D7.3

Ethical issues Report

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Partners short names

APRE	AGENZIA PER LA PROMOZIONE DELLA RICERCA EUROPEA
UNIFI	UNIVERSITA DEGLI STUDI DI FIRENZE
COSVIG	CONSORZIO PER LO SVILUPPO DELLE AREE GEOTERMICHE
SDU	SYDDANSK UNIVERSITET
GU	NGO GEOTHERMAL UKRAINE
SINTEF	SINTEF AS
SINTEF ER	SINTEF ENERGI AS
RIVACOLD	RIVACOLD SRL
NEO ECO	NEOECO DEVELOPPEMENT
S.M.F.	FORMAGGERIA TOSCANA S.R.L.

Abbreviations

TEU	Treaty of European Union
TFEU	Treaty on the Functioning of the European Union
GDPR	General Data Protection Regulation
AI	Artificial Intelligence
ERA	European Research Area
H&C	Heating and Cooling

Executive Summary

The present deliverable entitled “Ethical issues Report” has been developed as part of the GEOSYN project that is funded by the European Union’s Horizon Europe Research and Innovation Programme under Grant Agreement No 101172812.

This document aims to provide detailed information on the adequate technical and organisational measures that the GEOSYN Consortium puts in place to guarantee respect for the fundamental rights and freedoms of people involved in the project, both experts, such as the Advisory Board members and non-experts, such as citizens. The deliverable is focused on safeguarding rights related to personal data protection, gender equality and eventual use of the AI System in the project exploitation. This legal framework is grounded on the 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 (General Data Protection Regulation-GDPR)[1], the Regulation (EU) 2024/1689 (AI Act)[2] and the ERA Policy Agenda 2022-2024 Action 5[3].

Considering that each GEOSYN Beneficiary will be an autonomous data Controller, the present document defines the common procedures to process the personal data of participants involved in GEOSYN activities (Chapter 3) as well as common provisions that each Beneficiary respects in designing the informed consent during project execution (Chapter 4).

The Beneficiaries also adhere to the national legislation to protect the personal data rights and to confirm compliance with EU and national data protection rules.

Moreover, this report provides details about the gender equality policies that the GEOSYN Consortium applies in the implementation of the project, including the challenges of gender barriers through the dissemination and communication activities as well as the gender-balance engagement of experts in the project activities.

Finally, the Ethical Issues Policy of GEOSYN has been enriched by consideration on the AI System applications which will be considered in case the Beneficiaries should market an AI System. The project adopts the provisions of Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence (Artificial Intelligence Act) and the subsequent guidelines provided by the European Union to facilitate the application of the above-mentioned Regulation in case of commercial exploitation of an AI System.

[1] https://eur-lex.europa.eu/eli/reg/2016/679/oj
[2] https://eur-lex.europa.eu/eli/reg/2024/1689/oj/eng
[3] https://commission.europa.eu/system/files/2021-11/ec_rtd_era-policy-agenda-2021.pdf

1 Introduction

The ethical framework for the respect of European citizens' fundamental rights and freedoms, underpinning the Grant Agreement of GEOSYN, originates from the Horizon Europe Programme which itself is set up on the Treaty of European Union (TEU)[4], Treaty on the Functioning of the European Union (TFEU)[5] and Treaty of Lisbon[6], and Charter Of Fundamental Rights Of The European Union[7]. In particular, the Treaty of Lisbon law claims "[...] *respect for human dignity, freedom, democracy, equality, the rule of law and respect for human rights, including the rights of persons belonging to minorities. These values are common to the Member States in a society in which pluralism, non-discrimination, tolerance, justice, solidarity and equality between women and men prevail.*" (Art. 2 – TEU).

In accordance with Article 19 of the Horizon Europe Regulation[8] all Actions conducted under the Programme must comply with relevant national, European Union and international laws, including the Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms and its Supplementary Protocols. Moreover, "[...] *particular attention shall be paid to the principle of proportionality, to the right to privacy, the right to the protection of personal data, the right to the physical and mental integrity of a person, the right to non-discrimination and to the need to ensure protection of the environment and high levels of human health protection [...].*

The Ethics Summary Report has positively recognised the competences of GEOSYN Beneficiaries to deal with ethical issues. Consequently, the GEOSYN Beneficiaries will adhere to the Horizon Europe principles, including the GDPR provisions, together with the national acts. Recognising the diverse nature of activities across partners, the Beneficiaries act as autonomous data Controllers, assuming full responsibility for the processing of personal data within the implementation of their activities. In addition to GDPR, GEOSYN Beneficiaries guarantee the respect of EU values with a focus on Gender mainstreaming as stated in Art. 8 and 10 of TFEU and 14 and Annex V of GA.

Finally, GEOSYN considers the commitment that the European Union undertakes for the management of AI Systems and the subsequent respect of the European citizens' fundamental rights. Although the project has not developed or used AI System at the time of deliverable submission, GEOSYN commits to recognising the definition of Artificial Intelligence System under Article 3 of AI Act and the classification of the prohibited AI Systems according to Article 5 of AI Act, where necessary. Moreover, the Beneficiaries adopt the recommendations reported in the Living Guideline on the Responsible Use of Generative AI in Research[9].

[4] https://eur-lex.europa.eu/resource.html?uri=cellar:2bf140bf-a3f8-4ab2-b506-fd71826e6da6.0023.02/DOC_1&format=PDF
[5] https://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CELEX:12012E/TXT:en:PDF
[6] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A12007L%2FTXT
[7] https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:12016P/TXT
[8] https://eur-lex.europa.eu/eli/reg/2021/695/oj
[9] https://research-and-innovation.ec.europa.eu/document/download/2b6cf7e5-36ac-41cb-aab5-0d32050143dc_en?filename=ec_rtd_ai-guidelines.pdf

2 Legal basis for the data protection, gender equality and use of Artificial Intelligence in GEOSYN

2.1 Legal basis for data protection

As previously outlined, the GEOSYN ethical framework is firmly grounded on the European Union legislation, including the protection of personal data of European citizens who are engaged in the project.

Article 16 of TFEU explicitly recognises the right to the protection of personal data and the European Parliament and Council's competence to define *"[...]the rules relating to the protection of individuals with regard to the processing of personal data by Union institutions, bodies, offices and agencies, and by the Member States when carrying out activities which fall within the scope of Union law, and the rules relating to the free movement of such data [...]".*

Moreover, the Article 6 of the Treaty of Lisbon reinforces this framework by referencing the Charter of Fundamental Rights of the European Union, which also recognises the right of integrity, respect for private and family life, protection of personal data (which restricts the processing of personal data *"[...]for specified purposes and on the basis of the consent of the person concerned or some other legitimate basis laid down by law [...]"*, according to Article 8 - Charter of Fundamental Rights of the European Union) and freedom of expression and information as well as freedom of the arts and sciences.

Within the Horizon Europe framework, Article 19 disciplines the ethical rules for the participation and dissemination of the Actions implemented under the Programme. In particular, the provision reaffirms that the Actions should follow national, European Union and international laws, including the Charter and the European Convention for the Protection of Human Rights[10] and Fundamental Freedoms and its Supplementary Protocols.

Consequently, at the European level, the primary legislation to respect is the General Data Protection Regulation (GDPR). At national level, each Beneficiary is required to apply the relevant law and customary practices concerning personal data and fundamental rights, ensuring lawful implementation of activities within their respective jurisdictions.

Through this legal compliance, GEOSYN ensures the protection of European citizens' rights and reaffirms its commitment to ethical integrity in all aspects of project execution.

[10] https://www.echr.coe.int/documents/d/echr/convention_ENG

2.2 Legal basis for gender equality

The gender equality strategy implemented by GEOSYN rises from Articles 2 and 3(3) TEU, Articles 8, 10, 19 and 157 TFEU and Articles 23 of the EU Charter of Fundamental Rights. Special attention has been recognised for the art 8 of TFEU which states *"In all its activities, the Union shall aim to eliminate inequalities, and to promote equality, between men and women."* and Art. 10 of TFEU which states " *In defining and implementing its policies and activities, the Union shall aim to combat discrimination based on sex, racial or ethnic origin, religion or belief, disability, age or sexual orientation."* GEOSYN is committed to challenging any form of inequality that may arise between participants of any gender (and not only between men and women) in the implementation of activities.

The project also considers the European Commission Gender Equality Strategy 2020-2025, where the European Commission confirms its commitment to equality across all EU policies, and the ERA Policy Agenda 2022-2024 in Action 5 – *"Promote gender equality and foster inclusiveness, taking note of the Ljubljana declaration"*. Among the priority areas of common action, the declaration recognises "*particular need to better address gender-based violence in academic settings and to open gender equality policies to inclusiveness and intersections with other diversity categories and potential grounds for discrimination, such as ethnicity, disability or sexual orientation"*

The Regulation of Horizon Europe serves the European initiative as declared in Article 7 and recital 53. The recital states: "*The activities developed under the Programme should aim to eliminate gender bias and inequalities, enhancing work-life balance and promoting equality between women and men in R&I, including the principle of equal pay without discrimination based on sex, in accordance with Articles 2 and 3 of the Treaty on European Union (TEU) and Articles 8 and 157 TFEU. The gender dimension should be integrated in R&I content and followed through at all stages of the research cycle. In addition, the activities under the Programme should aim to eliminate inequalities and promote equality and diversity in all aspects of R&I with regard to age, disability, race and ethnicity, religion or belief, and sexual orientation."*

The Horizon Europe's commitment is also confirmed in the GEOSYN Grant Agreement, since in the Annex V is defined that "*The beneficiaries must take all measures to promote equal opportunities between men and women in the implementation of the action and, where applicable, in line with the gender equality plan. They must aim, to the extent possible, for a gender balance at all levels of personnel assigned to the action, including at supervisory and managerial level"*

Consequently, under the European regulations referred to above, the GEOSYN Beneficiaries have recognised their responsibility to challenge any kind of inequality associated with the gender defining a gender mainstreaming policy (Chapter 5).

2.3 Legal bases for the use of Artificial Intelligence

Although the GEOSYN hasn't developed or used an AI System yet as of the date of submission of the current deliverable (Article Articles 2.6 and 2.8), it is committed to adhering to the relevant provisions in force in the European Union, considering the eventuality where an AI-based System is needed and marketed during or after the execution of the project.

The primary legislative reference is the Regulation EU 2024/1689 (so called AI Act) which sets the definition of AI System according to Article 3: *"AI system' means a machine-based system that is designed to operate with varying levels of autonomy and that may exhibit adaptiveness after deployment, and that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that can influence physical or virtual environments"*

Moreover, Article 5 of the AI Act has identified the AI practices which are prohibited since they give rise to the most significant risks to fundamental rights and freedoms. The prohibited AI practices are summarised by ANNEX to the Communication to the Commission- Approval of the content of the draft Communication from the Commission - Commission Guidelines on prohibited artificial intelligence practices established by Regulation (EU) 2024/1689 (AI Act) [1] as follows:

- **Harmful manipulation, and deception:** AI systems that deploy subliminal techniques beyond a person's consciousness or purposefully manipulative or deceptive techniques, with the objective or with the effect of distorting behaviour, causing or reasonably likely to cause significant harm.
- **Harmful exploitation of vulnerabilities:** AI systems that exploit vulnerabilities due to age, disability or a specific social or economic situation, with the objective or with the effect of distorting behaviour, causing or reasonably likely to cause significant harm.
- **Social scoring:** AI systems that evaluate or classify natural persons or groups of persons based on social behaviour or personal or personality characteristics, with the social score leading to detrimental or unfavourable treatment when data comes from unrelated social contexts or such treatment is unjustified or disproportionate to the social behaviour.
- **Individual criminal offence risk assessment and prediction:** AI systems that assess or predict the risk of people committing a criminal offence based solely on profiling or personality traits and characteristics; except to support a human assessment based on objective and verifiable facts directly linked to a criminal activity.
- **Untargeted scraping to develop facial recognition databases:** AI systems that create or expand facial recognition databases through untargeted scraping of facial images from the internet or closed-circuit television ('CCTV') footage.
- **Emotion recognition:** AI systems that infer emotions at the workplace or in education institutions; except for medical or safety reasons.
- **Biometric categorisation**: AI systems that categorise people based on their biometric data to deduce or infer their race, political opinions, trade union membership, religious or philosophical beliefs, sex-life or sexual orientation; except for labelling or filtering of lawfully acquired biometric datasets, including in the area of law enforcement.
- **Real-time remote biometric identification (RBI):** AI systems for real-time remote biometric identification in publicly accessible spaces for the purposes of law enforcement; except if necessary for the targeted search of specific victims, the prevention of specific threats including terrorist attacks, or the search of suspects of specific offences (further

procedural requirements, including for authorisation, outlined in Article 5(2-7) AI Act).

Since the definition of AI System and the list of prohibited practices (as detailed in Article 5) came into force on 2 February 2025, GEOSYN commits to fully respect these provisions in all AI-related applications to ensure an eventual lawful marketing of GEOSYN AI systems in the European Union. Moreover, the Consortium recognises the responsibilities of all actors stated by the AI Act11, with particular attention to the roles of the provider and deployer, as well as applies the appropriate measures requested for further categories of AI System (High risk, Transparency risk, Minimal to no risk), where applicable.

Finally, Beneficiaries fully comply with the recommendations of the Living Guideline on the Responsible Use of Generative AI in Research and the key principles:

- **Reliability** in ensuring the quality of research, reflected in the design, methodology, analysis and use of resources. This includes aspects related to verifying and reproducing the information produced by the AI for research. It also involves being aware of possible equality and non-discrimination issues in relation to bias and inaccuracies.
- **Honesty** in developing, carrying out, reviewing, reporting and communicating on research transparently, fairly, thoroughly and impartially. This principle includes disclosing that generative AI has been used.
- **Respect** for colleagues, research participants, research subjects, society, ecosystems, cultural heritage and the environment. Responsible use of generative AI should consider the limitations of the technology, its environmental impact and its societal effects (bias, diversity, non-discrimination, fairness and prevention of harm). This includes the proper management of information, respect for privacy, confidentiality and intellectual property rights, and proper citation.
- **Accountability** for the research from idea to publication, for its management and organisation, for training, supervision and mentoring, and for its wider societal impacts. This includes responsibility for all output a researcher produces, underpinned by the notion of human agency and oversight.

By respecting the EU legal provisions and recommendations, GEOSYN ensures not only compliance but also contributes to setting a high standard for the responsible integration of AI technologies in EU-funded research and innovation framework while respecting the fundamental rights.

[11] https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-prohibited-artificial-intelligence-ai-practices-defined-ai-act

3 GEOSYN privacy policies

Processing on stakeholders' personal data, such as collection, recording, organisation, storage, is central in the implementation of GEOSYN activities.

The general approach is based on two types of data processing:

- Data processing of personal data related to participants in GEOSYN activities
- Data processing of personal data for website operations (e.g. newsletters)

The Beneficiaries have recognised themselves as autonomous Data controllers in participatory activities. As result, each Partner will be responsible for the data processing in the activities under its responsibility. On the other hand, APRE, as Coordinator and Task leader for the ethical issues, will always support the Consortium to set a lawful data processing, suggesting an approach like the one used in APRE's activities. The data under Beneficiaries' responsibility will be shared in specific cases and only for strictly necessary purposes.

However, all Beneficiaries have given evidence of their adherence to the principles outlined in the GDPR, as reported in the following sub-sections.

On the other hand, the data processing of personal data for website operations is under APRE's responsibility, and the relevant privacy policy has been included in Annex 1 of the current Deliverable.

3.1 Data collection, processing, storage, protection, retention and destruction for GEOSYN Activities

The data will be collected primarily during the following Tasks:

- Task 1.3 Societal impacts of geothermal heating and cooling technologies
- Task 5.1 Engaging with civil society and policy makers
- Task 5.2 Engage with industry stakeholders
- Subtask 5.2.1 Women entrepreneurship Leader
- Task 5.4 Policy Recommendations and information
- Task 6.1 Dissemination and Communication Plan and Activities, in particular concerning Project's website

Moreover, all participants in GEOSYN activities are reached through different channels such as GEOSYN social media (Zenodo, Facebook, X, LinkedIn and YouTube), individual e-mails via Beneficiaries' mailing lists, through other Beneficiaries internal channels (i.e. websites subscribers, newsletters, magazines, social media, etc.).

3.2 Data collection and data protection rights

The achievement of GEOSYN objectives requires the involvement of practitioners and quadruple helix stakeholders. Consequently, legal basis of data processing will be Article 6.1.a GDPR, requiring the consent of the data subject before any processing on the data. In exceptional cases, GEOSYN partners will process the personal date according to another legal basis; for instance whether the Partners will participate in public events, data will be processed according to Article 6.1.e.

In circumstances where informed consent cannot be filled in online (large-scale events or public events), GEOSYN beneficiaries will collect the hard-signed documents and store them in their facilities, considering their privacy policy.

All participation will be voluntary and informed. The adults are fully able and capable of providing explicit, written, freely given, specific and informed consent to take part in any GEOSYN activity and to sign the informed consent before it occurs.

In particular, the GEOSYN Consortium agreed to require the consent of adults to process at least of their first name, surname, e-mail, age, gender, country, image, audio, job position, personal website/blog/social media.

Further personal data may be collected (in mandatory or optional form), which will only be used for specific purposes.

Before taking part in the project activities, the Partners will provide participants with transparent and easily understandable information about the project, the purpose of the GEOSYN activity, and the privacy procedures as explained in the Beneficiaries' respective Privacy Policies.

3.3 Storage, protection, retention, and destruction

Data shall be safely stored at Beneficiary's local repositories, access to which is only restricted to Beneficiary's GEOSYN team members, for as long as required by the purpose they were collected and not longer than the time required by the purpose for which they were processed. Personal data of participants is only shared with the other GEOSYN Partners for specific purposes, which should be reported in the relevant privacy policy, and only after the participants have given their consent or according to another appropriate legal basis.

Once the retention period expires, personal data shall be deleted.

In relation to the data whose consent is given, the adult has the power to exercise the rights set out in Articles 15 to 21 under the GDPR. Nevertheless, it is worth noting that the data subject's rights, such as the right to access, right to erasure, right to rectification and right to data portability, cannot be enforced after the expiration of the retention period (end of the project).

All participants are made aware of their right to withdraw from the GEOSYN activities without providing any reason for their withdrawal. On the other hand, the privacy policy for GEOSYN activities informs the data subject that the data cannot be removed from documents that have already been published or are in the process of being published.

4 Informed Consent Procedures

4.1 Informed consent procedures for GEOSYN Activities

Informed consent will be sought for all activities, after informing the participants through the project privacy policy and signing a written consent form (if the consent is given during the project event) or filling in a digital form sent out to participants.

The written project information sheet provides details about the project activities, data collected, participant rights, and contact details. The consent form must be given by a competent individual who has received the necessary information; who has adequately understood the information; and who, after considering the information, has arrived at a decision without having been subjected to coercion, undue influence or inducement, or intimidation.

All obtained consents will be freely given; no pressure will be put on participants to participate in the project. All participants will be given the opportunity to ask questions and receive clear answers before making decisions about their participation. This is the second level section.

Concerning the collection of the data subject's consent for the processing on the GEOSYN Website, APRE will proceed though specific Contact forms.

Informed consent procedures of GEOSYN website are related to Newsletter and Contact forms and include:

- Clear purpose: users are clearly provided with information as to why they should fill out the forms;
- Data collected: personal data collected include Name and Surname, Professional Title/Position, Email Address, Organization Type (Academia, Industry, Government, Etc.), Country/Region Of Residence, Phone Number (If provided for Event Registration), Area Of Expertise Or Speciality, Professional Interests Related to Geothermal Energy;
- Consent statement: the forms include a checkbox which users should actively check to indicate for which activities they are giving consent for;
- Link to Privacy Policy: each checkbox provides a link redirecting to GEOSYN Privacy Policy, which in turn, provides also information on: Controller' data, Legal basis of the processing, Consent withdrawal, Recipient subjects to whom the data may be communicated, Period of retention of data, Rights of the data subject.

5 Gender mainstreaming policy

5.1 GEOSYN commitment

GEOSYN commits to recognise equal opportunities to all genders in implementation of project tasks.

The European Union as well as the Member States committed to strengthening the participation of all genders in the R&I and STEM as explained in the ERA Policy Agenda 2022-2024 Action 5.

The activities implemented in GEOSYN recognise and support this commitment promoting gender-equal educational and working engagement opportunities to the young people, in particular through the SubTask 5.2.1 Women entrepreneurship.

The aim of this SubTask is to inspire young women through female role models to study and take up careers in entrepreneurship and geothermal H&C. These role models are young female entrepreneurs that have overcome the barriers to women's entrepreneurship and can teach girls and women how to be successful in business. The consortium will organise: i) a social media campaign (with video interviews of at least three female role models), ii) at least 3 online informative sessions with a different role model each (1.5 hour) by M34 to overcome the barriers to women's entrepreneurship and can teach girls and women how to be successful in business in the geothermal H&C sectors, iii) will develop an inspiring infographic.

5.2 Promoting gender equality through an inclusive language

The aim of GEOSYN mainstreaming policy is to provide GEOSYN partners with guidance on how to achieve substantive gender equality in the implementation of project activities, in communication and dissemination actions and approaches as well as general management, ensuring that everyone can maximise their potential. The policy also includes GEOSYN good practices to help the Consortium in promoting equality and respect for diversity from a cultural, gender and inclusive point of view.

As stated by the European Institute for Gender Equality's Toolkit on Gender-sensitive Communication (2020)[12] that promotes a gender-sensitive language, "language is a reflection of the attitudes, behaviours and norms within a society. It also shapes people's attitudes as to what is 'normal' and acceptable". According to that, the European Union body strongly recommends

[12] https://eige.europa.eu/sites/default/files/documents/20193925_mh0119609enn_pdf.pdf

the use of an inclusive language, preferring a gender-sensitive language[13] to the gender-neutral language[14] when it is appropriate.

GEOSYN adheres to this recommendation by treating its participants as equal, following communication guidelines described below:

In internal and external communications, the GEOSYN Partners use a language that recognises equal dignity and respect to all genders. The only exception to this rule is when the GEOSYN Partners are not aware of the participants' gender or when it is irrelevant, where they then avoid using the gender noun or pronoun.

Questions about the participants' gender are discouraged in registration forms except when it is relevant for the analysis and monitoring of the activities. No gender-related questions are asked of minors since they are against the GEOSYN privacy policy. By making this choice, the Consortium tries not to invade the personal sphere of an individual without a reason.

Moreover, although it doesn't regard the gender, the GEOSYN Partners also prevent offences against the LGBTQ+ Community through defamatory language in the communications or implicitly affirming considerations that assume the heterosexuality as the norm. The GEOSYN Partners also specifically address issues affecting the LGBTQ+ community. This includes preventing the use of defamatory language in communications and challenging assumptions that reinforce heteronormativity as the norm.

To further challenge gender, linguistic and cultural barriers, GEOSYN decided to use English as the main communication language with its target audience, since it is recognised as the language spoken by most of them.

The promotion of the gender equity and inclusivity will be assured also through the visual representation carried out through different ways during the implementation of the project.

5.3 Promoting gender equality through project management

GEOSYN also commits to removing gender discrimination, as well as other forms of discrimination, in the management of the project as a whole and per Work Package.

The findings of the project are not foreseen to affect a specific gender, and all the outputs are expected to be non-gendered. Nevertheless, the Consortium takes into account the gender balance into the choice of events speakers and activities participants, experts, who collaborate

[13] Gender-sensitive language: Realisation of gender equality in written and spoken language attained when women and men and those who do not conform to the binary gender system are made visible and addressed in language as persons of equal value, dignity, integrity and respect. https://eige.europa.eu/publications-resources/thesaurus/terms/1354

[14] Gender-neutral language: Language that is not gender-specific and which considers people in general, with no reference to women and men. https://eige.europa.eu/publications-resources/thesaurus/terms/1352

in the implementation of the project activities, to ensure that some activities of the project unintentionally offend someone's sensitivity.

GEOSYN partners have selected the members of the Advisory Board during the preparation of the proposal taking into account the competences to be included considering the scientific and technological expertise, maintaining an inclusive approach regardless of gender dimension.

6 Conclusion

The purpose of this deliverable is to recognise the ethical principles applied to GEOSYN project and define the procedures and tools which GEOSYN adopt to respect the relevant international, European and national ethical law.

The deliverable is the result of an analysis which began during the proposal stage, when the Consortium estimated that the main commitment would concern the target audiences' data protection and the challenge of gender barriers in the research and business context.

The report will be revised and updated due to the progress of the project if necessary and the advancement of the relevant laws at the international, European and national level.

7 Annex 1: GEOSYN Website privacy policy

Privacy Information according to Articles 13 and 14 of the EU Regulation 2016/679 General Data Protection Regulation ("GDPR")

Pursuant to Article 13 of the GDPR, APRE – Agency for the Promotion of European Research, in its capacity as a data controller, informs that this regulatory compliance is intended for the site GEOSYN (www.geosynproject.eu) and forms an integral part of the website and the services we offer. APRE processes the personal data transferred to it.

Controller of the Processed Data

The data controller of the processed data is Agenzia per la Promozione della Ricerca Europea (APRE) with legal office in Rome, via Cavour 71 – 00184 Rome. Contactable at the email address: privacy@apre.it

APRE strictly observes the rules for the security of personal data and their exclusive use for the stated purpose. We conscientiously protect data from loss, misuse, unauthorised access, unauthorised disclosure, falsification, or destruction. Within our organisation, the information is accessible only to personnel authorised for data processing or to data processors expressly authorised pursuant to Article 28 of the GDPR.

Purposes of the Processing

On the GEOSYN website, users have the option of registering in our database. The input form used for this purpose determines which personal data is transmitted.

The processing of personal data by APRE is carried out for the achievement of the institutional objectives of the GEOSYN project and may have the following purposes:

1. Voluntary registration to the GEOSYN Database to be informed about our activities,
2. Participation in GEOSYN events, surveys, newsletter and workshops managed by APRE
3. Responding to requests for information about the project,
4. Fulfilling any legal obligations,
5. Statistical monitoring of website traffic
6. Any other project activities

The information and data you provide or in any case acquired as part of the use of GEOSYN services, such as, for example: subscription to the newsletter, use of information and assistance services on European programs – hereinafter referred to as "Services" – will be processed in compliance with the applicable legislation and the principles of fairness, lawfulness, transparency, and protection of your privacy and rights.

After you have browsed the GEOSYN Website, APRE will process your personal data, which may consist of a series of personal and informational data such as:

- Name and Surname
- Professional Title/Position
- Email Address
- Organization Type (Academia, Industry, Government, Etc.)
- Country/Region Of Residence
- Phone Number (If Provided For Event Registration)
- Area Of Expertise Or Speciality
- Professional Interests Related To Geothermal Energy

Moreover, other Personal Data freely provided by you for registration in our database or information request forms (for example, for registration requests for conferences and training courses) may also be processed.

Navigation Data

The IT systems and software procedures used to operate the website acquire, during their normal operation, some personal data whose transmission is implicit in the use of Internet communication protocols. These types of information are not collected to be associated with identified data subjects, but through subsequent processing, they could allow users to be identified. This category of data includes:

- Types and versions of browsers used,
- Operating system used by the access system,
- Date and time of access to the website,
- An Internet protocol address (IP address),
- The Internet service provider of the access system,

Any other similar data and information that can be used to facilitate access to our website or to identify incorrect use of our IT systems. These general data and information are necessary to allow correct access to the content of our website, optimise the content, and provide the authorities with the necessary information in case of hypothetical illegal actions against the site or third parties.

Data Voluntarily Provided

The submission of forms on the GEOSYN website, voluntary registration in the GEOSYN project database, event registration, or request for services, as well as the optional, explicit, and voluntary sending of messages to the contact addresses of the GEOSYN project, involve the acquisition of the sender's contact details, as well as all the personal data included in the communications to provide the requested services.

Data Subject Rights

In relation to the data subject's personal data, the data subject has the power to exercise the rights set out in Articles 15 to 21 under the GDPR.

In addition, consent to the storage of personal data, which the data subject has given at the time of registration, can be revoked at any time. In this case, APRE shall remove the personal data of the data subject from the place where it was published as soon as possible.

Please note that it may be impossible to remove the personal data of the person concerned if it has already been included in a document that has already been published or is currently being published.

Finally, if the right of revocation is exercised, APRE will remove the data subject's data from the Project SharePoint where it is stored.

The above rights may be exercised in writing by sending an email to geosyn@apre.it, specifying the name of the data subject and the "GEOSYN" project. The data subject also has the right to lodge a complaint with "Garante per la Protezione dei dati personali".

Recipients of Personal Data – Data Processors

Your Personal Data may be shared with the following list of entities ("Data Processors"):

1. MailUP, TeamSystem S.p.A., Via Sandro Pertini 88, 61122 Pesaro (PU) – Italy

2. Addvert S.r.l., Via Pietro Mascagni, 24, 20122 Milano (MI)- Italy

Moreover, your data subject could be transferred to Google LLC, which has its registered office in USA, for statistical monitoring of website traffic. As described in Google LLC's Data Privacy Framework certification, the Company complies with the EU-U.S. and Swiss-U.S. Data Privacy Frameworks (DPF) and the UK Extension to the EU-U.S. Find out more details here (https://policies.google.com/privacy/frameworks?hl=en-US)."

Legal basis for data processing

For the purposes set out above, the legal basis of processing is the consent you, the data subject, give to the processing of your personal data, [article 6.1.a of the GDPR]. Should you deny your consent, we will be unable to process your data.

Moreover, after the conclusion of contractual obligations with the European Union, the Controller will process the personal data for compliance with a legal obligation to which the controller is subject according to article 6.1.c of the GDPR.

Data Retention period

If the data subject does not exercise the right of withdrawal, the data will be kept in the Project Website for the time required by the purpose for which they were processed, and in any case no longer than the conclusion of contractual obligations with the European Union.

Modification of the Privacy Policy

We may periodically update our Privacy Policy, also due to changes in applicable law. Updates to our Privacy Policy will be posted on our website. As consequence, the Controllers suggest controlling frequently the privacy policy in power on the Website.

8 References

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