a cookie is placed on your browser. We have no control over data collected by Slideshare.com or their processing operations. Nor are we familiar with the full extent of the data collected, the purposes for which is collected or any storage periods which may be specified by Slideshare.com. Additional information is available at:

<https://www.slideshare.net/privacy>.

Annex 2. PNO's Privacy Policy

Knowledge, expertise and trust are crucial pillars of the service of PNO Consultants B.V. and the other group companies affiliated to the PNO Group holding B.V. PNO is committed to giving clarity on how we handle personal data. PNO operates under the names PNO Consultants, CiaoTech, PNO Participation, PNO Innovation, PNO GrantTools, ffigs, ttopstart, INNFLOW, Nehem, EGEN, InventiveNL, ARTTIC, ARTTIC Innovation, FZulG, InnovationPlace, Grant Assurance and AdoptIdee. In this Privacy Statement we inform about the PNO approach to handling and processing of personal data.

Contact details

PNO Group holding B.V. (PNO Consultants B.V. / PNO) is the controller and is located at Laan van Zuid Hoorn 15, 2289 DC in Rijswijk. PNO can be contacted at +31 (0) 88-838 13 81 or by e-mail at gdpr@pno.group.

Applicability of the privacy statement?

This Privacy Statement applies to all persons whose personal data PNO processes, with the exception of persons working at PNO. Personal data means any data that contains information about persons through which those persons are identifiable. This Privacy Statement applies to:

- clients of PNO,
- potential clients with whom PNO has made or wants to make contact,
- visitors to the website of PNO,
- recipients of newsletters and commercial e-mails from PNO, and
- any other person who contacts PNO or whose personal data is processed by PNO.

This Privacy Statement does not apply to employees, temporary workers, temporary workers, student trainees and applicants.

Processing of personal data

By processing personal data PNO means: collecting, recording, organising, storing, updating, modifying, retrieving, consulting, using, providing by means of forwarding, distribution or any other form of posting, bringing together, linking together, and to protect, erase or destroy personal data.

PNO processes personal data that have been provided to them, personal data generated during the visits to the PHOENIX website and reading newsletters and personal data that have derived from other sources, such as business social media platforms and business cards.

Personal information provided by users:

- contact details and other personal data needed to handle the assignment by a consultant,
- contact details and other personal data entered on contact forms or other web forms, and
- contact information provided during introductory talks, events, seminars, etc., such as information on business cards.

Personal data obtained through- or generated by websites, electronic newsletters, commercial e-mails or related technologies:

- IP number,
- surfing behaviour on the website, such as data about the first visit, previous visit and current visit, the pages viewed and the way in which the website is navigated, and
- whether users open a newsletter or commercial e-mail and on which parts they click.

See the PNO cookie statement.

Personal data obtained from other sources:

- personal data available on public business social media platforms such as LinkedIn,
- personal data obtained from the Trade Register of the Chamber of Commerce, and
- personal data available on public business websites.

The PNO and PHOENIX websites may contain hyperlinks to websites of other parties and 'social media buttons'. PNO is not responsible for the content of those websites or

the services of referred platforms. Nor is PNO responsible for the privacy policy and the use of cookies on those websites and platforms.

How PNO uses personal data

PNO uses personal data for different purposes. These are listed and elaborated on below:

- **The execution of a contract in which a client has engaged PNO for the purpose of delivering innovation and financial consulting services by our consultants.**
If a client hands over an assignment to a consultant the contact details will be requested. Other personal data may also be necessary for the handling of the assignment, depending on the nature of the assignment. Furthermore, the data is used for invoicing for the services provided.
- **Compliance with legal obligations.** Contact data are kept in EU located relationship management system and may be used for the purpose of sending newsletters, updates, invitations to events and seminars and sending information you requested from PNO.
- **Improving PNO's product and service information and carrying out targeted marketing campaigns.** Part of PNO's service is to keep people informed with information that is relevant to the clients and their business. To make this possible, PNO combines and analyses the personal data available. On that basis, PNO determines which information and channels are relevant and which moments are most suitable for providing information or establishing contact. In marketing campaigns, PNO does not process special personal data nor confidential data. If PNO would like to create a personal, individual customer profile, PNO will ask for prior permission. Withdraw of consent is always possible.

PNO analyses the following information:

- **Interaction data:** Obtain personal data and contact between PNO and the client. For example, about the use of the PNO website or supported applications. This also applies to offline interactions, such as how often and when there is contact between PNO and the client.
- **Behavioural data:** Personal data that PNO processes about the client's behaviour, such as preferences, opinions, wishes and needs. PNO can derive this data from the surfing behaviour on their website, reading their newsletters or by requesting information. But, also, through contact, incoming telephone calls and

e-mail contact with the PNO employees. Information obtained through tracking cookies, PNO collects and uses only with permission, which can always withdraw. See the PNO cookie statement [cookie-policy].

- **Performing and analysing research on client satisfaction.** Sometimes PNO asks clients to cooperate in a client satisfaction survey. This is done through an online questionnaire. Participation is voluntary. Prior to each client satisfaction survey, the client will receive further information about the working method and the way PNO deals with the information gathered.
- **Improving and securing the websites like www.heu-phoenix.eu.** The user statistics of the website enable PNO to track the number of visitors, the duration of the visit, which parts of the website are being viewed and the click-behaviour. It concerns generic reporting, without information about individuals. PNO uses the information obtained to improve the website.

Security level

PNO protects personal data through technical and administrative security measures to minimise the risk of loss, misuse, unauthorised access, disclosure and modification. One can think of security software such as a virus scanner and firewalls, a secure internet connection, encryption of data and physical and administrative access controls to data and servers. The PNO IT and HR department are ISO 27001 certified for the ffiqs processes where PNO processes large volumes of data.

Storage of personal data

PNO does not store personal data for longer than is strictly necessary for the execution of the purposes. If legal regulations apply to the storage, the personal data will not be kept longer than prescribed by law.

Legal basis of the processing

PNO processes personal data on the basis of one of the following legal grounds:

- **permission,**

on the basis of an agreement or in the run up to the conclusion of an agreement,

- **legal obligation,**

in connection with a legitimate interest.

A controller may only process personal data if this can be based on one of the limitative enumerated legal grounds in the General Data Protection Regulation (AVG). The legal bases on which PNO Consultants relies are:

- Permission: If PNO have requested permission to process personal data and permission has been given, then the person also have the right to withdraw this consent.
- Agreement or in the run up to the conclusion of an agreement: If people give PNO an assignment to provide innovation or financing consultancy services, PNO process personal data if and insofar as this is necessary for the execution of the assignment.
- Legal obligation: PNO only provides personal data to supervisors of investigative authorities if this is legally required. PNO will take measures in such cases that are reasonably necessary to ensure that personal data is protected as good as possible.
- Justified interest: PNO may also process personal data if they have a legitimate interest and do not therefore disproportionately infringe the privacy. For example, PNO uses contact information to invite people for seminars and events.

Processors

PNO may use service providers (processors) for the processing of personal data that only process personal data in PNO's order. PNO concludes a processor agreement with these processors that meets the requirements set by the General Data Protection Regulation (AVG).

For example, PNO works with service providers that offer SaaS solutions (software as a service) or provide hosting services. Furthermore, there are ICT service providers who offer PNO support in keeping their systems safe and stable. PNO also uses third-party services for sending newsletters and commercial e-mails. These are examples of parties that can be designated as (sub) processors as referred to in the General Data Protection Regulation (AVG).

Share personal data with third parties

Sometimes it is necessary to share the personal data with third parties, which – depending on the circumstances of the case – are necessary in the handling of the dossier. PNO also shares a basic set of contact details with our subsidiaries within Europe with the aim of generating consultancy opportunities. There are also legal obligations that lead to personal data being passed on to third parties.

In the following cases personal data will be provided to third parties:

- When processing a dossier, it may be necessary to share your personal data with third parties. For example, in probing or asking for funding to a government, or the conclusion of an agreement with further parties.
- If a court decision obliges PNO to provide personal data to third parties, PNO will have to comply with this.

Personal data will not be shared with third parties for commercial purposes. There is one exception to this. Sometimes PNO organises a joint activity with another organization, such as an event or seminar. In that case, only the necessary contact details are exchanged.

Personal data can also be provided to third parties, in the event of a reorganisation or merger of the company or sale of (a part of) the company.

PNO never sells personal data to third parties and do not make automated decisions that could have significant consequences for people.

Transfer outside the (European Economic Area) EEA

Under the General Data Protection Regulation (AVG), personal data may only be passed on to parties outside the EEA when an appropriate level is guaranteed for the protection of the personal data or when a specific deviation applies. PNO may pass on personal data to a party outside the EEA when necessary for the execution of the contract on provision of innovation- or financing consultancy services.

Questions about THE personal data

Every person can exercise certain rights with respect to his or her personal data on the basis of the law. This gives people the right to inspect, rectify and delete personal data. People can also object to the use of their data or request that the use is restricted. In

certain cases, they can request their data and take it to another party. For all these questions contact PNO on +31 (0) 88-838 13 81 or by email via gdpr@pno.group

Complaints

If users have complaints about how PNO handles the personal data, they can contact PNO by sending a mail to gdpr@pno.group or call +31 (0) 88-838 13 81

Changes

Developments go fast and as a result, there may also be changes in the personal data we request from the users and the way in which we use their personal data. Regulations can also change. In that case, we will update this Privacy Statement.

Last check by DPO, May 1st, 2022

Annex 3. PNO's Cookie Policy

This policy covers the use of information collected by PNO during your website visit.

Rijswijk, March 1st, 2021

What is a "cookie"?

A "cookie" is a text file containing small amounts of information which downloads to your personal computer or mobile device when you visit a website. Cookies are useful because they allow a website to recognise a user's device. You can find more information about cookies at: www.allaboutcookies.org and www.youronlinechoices.com. Various types of cookies facilitate you navigate between different pages on a website efficiently, remembering preferences you gave while visiting a website, and improving overall user experience. Others are used to provide you with advertising tailored to your interests or to measure the number of site and page visits.

Session based versus Persistent cookies

Some cookies are installed only for the duration of your visit to a website; these are called session based cookies. They automatically expire when you close your browser. Another type of cookie would remain on your device for a period of time. These are known as persistent cookies. The cookies used on this site are based on the International Chamber of Commerce guide for cookie categories:

1. Strictly necessary
2. Performance
3. Functionality

Targeting

Types of cookies PNO uses

1. Strictly necessary cookies. These cookies enable services you have specifically asked for. For those types of cookies that are strictly necessary, no consent is required. These cookies are essential in order to enable you to move around the website and use its features, such as accessing secure areas of the website. For example, these cookies will:
 - remember information you have entered on forms when you navigate to different pages in a single session, and
 - identify you as logged in to the website.

These cookies do not gather any information about you that could be used for marketing or remembering where you have been on the internet. These cookies are not used to gather information that could be used to advertise products or services to you or remember your preferences or username beyond your current visit. Accepting these cookies is a condition of using the website, so if you disable these cookies we cannot guarantee or predict how our website will perform during your visit.

2. Performance cookies collect information about how you use our website e.g., which pages you visit, and if you experience any errors. We use them only to improve our site or measure response rates. All information collected by these cookies is anonymous and does not in any way impact your privacy. We need to use them to maintain our site's effectiveness and ease of use and to improve how our website works, understand what interests our users or measure how effective certain features of our website are.

For example, we use these to provide statistics on how our website is used. We do not pass this information to anyone. We also use performance cookies to help us improve the website by measuring any errors that occur or test different designs of our website.

In some cases, some of these cookies are managed for us by third parties. Where cookies are managed by third parties, any data may be used by such third parties, but all data is collected and used in aggregated anonymised form.

Using our site indicates that you accept the use of 'Performance' cookies. Accepting these cookies is a condition of using the website, so if you prevent them we cannot guarantee how our site will perform for you.

3. Functionality cookies are used to provide services or to remember settings and choices you make to improve your experience during your visit. For example, these cookies will:
 - show you when you are logged into the website,
 - remember your login details,
 - remember the settings you have applied such as preferences,
 - remember whether we have already asked you if you want to fill in a survey, and
 - measure traffic received from various websites.

Functionality cookies collect non-identifiable data. No personal details are stored in this process and the information collected is only used in aggregate. We sometimes share some of the information with partners to provide a service on our website. In addition, some of these cookies are managed for us by third parties. In any case, the information shared or collected by third parties is only to be used to provide the service, product or function and not for any other purpose.

We will only collect functionality cookies based on your selection. If you accept the use of cookies we will store this information in a cookie named 'cookie settings'.

4. Targeting cookies are used to deliver PNO content more relevant to you and your interests. They are also used to limit the number of times you see, as well as help measure the effectiveness of, PNO marketing campaigns.

How we collect your consent

When you enter a PNO site for the first time, you will see a banner notice requesting your consent to use cookies.

[Click here to change your cookie consent](#)

This website uses cookies

We use cookies to personalise content and ads, to provide social media features and to analyse our traffic. We also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

| | | | | |
|---|--------------------------------------|-------------------------------------|------------------------------------|--|
| Use necessary cookies only | Allow selection | Allow all cookies | | |
| <input checked="" type="checkbox"/> Necessary | <input type="checkbox"/> Preferences | <input type="checkbox"/> Statistics | <input type="checkbox"/> Marketing | Show details  |

Browser settings

Cookies can also be removed from your device using browser settings but there will still be some deterioration in the service you receive (for example you may not be able to access a page you earlier personalised).

Your browser lets you choose whether to accept, not to accept or to be warned before accepting cookies. Settings can be found in the advanced preferences.

If you delete all your cookies and when you use a different device, computer profile or browser you will have to tell us your preferences again.

This policy applies to the domain pnoconsultants.com and pno.group. However other PNO websites may contain policies which are different from this one. If you visit other PNO websites please check the cookies policy of the site you visit.

We cannot be responsible for the policies and practices of other websites even if you:

- accessed the third party website using links from our website, or
- linked to our website from a third party website.

We recommend that you check the policy of each linked site you visit and contact the owner or operator of that website if you have any concerns or questions.

For more information about our policy, please contact marketing@pnoconsultants.com.

Last check by DPO, May 1st, 2022