



## **Deliverable**

### **D1.1: Data Protection Manual**

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## 1. Introduction

This Data Protection Manual outlines the strategies and protocols for the responsible collection, storage, and use of sensitive data in the context of project goals such as renovation of family houses and buildings. This document has been created based on the Horizon 2020 FAIR Data Protection Manual (DPM) template, which is also applicable to LIFE Clean Energy Transition projects.

The LIFE **crOss renoHome** project outputs comply with the FAIR data management concept, which requires that the project data should be 'FAIR', meaning: Findable, Accessible, Interoperable, and Re-usable. These principles precede implementation choices and do not necessarily suggest any specific technology, standard, or implementation-solution. The DPM is not intended as a strict technical implementation of the FAIR principles; it is inspired by FAIR as a general concept.

The LIFE **crOss renoHome** project aims to gather information at local level, and even at household level, including personal details such as names, ages, professions, education levels, income, energy bill expenses, and addresses, from individuals who wish to renovate their homes. The collection and handling of such data demands meticulous attention to privacy, security, and ethical considerations to ensure compliance with relevant regulations and safeguard the rights of participants.

The overarching goal of this DPM is to establish robust procedures that facilitate the ethical and efficient management of sensitive data. These protocols will not only encompass data collection but will also address storage, access, sharing, and eventual disposal, prioritizing transparency, and confidentiality throughout the project's lifecycle. This plan serves as a guideline for project personnel, emphasizing the importance of respecting individual privacy rights.

## 2. Data Summary

Regarding data collection, the LIFE **crOss renoHome** project will gather diverse data types, including demographic information (such as names, ages, professions, education levels), financial details (income, expenses on energy bills), and residential data (addresses).

In this context, the European General Data Protection Regulation (Directive 95/46/EC) mentions that the most sensitive data to be considered is:

- personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs,

- trade union membership,
- genetic data, biometric data processed solely for the purpose of identifying a human being,
- data concerning health,
- data concerning a person's sex life or sexual orientation.

Therefore, the LIFE **crOss renoHome** project will not use this type of data, as they are not considered decisive for the type of assessment to be carried out.

The project data will primarily be collected in digital formats through standardized contract and consultation in the office, and Marketplace on the project's webpage. Data will be mainly processed in XLSX, CSV, PDF, or Word DOCX formats to ensure compatibility with as much software as possible.

The data will be aggregated so that anonymity is ensured. The knowledge derived from the data will allow us to provide the best possible service for each individual case.

Finally, the ethical handling and careful analysis of this data will be imperative. In this regard, we have identified three main categories of datasets that will be produced during the implementation of the LIFE **crOss renoHome** project.

## **2.1 Data protection and handling related to the standardized contract**

Within Work Package 2 (Comprehensive toolkit for renovation), structured and standardised contracts to facilitate a family house and multiapartment building renovation processes in all aspects will be created. Standardised contracts must be acceptable and do no harm to both investors and service providers. To achieve this, data protection and handling received from investors who will ask for a renovation service must be secured. Standardised contracts will be publicly accessible through the online Marketplace, and they will be available to download within the platform. Data given by the investors will be stored in accordance with national data protection requirements and it will be ensured that no identifiable information will be stored longer than required. Furthermore, all data received by investors will be handled according to GDPR key principles.

## **2.2 Data protection on Marketplace and crOss renoHome webpage**

The Marketplace within **crOss renoHome** project will be developed as a comprehensive tool for target users, and a central point of expertise and organizational innovation needed for project development. The development of the Marketplace will connect service providers, financial institutions, and citizens. For the development of the

Marketplace platform a database of contacts will be established. The database will be used to collect and contact all relevant stakeholders that could provide general input on enriching already compiled data in previous activities and support the online tool development by being part of the general online database. The personal information of stakeholders will not be shared under any circumstance and will only be kept for organisational purpose. This information won't be shared with any member of the **crOss renoHome** consortium.

Since the Marketplace will be an online tool, internet data protection rules will be applied to both service providers and the users. Every user must consent to data processing and should be able to withdraw the consent for the use of personal data. Every user must be able to correct their personal data or delete them. Furthermore, every user's data must be protected from unauthorized access. Finally, every user has a right to file a complaint.

Another topic that must be addressed are "cookies". Cookies are small text files that a website stores on a computer or mobile device through internet browser. Cookies are used everywhere to save the user's preferences so that websites work more efficiently. They are also used to track internet usage and create user profiles, and then to display customized online ads based on user's personal preferences. Any website that wants to use cookies must obtain a consent before placing cookies on the user's computer or mobile device. Websites must explain to the user how data from cookies will be used. A user should be able to withdraw their consent. If a user decides to do so, the website must still provide them with the minimum possible service, for example providing them with access to part of the site.

### **2.3 Protection and handling of data of citizens who will come to the OSS office**

OSS aims to provide advice and technical and administrative support to homeowners to empower them in the process of the renovation. Energy advisors in the OSS will help in data gathering and project documentation preparation. The OSS will also showcase the examples of technologies such as PV panes, solar collectors, heat pumps, examples of new building materials and technologies. It will closely follow the new processes in building sector, new calls and opportunities, financial instruments, and legal framework for renovation.

Visitors of the OSS office who are potential investors will also be required to give their personal data to the service provider representative. Their data will be handled according to the Agreement in compliance with the applicable EU, international and national law on data protection.

All personal data received will be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject.
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed
- accurate and, where necessary, kept up to date
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed
- processed in a manner that ensures appropriate security of the personal data.

### **3. FAIR Data**

#### **3.1 Making data findable, including provisions for metadata**

The data produced and utilized within the project will be structured to ensure discoverability and traceability through standardized identification mechanisms. Document filenames are kept short to avoid unnecessarily long paths, always include the last partner to edit the document, and a version indicator. All project documentation is stored in a dedicated SharePoint that will enable full control over editing permissions of project participants. No metadata is expected to be generated.

#### **3.2 Making data openly accessible**

The final data, deliverables, and project documentation to support published outcomes are deposited in a dedicated repository that the data management responsible person has established. In situations where there are restrictions on the use of the data, access will be granted under conditions set out in specific licences of use. Identification verification protocols will be implemented for those accessing the data, using secure authentication methods. This strategy seeks to balance open access with necessary restrictions, ensuring secure and facilitated access to valuable data and complying with legal, ethical, and contractual obligations.

### 3.3 Making data interoperable

The data produced in this project will be structured to ensure high levels of interoperability, allowing exchange and re-use across project partners. We prioritize adherence to established standards for data formats and compatibility with available

project, all partners will collect and generate data for a successful implementation. Nevertheless, no large volumes of data and metadata are expected. The generated and collected data is included in the project deliverables and reports. To ensure good interoperability, XLSX, CSV, PDF or Word DOCX formats will be used. The public deliverables and other relevant project results will be accessible on the project's official website.

### 3.4 Increase data re-use (through clarifying licenses)

During the project implementation, the data quality assurance process is organised by EV, the partner responsible for data management who searches for inconsistencies and other anomalies in the data and the project SharePoint folder. After project implementation, EV will ensure that the relevant public data is available for 5 years. In the repository which will contain this information, licenses and access conditions will be established.

## 4. Data security

### 4.1 Data usage by project partners and stakeholders

*Technical Partners:*

The LIFE **crOss renoHome** technical partners may need access to specific datasets essential for collaborative actions. This access will always be framed on the project's requirements, ensuring that pertinent data is available for mutual benefit. Any sensitive information shared with technical partners will be handled under strict confidentiality protocols.

*Stakeholders:*

Stakeholders will primarily interact with aggregated datasets to obtain project information or assess its results. It is imperative to note that stakeholders will not have access to sensitive or individualized information. The dissemination of data to stakeholders will be organised to present aggregated findings that maintain anonymity and confidentiality of sensitive information.



## 4.2 Data security policies in LIFE crOss renoHome Project

Access to project documentation and data is only available to those who have access to the project's SharePoint. This access is determined by the Project Coordinator.

All LIFE **crOss renoHome** data is collected, stored, protected, and shared, upholding security measures and in full compliance with relevant EU legislation. This data is not disclosed to anyone outside the research team until the data has been finalised for publication and approved for release by the project consortium.

All the project relevant data will be stored for at least 5 years after the end of the project. This will ensure that funder, institutional or publisher retention compliance is satisfied, as is the authenticity of the original data for open data requirements or post research review if necessary.

## 4.3 Data Anonymization

The aim of data anonymization is that personal data could not be identified or attributed to a natural person without the use of additional information. In the case of the project activities, data anonymization takes part when it is requested by the participant, and when it is necessary for the results of the activities to be reliable.

## 5. Ethical aspects

Ethical and legal considerations play a pivotal role in data sharing, especially concerning the sensitive nature of personal data related to individuals. The impact of these considerations on data sharing revolves around ensuring compliance with privacy regulations and ethical standards.

Any personal data gathering within the project conformed to informed consent expectations that are expected regarding current Data Protection legislation, and the EU General Data Protection Regulation (GDPR) that started to implement on 25th May 2018.

In the questionnaires dealing with personal data, explicit provisions for informed consent regarding data sharing and long-term preservation have been included. Participants are informed about the project's data sharing policies, including the anonymization and aggregation processes for protecting their identities. This informed consent ensures that participants are fully aware of how their data will be shared and preserved, granting them the opportunity to provide or withhold consent for these purposes.

By incorporating informed consent mechanisms into the questionnaires and addressing ethical and legal concerns within the project's framework, we aim to ensure that data sharing practices adhere to rigorous ethical standards. If during participatory activities personal data or photos are taken, consent forms are produced for participants. The consent forms are adapted to the specific activities and national context. When written informed consent was not proportionated to the participants, verbal consent was solicited, and anonymization of the data was carried out when requested.

All the ethics issues are treated in the Steering Committee meetings, including data management ones.



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Croatian One Stop Shop for Integrated Home Renovation

