



ERATOSTHENES

Secure management of IoT devices lifecycle through identities, trust and distributed ledgers

D8.2: H - Requirement No. 2

Document Summary Information

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Responsible author	DBC	Lead Beneficiary	DBC
Authors	George Athanasiou, Sara Nabaraoui (DBC)		
Internal reviewers	Song Hui (SINTEF)		



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Revision history (including peer reviewing & quality control)

Version	Issue Date	% Complete	Changes	Contributor(s)
V1	20/05/2022	40%	Initial Deliverable Structure & Basic Processes.	George Athanasiou, Sara Nabaraoui (DBC)
V2	25/06/2022	70%	Collection of opinions from the Ethics Committees	George Athanasiou, Sara Nabaraoui (DBC)
V3	06/07/2022	100%	Final version and Quality Review	George Athanasiou, Sara Nabaraoui (DBC), Song Hui (SINTEF)

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1 Executive summary

ERATOSTHENES H - Requirement No. 2 document responds to the first “ethics requirement” by the European Commission by analysing how consent and data collection will be handled within the project. This is regarded as work performed in WP8 (Ethics Requirements) and this report is the first deliverable on requirement No 2. In particular, copies of opinions/approvals by ethics committees on the research with humans are reported.

This deliverable complements the reports D8.1 and D8.3 that included respectively, the first “ethics requirement” by the European Commission by analysing how consent and data collection will be handled within the project, and the details of the Data Protection Officers (DPOs) of the beneficiaries.

2 Introduction

2.1 Mapping ERATOSTHENES outputs

The purpose of this section is to map ERATOSTHENES Grant Agreement (GA) commitments, both within the formal Deliverable and Task description, against the project's respective outputs and work performed.

Table 1: Adherence to ERATOSTHENES GA Deliverable & Tasks Descriptions

ERATOSTHENES GA Component Title	ERATOSTHENES GA Component Outline	Respective Document Chapter(s)	Justification
DELIVERABLE			
D8.2 H - Requirement No. 2	D8.1 will include: <ul style="list-style-type: none"> Copies of opinions/approvals by ethics committees for the research with humans. 	1-4	<i>The current report responds to the second 'ethics requirement' received from the European Commission.</i>
WP/TASKS			
WP8	This work package sets out the 'ethics requirements' that the project must comply with.	1-4	<i>Chapters 1-4 include: Copies of opinions/approvals by ethics committees and/or competent authorities for the research with humans</i>

2.2 Deliverable overview and report structure

The present report is structured around 2 Sections as follows:

- Section 1: Executive summary of the deliverable.
- Section 2: Introduction and general overview of the requirements of the deliverable in comparison to what is mentioned in the Grant Agreement.
- Section 3: Copies of opinions/approvals by ethics committees for the research with humans.
- Section 4: Conclusions.

3 Copies of opinions/approvals by ethics committees for the research with humans

In what follows, the opinions of the ethics committees of the organisations that are part of the ERATOSTHENES project are presented. It is clearly stated that ERATOSTHENES is a pure ICT/Cybersecurity project involving no humans in the research activities.

This is in agreement with the consortium and project coordination team's decision that the project overall does not include any research that could involve human data. Nonetheless, the ethics committees of ERATOSTHENES partners, together with the project coordination team, will be constantly monitoring the project activities to ensure that ethics requirements are checked and will revert to their management in case further issues arise at any project stage.

1. INLECOM INNOVATION ASTIKI MI KERDOSKOPIKI ETAIREIA (INLE)

From: Makis Kouloumbis <gerasimos.kouloumbis@inlecomsystems.com>
Date: Thursday, 23 June 2022 - 11:37 AM
To: George Athanasiou <gathanasiou@diadikasia.gr>
Cc: Konstantinos Loupos <konstantinos.loupos@inlecomsystems.com>
Subject: Re: ERATOSTHENES - D8.2

Dear George,

Thank you for your effort in this task and the content for D8.2 report. As the INLECOM INNOVATION assigned DPO for the ERATOSTHENES project, I would like to confirm that our tasks in the project mainly relating to the development of the Trust computation, Trust Agents and Recovery (WP2), DLT development for IoT identity management (WP3) and DLT-based Trust Framework, Trust network Smart Contracts (WP4) do not involve any processing of personal data or any research relating to humans.

I remain available in case you need any further information from the INLECOM side.

Best regards,

Makis Kouloumbis

2. UNIVERSIDAD DE MURCIA (UMU)

From: Antonio Skarmeta <skarmeta@um.es>
Date: Monday, 27 June 2022 - 7:57 PM
To: George Athanasiou <gathanasiou@diadikasia.gr>
Cc: Sara Nabaraoui <snabaraoui@diadikasia.gr>, Anastasia Panousi <apanousi@diadikasia.gr>
Subject: Re: ERATOSTHENES - D8.2

Dear George

Just forward you the message just received from our DPO

Buenos días.

En relación con el tratamiento de datos descrito en el cuestionario adjunto, mi opinión es favorable. Dado que afirma que no se recogerá datos identificativos, la información será anónima, es decir, no será posible identificar a los participantes. No obstante, le recomiendo que se cerciore de que mediante la combinación de los datos consignados en los cuestionarios no permiten la identificación indirecta de los participantes.

----- Google translation

In relation to the data processing described in the attached questionnaire, my opinion is favourable. Since it states that no identifying data will be collected, the information will be anonymous, that is, it will not be possible to identify the participants. However, I recommend that you make sure that by combining the data recorded in the questionnaires they do not allow the indirect identification of the participants.

3. ATOS IT SOLUTIONS AND SERVICES IBERIA SL (ATOS)

From: Piñuela Marcos, Ana Maria <ana.pinuela@atos.net>
Date: Thursday, 23 June 2022 - 9:34 AM
To: George Athanasiou <gathanasiou@diadikasia.gr>, konstantinos.loupos@inlecomsystems.com <konstantinos.loupos@inlecomsystems.com>
Cc: Crespo, Alberto <alberto.crespo@atos.net>, Palomares Perez, Angel <angel.palomares@atos.net>
Subject: ERATOSTHENES: D8.2 (ethics requirement No 2)

Dear all,

To the attention of:

Konstantinos Loupos, INLECOM INNOVATION, Project Coordinator
George Athanasiou, Diadikasia, Ethics Coordinator

Reference: ERATOSTHENES: Secure management of IoT devices lifecycle through identities, trust and distributed Ledgers (Grant Agreement Number 101020416).

In regard to your request for input to the project deliverable D8.2: H - Requirement No. 2 with the described content “Copies of opinions/approvals by ethics committees and/or competent authorities for the research with humans must be obtained and kept on file”, we provide the following information.

ATOS IT SOLUTIONS AND SERVICES IBERIA SL (ATOS IT) has the role of *partner*. Atos IT is Technical Coordinator and leader of WP3 Decentralized Identity Management. In addition, Atos IT contributes to various tasks across workpackages.

Research with humans: In the course of these activities mentioned above, ATOS IT does not conduct research with humans or treat any personal data. For this reason there is no approval or disapproval from the DPO for these activities which do not concern the ambit of emitting an approval or an opinion. There is however a rigorous internal process for controlling and identifying the use of personal data for the project ERATOTHENES which monitors the use of human and personal data in all Atos projects. This process has concluded that Atos IT does not carry out activities of handling / collecting / processing etc. of personal / human data in the project. This internal process is carried out on an annual basis to control for any modification of activities.

Kind regards,

Ana Piñuela



Ana María Piñuela Marcos
Digital Security & Computer Vision Area Manager
Atos Research & Innovation
BDS Global Strategy & Innovation

M: +34 (0) 675628169
Albarracín 25, 28037 Madrid – Spain
[atos](#)

[.net](#)



4. SINTEF AS (SINTEF)

From: Lasse Andre Raa <lasse.raa@sikt.no>
Sent: Thursday, June 30, 2022 11:15
To: Konstantinos Loupos <konstantinos.loupos@inlecomsystems.com>
Cc: Hui Song <hui.song@sintef.no>
Subject: Confirmation from SINTEF DPO regarding ERATOSTHENES project

Dear Konstantinos Loupos,

Referring to the email below, I am contacting you as project coordinator for ERATOSTHENES. I am SINTEF's DPO through Sikt – Norwegian Agency for Shared Services in Education and Research.

I confirm that as I understand the project, SINTEF will not register personal data on data subjects. Should this change, and the need for processing of personal data arise, SINTEF has arrangements in place to assess legal grounds for processing by notifying Sikt.

Let me know if anything is unclear or if you need more information.

Best regards,

Lasse Raa
Senior advisor, Section for Data Protection Services

Phone: (+47) 53 21 15 45

Sikt – Norwegian Agency for Shared Services in Education and Research

5. AIRBUS CYBERSECURITY SAS (AIRBUS)

From: Thomas Oudin <thomas.oudin@airbus.com>

Date: Tuesday, 5 July 2022 - 11:37 AM

To: Konstantinos Loupos <konstantinos.loupos@inlecomsystems.com>

Cc: paul-emmanuel.brun <paul-emmanuel.brun@airbus.com>, marco.lobe-kome <marco.lobe-kome@airbus.com>, Sara Nabaraoui <snabaraoui@diadikasia.gr>, Anastasia Panousi <apanousi@diadikasia.gr>, George Athanasiou <gathanasiou@diadikasia.gr>

Subject: Re: ERATOSTHENES - D8.2

Dear Konstantinos,

In ACS our research activities within ERATOSTHENES do not involve research with humans.

Best Regards

Thomas

6. ENGINEERING - INGEGNERIA INFORMATICA SPA (ENG)

From: Ioana Cristina Lupo Cotoi <IoanaCristina.Cotoi@eng.it>
Date: Tuesday, 28 June 2022 - 12:33 PM
To: George Athanasiou <gathanasiou@diadikasia.gr>
Cc: Francesca Giampaolo <Francesca.Giampaolo@eng.it>
Subject: Re: ERATOSTHENES - D8.2

Dear George,

On behalf of ENG I confirm you that our organization does not process personal data and does not involve humans for the performance of the activities foreseen in ERATOSTHENES; for this reason no approval is needed from any ethics committee or DPO of ENG. Therefore, Ethics Requirement No.2 does not apply to us.

Best regards,

Ioana Cristina Cotoi

Engineering Ingegneria Informatica
Research and Innovation Labs - Security Programmes
Skype: cotoi.ioana
Office: +39 08321975113
Mobile: +39 3701255188



7. KATHOLIEKE UNIVERSITEIT LEUVEN (KUL)

From: Toon Boon <toon.boon@kuleuven.be>

Date: Monday, 20 June 2022 - 4:54 PM

To: George Athanasiou <gathanasiou@diadikasia.gr>

Cc: Dimitri Van Landuyt <dimitri.vanlanduyt@kuleuven.be>, Katrien Janssens <katrien.janssens@kuleuven.be>, Danny Hughes <danny.hughes@kuleuven.be>, Marijke Nicolai <marijke.nicolai@kuleuven.be>, Sam Michiels <sam.michiels@kuleuven.be>

Subject: RE: [ERATOSTHENES] verwerking Ethics Summary Report -> Humans & research?

Dear Mister Athanasiou

(Please also forward this message to the project coordinator as I do not have his mail address)

After careful reading of all the project documents and consultation with the researchers involved on our behalf I can confirm :

- a) that KU Leuven will not do research ON humans;
- b) that in principle KU Leuven will not receive any personal data unless carefully anonymized or at least pseudonymized by our partners and that it does not collect any personal data itself. The data management plan clearly guarantees further more that KU Leuven will treat all data under such technical and organizational circumstances to prevent data from being seen by anyone but the researchers themselves.

Best regards

Toon Boon

Data protection officer KU Leuven

Krakenstraat 3 bus 5516, lokaal 01.16 | 3000 Leuven | België

Tel + 32 (0)16 32 40 74 | Fax +32 (0)16 32 41 67

8. TECHNISCHE UNIVERSITAET GRAZ (TUG)


Subject: Assessment of ethical acceptability, Project Eratosthenes

In consideration of the description of work and description of planned activities of the Eratosthenes Horizon2020 project, the project consortium is not planning to perform any research with humans nor is it intended that personal data used in research activities.

Therefore, approval from the Commission for Scientific Integrity and Ethics of Graz University of Technology is not required.

Kind regards,

Arne Tauber (head of research group, Eratosthenes lead for Graz University of Technology)

	Signatory	Arne Tauber
	Date/Time-UTC	2022-06-30T11:32:56+02:00
	Verification	Information about the verification of the electronic signature can be found at: https://www.signaturpruefung.gv.at
Note	This document is signed with a qualified electronic signature. According to Art. 25 para. 2 of the Regulation (EU) No 910/2014 of 23. July 2014 ("eIDAS-Regulation") it shall have the equivalent legal effect of a handwritten signature.	

9. UNIVERSITY OF PIRAEUS RESEARCH CENTER (UPRC)

ΠΑΝΕΠΙΣΤΗΜΙΟ ΠΕΙΡΑΙΩΣ
ΤΜΗΜΑ ΨΗΦΙΑΚΩΝ ΣΥΣΤΗΜΑΤΩΝ



UNIVERSITY OF PIRAEUS
DEPARTMENT OF DIGITAL SYSTEMS

Piraeus, 20/06/2022

To whom it may concern:

Within the scope of ERATOSTHENES project (G.A. 101020416), UPRC research activities do not involve research with humans, and do not require the collection/processing/storage of personal or otherwise identifiable data.

Minas Vartanian, Data Protection Officer

University of Piraeus Research Centre

ΚΑΡΑΟΛΗ & ΔΗΜΗΤΡΙΟΥ 80
185 34 ΠΕΙΡΑΙΑΣ

TEL: 210.4142751-2
www.ds.unipi.gr

80, KARAOLI & DIMITRIOU STR.
185 34 PIRAEUS - GREECE

10. IDIADA AUTOMOTIVE TECHNOLOGY SA (IDIADA)

From: data_protection <data_protection@idiada.com>

Date: Wednesday, 29 June 2022 - 11:17 AM

To: George Athanasiou <gathanasiou@diadikasia.gr>, konstantinos.loupos@inlecomsystems.com <konstantinos.loupos@inlecomsystems.com>

Cc: Manel Rodriguez <Manel.Rodriguez@idiada.com>, Alejandro Manilla <Alejandro.Manilla@idiada.com>

Subject: Data protection information - ERATOSTHENES project

Dear colleagues,

Regarding your request, I am writing this e-mail to confirm that, within the framework of the ERATOSTHENES project, IDIADA does not and will not research with humans and use personal data during its participation in the tasks which it is part in the project.

For your information, the main contribution of IDIADA to the ERATOSTHENES project, it is in Pilot 1 from WP5 which intends to test the project results in two automotive use cases. Nevertheless, IDIADA also have presence in other tasks during the development/research phase such as the end-user requirements specification and the architecture design. In addition, IDIADA participates in WP3 during task 3.1 and 3.2, and in WP4 regarding the development of federated threat analysis models for continuous assessment.

Please note that the confirmation of this email is based on the current framework of the ERATOSTHENES project. In the event that the framework or purpose of the ERATOSTHENES project plan changes, IDIADA will have to re-evaluate whether it will need to carry out research with humans and use personal data for the implementation of the project.

Finally, we would like to inform you that this e-mail address is the general address regarding data protection matters, therefore, please do not hesitate to contact us if you need clarification and/or further information in this regard.

Kind regards,

Albert Vives Miret

CSO/DPO

T: +34 977 166 029

E: Albert.Vives@idiada.com

www.idiada.com

11. DIGITAL WORX GMBH (DWG)

From: rohit <r.bohara@digital-worx.de>

Date: Monday, 27 June 2022 - 7:08 PM

To: George Athanasiou <gathanasiou@diadikasia.gr>

Cc: Konstantinos Loupos <konstantinos.loupos@inlecomsystems.com>, Mirko Ross <m.ross@asvin.io>

Subject: [ERATOSTHENES] D8.2

Hi George,

It is Rohit Bohara from digital worx GmbH (DWG).

I confirm that, in ERATOSTHENES we are not doing research with humans. We are not using personal data in our research activities, as done for example in EC project in the Health domain (clinical trials, etc).

Our research activities within ERATOSTHENES do not involve research with humans.

Regards,
Rohit Bohara

12. TELLU IOT AS (TEL)

From: Arnor Solberg <arnor.solberg@tellu.no>

Date: Thursday, 23 June 2022 - 12:15 PM

To: George Athanasiou <gathanasiou@diadikasia.gr>, Konstantinos Loupos
<konstantinos.loupos@inlecomsystems.com>

Cc: Sara Nabaraoui <snabaraoui@diadikasia.gr>, Anastasia Panousi <apanousi@diadikasia.gr>, Liubov Kokorina
<Liubov.Kokorina@tellu.no>

Subject: RE: ERATOSTHENES - D8.2

Dear George and Costas

We hereby confirm that your research activities within ERATOSTHENES do not involve research with humans.

Best regards

Tellu v/Arnor (CDO) and Liubov Kokorina (CISO, PDO)

13. EULAMBIA ADVANCED TECHNOLOGIES MONOPROSOPI ETAIRIA PERIORISMENIS EFTHINIS (EUL)

From: john.syvridis@eulambia.com <john.syvridis@eulambia.com>
Date: Thursday, 23 June 2022 - 4:14 PM
To: George Athanasiou <gathanasiou@diadikasia.gr>
Cc: konstantinos.loupos@inlecomsystems.com <konstantinos.loupos@inlecomsystems.com>
Subject: ERATOSTHENES D8.2

Dear George,

On behalf of EULAMBIA LTd., I confirm that in the ERATOSTHENES EU project we are not doing research with humans. We are not using personal data in our research activities, as done for example in EC project in the Health domain (clinical trials, etc).

Sincerely,

John Syvridis,
Managing Director
EULAMBIA Ltd.

14. DBC EUROPE (DBC)

From: Sara Nabaraoui <snabaraoui@diadikasia.gr>

Date: Thursday, 22 June 2022 - 12:46 PM

To: George Athanasiou <gathanasiou@diadikasia.gr>, Konstantinos Loupos <konstantinos.loupos@inlecomsystems.com>

Subject: RE: ERATOSTHENES - D8.2

Dear colleagues,

We hereby confirm that our research activities within ERATOSTHENES do not involve research with humans.

Best regards,

Sara Nabaraoui

4 Conclusions

The present deliverable is the third document responding to the “ethics requirements” (relating to ERATOSTHENES WP8 activities) by the European Commission. It reported the opinions/approvals by ethics committees for the research with humans.

As a conclusion to the content of this report and following the ethics responsible (DPOs) per partner, it is evident that none of the partners’ activities involves any relation to research with humans. However, the ethics responsible partner together with the project coordination team will be constantly monitoring the project activities to ensure that ethics requirements are checked and will revert to their management in case further issues arise at any project stage.