

# D9.1 OEI Requirement No.1



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Author(s)/ Organisation(s)	Dusan Pavlovic (PN) Aayushi Gupa (PN), Djordje Djokic (PN), Attila Wootsch (PN), Cristina Hilario (TID), Jordi Luque (TID), Ines De Ibarguen (TID), Javier Garcia (TID)			
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### **ELOQUENCE Consortium**

Participant No.	Participant organisation name	Short name	Country	Role*
1	TELEFONICA INNOVACION DIGITAL SL	TID	ES	CO0
2	CONSIGLIO NAZIONALE DELLE RICERCHE	CNR	IT	BEN
3	BARCELONA SUPERCOMPUTING CENTER CENTRO NACIONAL DE SUPERCOMPUTACION	BSC	ES	BEN
4	FONDAZIONE BRUNO KESSLER	FBK	IT	BEN
5	UNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKA	UNS	RS	BEN
6	EUROPEAN UNIVERSITY INSTITUTE	EUI	IT	BEN (IO)
7	VYSOKE UCENI TECHNICKE V BRNE	BUT	CZ	BEN
8	PRIVANOVA SAS	PN	SAS	BEN
9	INOSENS DOO NOVI SAD	INO	RS	BEN
10	TRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.O.	TL	SI	BEN
11	GRANTXPERT CONSULTING LIMITED	GX	CY	BEN
12	OMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EFTHYNIS PAROXIS PLIROFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPIRESION KAI SYSTIMATON	ОМ	EL	BEN
13	SYNELIXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIA	SYN	EL	BEN
14	FONDATION DE L'INSTITUT DE RECHERCHE IDIAP	IDIAP	СН	AP
15	BRUNEL UNIVERSITY LONDON	BUL	UK	AP
16	UNIVERSITY OF ESSEX	UESSEX	UK	AP

Role: COO-Coordinator; BEN-Beneficiary; AE-Affiliated Entity; AP-Associated Partner

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ABBREVIATIONS	AND ACRONYMS
AI	Artificial Intelligence
DPIA	Data Protection Impact Assessment
DPO	Data Protection Officer
EAB	Ethics Advisory Board
EU	European Union
GDPR	General Data Protection Regulation
GA	Grant Agreement
NDA	Non-disclosure Agreement
PC	Project Coordinator
PN	Legal/Ethics Manager
WP	Work Package



# 1 Introduction

# 1.1 Purpose and scope

Ethics are given the highest priority in research and development projects funded by the European Union (EU). Therefore, ELOQUENCE activities are carried out in accordance with national legal and ethical requirements as well as the ethical standards and rules of the Horizon Europe guidelines. To this end, the participation of individuals in the research activities will be organized in a way that meets the highest ethics standards. The handling of data within the project is subject to EU data protection laws, including Regulation (EU) 2016/679 of the European Parliament and of the Council, General Data Protection Regulation (GDPR) of the European Union (EU). The involvement of partners based outside the EU will entail minimal potential risks, while any adverse environmental, health, and safety impacts have been assessed and will be adequately addressed in the further project implementation. Finally, the development of Artificial Intelligence (AI) will be in accordance with the relevant guidelines and principles. In order to strengthen compliance with ethical principles, as an independent dimension of the project implementation, an independent Ethics Advisory Board (EAB) will be established.

The present deliverable follows the specific ethics requirements raised by the ethics evaluators in relation to the identified ethics areas. It serves as a comprehensive plan highlighting the ethical discourse that will be implemented in the project's research activities. Overall, this document aims to fulfill the post-grant requirements outlined in the Grant Agreement (GA) and improve the project's adherence to ethical principles. It also serves as evidence of the proactive approach and demonstrates the translation of the ethical and legal principles into concrete, pragmatic actions. One of the main purposes of this document is to describe the strategies, tactics, and concrete measures that have been meticulously integrated during the course of the project implementation. Finally, this document contains a forward-looking perspective, as it provides a roadmap with plans to maintain and strengthen ethical compliance in the project implementation.

# 1.2 Contribution to other work packages and tasks

This deliverable complements many other deliverables as well as tasks within many work packages (WP). It should be considered as the basis for the entire project implementation. In the context of invasive and research projects, such as ELOQUENCE, ethics has a transversal character and concerns several ethics areas as identified in the ethics appraisal schema. Therefore, the application of this outcome is prevalent in most project activities and plays a crucial role in overall project management.

Several WPs include tasks based on data processing. In this context, the ethics framework is closely linked to the data management plan and the appropriate use of data for research, dissemination, and exploitation activities carried out in the course of project implementation.

The development of technical solutions is planned in later phases of the project development. The legal and ethical framework is a cornerstone for the appropriate development and successful implementation of specific WPs, such as WP4, which is the cornerstone for the development and implementation of the project's use cases. The implementation of the legal and ethical requirements will be monitored by the EAB. The formation and work of this body is anchored by specific tasks within WP6. One of the main objectives of WP6 is also to monitor compliance with legal and ethics requirements, including the implementation of this framework in practice. Therefore, the contribution of this deliverable is of utmost importance for the outcomes associated with WP6.

# 1.3 The structure of the deliverable

This deliverable consists of nine sections. After the introduction, the document describes the ethics requirements placed on the project. The following section presents the plans and measures related to the requirements for the involvement of people in project activities. Section 0 deals with the protection of personal data, while the following section deals with the participation of non-EU countries in the project implementation. Section 0 outlines the aspects related to environment, health, and safety. The approach to developing trustworthy AI is then described.



The facts on the establishment and organization of the EAB are presented in Section 0. Supplementary documents in the form of annexes can be found at the end of the deliverable.



# 2 Ethics requirements

# 2.1 Ethics Appraisal Schema of the project ELOQUENCE

This subsection should contain details about the Ethics Appraisal Schema in order to explain the context of ethics evaluation, ethics requirements and needs for this deliverable.

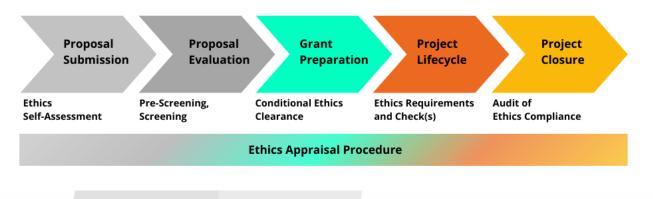
Following the successful scientific evaluation of the proposal, ELOQUENCE was assessed by a panel of ethics experts. This is part of the European Commission's Ethics Appraisal Scheme. The conclusions of the panel were presented in the Ethics Summary Report (Annex 10.1). The ethics panel conditionally approved the project. Conditional ethics approval means that the project can be carried out, but the approval is subject to conditions that must be fulfilled as "ethics requirements". These ethics conditions are related to several areas that could call ethical principles and standards into question. These are the following areas:

- Humans
- Personal data
- Non-EU Countries
- Environment, Health and Safety
- Artificial Intelligence

The evaluators considered that, due to the large amount of online and voice data processed in this project, a data protection officer is needed to help assess the impact of the data processing on the rights of individuals and to ensure that appropriate technical and organizational remedies are put in place from the start of the project (privacy-by-design). They also called for the informed consent of human participants to be documented. In addition, safety and security risks and the risks of misuse and manipulation of end users by generative AI should also be addressed by an ethics advisor. This could be the case, for example, with the secondary use of voice data to generate AI-based personalized content for advertising purposes.

Finally, the beneficiaries of the project must ensure that all ethics issues related to the activities under the GA are addressed following ethical principles, applicable international and national law, and the provisions of the GA.

The ethics requirements were "post-grant" - their fulfillment is foreseen during the active project phase after the GA has been signed. The ethics requirements have been summarized in one ethics deliverable (D9.1) and assigned to an additional, automatically created WP9 for which the Project Coordinator (PC) was responsible. To adequately address the ethics requirements, an action plan has been developed by the legal/ethics manager (PN) and the PC, who is ultimately responsible for complying with the ethics compliance of the project.



#### Figure 1 – Ethics Appraisal Procedure

# 2.2 ELOQUENCE approach to general ethics requirements

This section addresses the theoretical framework for the assessment and compliance with ethics in research requirements during the implementation of the ELOQUENCE project.



While ELOQUENCE will not appoint one single Ethics Advisor but four (see section 0), for a proper ethics assessment to take place, the European Commission provides a set of references and guidelines. These must be consistently present and duly considered by both the Ethics Board and the consortium at all times:

- The EU Grants Ethics Guide A-Z.
- The Ethics Advisors and Ethics Advisory Boards: Roles and Function in EU-funded Projects guidelines.
- HE Programme Guide.
- European Code of Conduct for Research Integrity

While detailed work on the advisory role will be provided in section 5, it is worth highlighting that these documents will help the Ethics Board to deliver their periodic and final assessments, avoiding addressing public apprehension towards science as well as alleviating any public concerns that may arise.

### 2.2.1 The EU Grants Ethics Guide A-Z

This document is designed to help staff in EU granting authorities (which use the SEP/SyGMa Ethics modules) to handle and raise ethics issues across the evaluation and ranking of proposals. In that sense, this guide is mainly referential for ELOQUENCE, as it outlines activities and processes (known as 'Ethics Appraisal Procedure') that were implemented transparently to the consortium either during the evaluation of the proposals or the GA preparation phase.

In the case of ELOQUENCE, the result of the ethical evaluation was positive which led to the formulation of an 'Ethics Summary Report'.

Nevertheless, this document has been thoroughly analysed by the PC and the PN. While chapters 1 and 2 of the guide are fundamentally informative and dedicated to support EU staff to properly raise ethical concerns in proposals, chapter 3 ("Grant management: Monitoring ethics issues") describes supervising ethical matters.

### 2.2.2 The Ethics Advisors and Ethics Advisory Boards: Roles and Function in EU-funded Projects Guidelines

This document aims at advising and assisting ELOQUENCE project in understanding and appropriately addressing the ethics issues raised in the 'Ethics Summary Report'.

To be precise, this document aims to provide guidance on the roles and operation of Ethics Board to monitor, guide and counsel ELOQUENCE project on ethical issues raised in the 'Ethics Summary Report' resulting in an obligation for the project to appoint an Ethics Board.

While considerations and clauses included in this guide could be consulted at any time, below can be found a list of those clauses that have been thoroughly analysed by the PC and PN:

- Clause 2: "Appointment/Recruitment, Expertise and Membership Criteria" In which specific details for ELOQUENCE are provided in section 5 of the present deliverable.
- Clauses 3, 4, 5 and 6: "The Advisory Role", "Establishing Working Practices to be fold by the Advisor", "Identifying Appropriate Ethical Best Practices and Criteria to Apply" and "Liaison with other relevant EUfunded projects and resources". In these clauses specific details for ELOQUENCE are provided in section 4 of the present deliverable.

### 2.2.3 HE Programme Guide

This document is the Horizon Europe (HE) Programme Guide that contains detailed guidance on the structure, budget and political priorities of Horizon Europe. It also includes details on how to prepare proposals, but the main purpose of this document is to help users understand the programme and its calls and prepare their proposals, by avoiding technical vocabulary, legal references, and jargon, and seeking to help readers find answers to any practical questions they may have about particular parts of the proposal.



In chapter 12 'Ethics and Integrity' of the document, the ethical dimension of research activities funded under HE is exhaustively revised. While details on all activities implemented on the European Commission's side can be followed in the guide, the most relevant sub-sections of the document for ELOQUENCE are those related to the provision of contextual information that has led to the appointment of the Ethics Advisor and the need for adding an extra WP in which 'ethics requirements' that the project must comply with are being set out.

### 2.2.4 European Code of Conduct for Research Integrity

ELOQUENCE is carried out with close attention to all ethical principles that it can be subjected to. This obligation stems directly from the project GA and is an important part of the philosophy of the project.

The most important of these rules are listed in the European Code of Conduct for Research Integrity, a document published by the ALLEA (European Federation of Academies of Sciences and Humanities), which encompasses researchers from 40 countries and whose mission is to work on frameworks for collaboration in research.

This Code lays down a set of principles that ELOQUENCE adopts, such as i) reliability in ensuring the quality of research, reflected in the design, the methodology, the analysis, and the use of resources; ii) honesty in developing, undertaking, reviewing, reporting, and communicating research in a transparent, fair, and unbiased way; iii) Respect for colleagues, research participants, society, ecosystems, cultural heritage, and the environment; iv) Accountability for the research in all stages of the project, including its management, training, supervision, and mentoring.





# 3 Humans

# 3.1 Recruitment and participation of individuals in the project

Various activities are carried out as part of the ELOQUENCE project. These activities will also involve external stakeholders and research participants. In order to successfully carry out the use cases and the project pilots, it is necessary to collect information resulting from the involvement of external stakeholders and participants. This information may include personal data. External stakeholders and participants refer to individuals who are not members/employees of the project partners and their respective organizations.

For the implementation of the project pilots, it is necessary to approach stakeholders and business units to involve them in the validation of the requirements and the expected outcome. The process will be facilitated through workshops/virtual meetings between the LLM developers and the business stakeholders, third-party application developers, and other relevant members of the ecosystem. This ensures active stakeholder involvement from the beginning of the process to ensure that their needs are considered. Thus, the involvement of external persons will be required for the evaluation and impact analysis. In addition, experience with the use of ELOQUENCE technology by a group of users will provide insights into possible optimizations with a view to larger-scale implementation. In addition, the list of key stakeholders also includes the members of the EAB, whose personal data are processed for the purpose of setting up this body and organizing its regular work.

Ethical considerations are also important for the participation of people in the dissemination and exploitation activities within ELOQUENCE. Participation in workshops, conferences, summer schools, and similar activities requires the disclosure of basic contact information. This is necessary for the smooth organization and management of such events, i.e. managing contact lists, invitations to events, disseminating reports and managing feedback, follow-ups and meetings, etc. Personal data that may be required includes title, first and last name, organization name, email address, postal address, organization address, occupation/position, and telephone/fax number. For online webinars and demonstrations organized by the project partners, the selection and recruitment procedures are carried out in such a way that the collection of personal data is not required.

Taking into account a variety of events planned for communication and dissemination purposes and the characteristics of potential participants, the project partner responsible for a given event is responsible for developing appropriate procedures for the event it organizes and for participation in it. Each project partner must adhere to the general principles set out in this document, but specific information sheets and consent procedures will be developed for each event. A partner (or group of partners) will do this in collaboration with the PC and with the support of the PN. In this way, the project consortium will determine a tailored approach, ensuring that each dissemination and communication context is compliant with the relevant ethical standards.

### 3.1.1 Recruitment and participation of individuals in the pilot led by TID

The TID pilot aims at simulating domestic or home-based scenarios characterized by both structured and unstructured dialogues. The participants will interact with a variety of cutting edge technologies from ELOQUENCE as voice or text interfaces. One such technology is our advanced voice assistant that has been designed to trigger various functionalities within these homes in response user commands and dialogues; for instance controlling televisions through simple verbal instructions or engaging multiple users via group social games like TRIVIA, where artificial intelligence systems are deployed as a means of providing intelligent control over questions and answers or selecting topics based on audience's requests.

The main purpose of the pilot is to simulate both within and between scenario's personalization of the ELOQUENCE's cutting-edge technologies (speech and LLMs) in a home environment while ensuring the privacy between sessions. This involves multiple user interactions (voice and text) and AI models that adaptively learn from both previous voice patterns as well dialogues within each specific household setting -- henceforth referred by their respective homes. The data collected during these personalized and interpersonal scenarios will serve to further enhance our initial AI models through federated learning in a secure environment.



For this study's selection criteria, participants will be primarily chosen from among the personnel staff at TID who possess a working knowledge of both English and Spanish languages and being over 18 years old.

### 3.1.2 Recruitment and participation of individuals in the pilot lead by UNS

The UNS pilot will simulate an environment of unstructured dialogues arising in contact centers offering medical assistance to new parents on handling various situations with newborns. Within the pilot, a multimodal audio corpus of unstructured dialogues will be collected. The UNS will perform staged recordings for data collection activities as well as for use case testing, evaluation, and validation. Participants will be mainly selected among personnel and students on a voluntary basis. The focus will be on the students that have basic knowledge in the signal processing field, but that will not be a limiting factor.

### 3.1.3 Recruitment and participation of individuals in the pilot led by CNR

The study ELOQUENCE Pilot 2, "Social context-aware language model detecting biases", aims to define a multilingual interaction scenario (English-Italian), incorporating social and cultural factors, to evaluate the capacity to generate socially acceptable statements of an agent built on top of ELOQUENCE technologies.

The scenario will consist of dialogue exchanges concerning social practices in which cultural/racial/gender aspects may play a relevant role and where it will be possible to assess the compliance of the language model with social expectations in the sentence construction and the possible existence of social biases.

Within the pilot, personal data will be collected by filling out an initial questionnaire and an implicit bias assessment test. Then, a corpus of unstructured dialogues and an evaluation of the conversation will be collected through registrations, interviews, and questionnaires. The CNR will systematically record and store data in various stages to facilitate data collection activities. The recorded data will be used for testing, evaluating, and validating use cases in a comprehensive manner.

The study aims to involve participants mainly selected among personnel and students (considering CNR subcontractors) on a voluntary basis. To the extent that this is possible and without limiting inclusion criteria, we are considering the following: knowledge of English or Italian language and being over 18 years old.

# 3.2 Informed consent procedure

Informed consent procedures that will be implemented in cases where individuals participate in the project will be explained in this subsection.

One of the most important aspects of the ethical conduct of research is the proper handling of informed consent. The relevant ethics rules aim to ensure that individuals understand what they are consenting to and that they agree to participate in the research. According to Article 4 of the GDPR, 'consent' of the data subject is any freely given, specific, informed, and unambiguous indication of the data subject's wishes by which he or she, by a statement or by clear affirmative action, signifies agreement to the processing of personal data relating to him or her. However, it must be emphasized that the scope of informed consent for participation in research projects, such as ELOQUENCE, is broader and includes not only consent to the processing of personal data but also to the processing of other aspects of personality.

The ELOQUENCE project consortium will take all necessary steps to ensure that all informed consent requirements are properly met. In particular, all data controllers should take all measures to be able to prove that the individuals participating in the project have consented to the processing of their personal data. The text of the declaration of consent must be written in clear and plain language. In addition, the persons are provided with the necessary information sheets so that they receive the relevant information about the project, applicable tasks and responsibilities of those involved in the project. In addition, the information sheets will include details of the data collected, protocols, participants' rights, and contact details. All consents obtained must be given voluntarily and without pressure on individuals to participate in the project. All participants will be given the opportunity to ask questions and receive clear answers before making a decision about their participation. This is not only necessary to process personal data lawfully, but also to protect the human dignity and integrity of the participants. Finally,



participants will have the right to withdraw their consent at any time and without giving reasons. The project consortium will carry out all steps related to consent with the utmost care to ensure that all ethical and legal requirements are met.

A significant proportion of the participants, who will be involved in the project activities, will consist of the internal staff of the project partners. In these cases, informed consent will not be required.

### 3.2.1 Informed consent procedures in the TID

In the TID pilot, the participant subjects shall receive information regarding details pertaining to research aims in the ELOQUENCE project, including the details on this specific pilot, as well as the duration for which we would need their participation, about the event being recorded by project staff during each session and the data processing and privacy policy.

Specifically, the participant shall receive the pilot's documentation comprised of an Informed participation document, a Consent form as well an Information sheet shall subsequently follow. All document will be available bilingually, in English and Spanish. Additionally, any uncertainty regarding participation in the TID pilot activities as well doubts about related aspects, such aforementioned research aims or data processing, will also receive clarification through addressing the questions by participants. Once the subjects' participation is duly confirmed via signing up for said forms; they can then start participation and/or data collection activities.

The Information Sheet Template and the Informed Consent Template that will be used by TID are included in Annex 10.2.1 and Annex 10.3.1 of this deliverable.

### 3.2.2 Informed consent procedures in the UNS

The UNS pilot will perform only staged recordings. Participants will be selected mainly among personnel and students. Before the selection of participants and the event recording process, potential participants will be informed about the details of the project and the event being recorded by the project staff. Participants will also receive a paper document containing Informed participation, a Consent form, and Information Sheet. The document will be provided in Serbian and English language. After consenting, the participant will start with the staged recording activities for the purpose of data collection, following instructions of the project staff.

Use case testing, evaluation and valuation activities of the UNS pilot will also be performed in the manner of the staged recording so that a similar procedure will be followed as in the case of the data collection activities.

The Information Sheet Template and the Informed Consent Template that will be used by UNS are included in Annex 0 and Annex 10.3.2 of this deliverable.

### 3.2.3 Informed consent procedures in the CNR

Potential participants will be informed about the details of the project and the aims of the research activities that will be performed in Pilot 2. Then, the participants will be informed about how long they will be involved in the research, how often they will need to participate, and for how long each time. Next, the participants will be informed that the project staff may record their participation. Finally, participants will also receive a paper document containing Informed participation, a Consent form, and an Information Sheet. The document will be provided in Italian and English language. After the formalization of their participation through the signing of the consent form, the participants can start the data collection activities by following the project staff. The Information Sheet Template and the Informed Consent Template that will be used by CNR are included in Annex 10.2.3 and Annex 10.3.3 of this document.



# 4 Personal data

Strong privacy protection will be founded by an appropriate governance mechanism within the ELOQUENCE project. This is necessary to ensure the protection of personal data and compliance with relevant data protection laws. Therefore, the privacy governance mechanism will consist of components that will guide a privacy function to comply with privacy laws and regulations. Those who process personal data should determine the scope of personal data collected and processed. The applicable privacy and data protection laws and regulations are then determined. The scope of personal data includes not only the type of information but also the purpose of the processing, the place of storage, the details of the transfer, the retention period, and the measures taken to secure the information. This approach enables stakeholders to understand the entire lifecycle of personal data on the one hand and the legal challenges on the other.

The governance mechanism for protecting personal data in the project is going to be built on the functions as follow below.

# 4.1 Privacy by design

Efforts to protect personal data will involve various processes, instruments and regulations. Their standardization forms the framework based on the concept of "privacy by design". This framework stipulates that privacy and data protection are embedded throughout the entire lifecycle of technologies, from the early design phase, through deployment and use, to final disposal or disposition. Therefore, project partners will build privacy directly into the technologies, systems and processes/practices, adhering to the following basic principles:

- Proactive, not reactive; Preventive, not remedial privacy intrusive events will be pre-emptively assessed and stopped before they occur. In this way, privacy risks are prevented from arising in the first place.
- Privacy as the default Privacy will be built into the system by default.
- Privacy embedded into the design Privacy will be the core functionality and is developed and provided as such.
- Full functionality Positive sum, not zero sum legitimate interests and objectives are considered rather than making unnecessary compromises.
- End-to-end security, full lifecycle protection Strong security measures will be implemented throughout the data lifecycle.
- Visibility and transparency all privacy-relevant components and parts and processes will be visible and transparent to users and providers.
- Respect for user privacy The interests of the individual will be respected through the development of privacy policies, appropriate notices and user-friendly options.

It must be emphasized that one of the most important contributions to the concept of "privacy by design" is the data management plan that will be developed and improved during the course of the project implementation. This document will be the source of self-regulation that will govern, among other things, many aspects of personal data protection and privacy, including access management, the application of technical and organizational measures to secure data, data retention/deletion, and other related principles and rules.

# 4.2 Data protection principles

Any processing of personal data in the context of the project must be lawful and fair. It should also be transparent to the data subject by providing relevant information about the collection, use or other processing of data and the extent to which the personal data is processed. The personal data collected for the implementation of the project must be adequate, relevant, and limited to what is necessary for the purposes for which they are processed. Therefore, the storage of personal data will be kept to a strict minimum. Personal data will only be processed if the purpose of the processing cannot reasonably be achieved by other means. Time limits will be set to ensure that personal data is not kept for longer than necessary. All reasonable steps will be taken to rectify or erase inaccurate personal data. Finally, personal data will be processed in a manner that ensures appropriate security and



confidentiality of the personal data, including preventing unauthorized access to or use of personal data and the equipment used for processing.

The lawfulness of the processing of personal data will be ensured by the choice of an appropriate legal ground for the processing. Therefore, the responsible project partners will ensure that the consent of the data subjects is obtained and properly stored. Where possible, alternative legal grounds will be used to ensure lawful data processing. In addition, it must be emphasized that all relevant rights of data subjects will be exercised upon lawful requests are received.

# 4.3 Data Protection Impact Assessment

Upon agreement between relevant stakeholders including the PC, relevant project partners, PN, and local DPOs, a Data Protection Impact Assessment (DPIA) will be conducted. DPIA will be needed in cases as laid down by the applicable laws (GDPR). Even though there is neither a universal methodology for the DPIA nor a mandatory structure of the assessment, it is expected that the DPIA contains the following:

- description of the envisaged processing operations
- the purposes of the processing, including, where applicable, the legitimate interest pursued by the controller;
- an assessment of the necessity and proportionality of the processing operations in relation to the purposes;
- an assessment of the risks to the rights and freedoms of data subjects;
- the measures envisaged addressing the risks, including safeguards, security measures, and mechanisms to ensure the protection of personal data
- demonstration of compliance with the GDPR taking into account the rights and legitimate interests of data subjects and other persons concerned.

### 4.4 Data security

Each project partner must implement appropriate technical and organizational measures to ensure the security of the processing of personal data. The assessment of appropriateness should take into account the state of the art, the costs of implementation, the nature, scope, context and purposes of the processing of personal data as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons. In order to support the project partners with addressing the ethics requirements and effectively protecting personal data, there are several recommendations on what to pay particular attention to when processing personal data with regard to information security. These include the following points in particular:

- meet security requirements,
- identify reasonably foreseeable and internal risks to security and unauthorized access to the network,
- minimize security risks, including through risk assessment and regular testing.

As part of information security efforts, certain employees should coordinate and be responsible for the information security program. Information security efforts may consist of technical, physical and administrative controls.



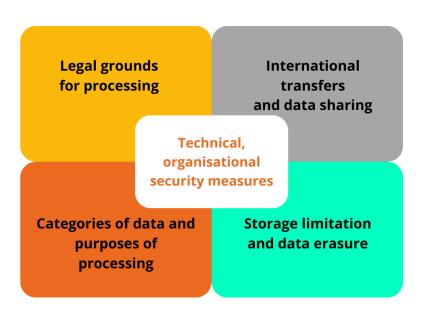


Figure 2 – Privacy functions

# 4.5 The roles and responsibilities

The primary responsibility for implementing data protection measures in accordance with applicable laws lies with the project partners who process personal data. Therefore, the Data Protection Officers (DPOs) or staff responsible for data protection issues must ensure that project partners process personal data in the context of project activities in accordance with applicable data protection legislation. To this end, DPOs should be able to perform their tasks independently.

It must be emphasized that the ELOQUENCE project is not a legal entity, but a formal agreement between project partners and the European Commission. Therefore, the project cannot be formally held responsible for possible violations of applicable data protection laws and regulations, including national, regional or EU laws. However, the project partners could be held accountable by national data protection authorities for a breach of the law. The PC is formally responsible for ensuring that project activities are carried out in accordance with the relevant laws, including data protection laws. However, the scope of the PC's responsibility is limited and it should ensure that project activities are carried out in accordance with the terms of the GA. Finally, the PN should oversee the implementation of project activities to ensure that compliance requirements are met. If risks or violations of law are identified, the PN should address the issue and assist the PN in mitigating any adverse effects and/or advise on appropriate remedial action.

# 4.6 The DPO contacts

The contact details of the DPO of each organization are presented in Table 1 below. For those partners that have not appointed a DPO, the contact details of the person responsible for the data protection on behalf of their organization are provided.

Table 1 Project partner's DPO contact information

Participant organization name	Short name	DPO name	DPO email
TELEFONICA INNOVACION DIGITAL SL	TID	Antonio López- Carrasco (acting DPO)	antonio.lopez- carrascocomajuncosas@telefonica.com



BARCELONA SUPERCOMPUTING CENTER CENTRO NACIONAL DE SUPERCOMPUTACIONBSCMaría Bilbaombilbao@segurdades.comFONDAZIONE BRUNO KESSLERFBKAnna Benedetti dpo@bsc.esprivacy@fbk.eu dpo@bsc.esUNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKAUNSDragana Bajovicpdpeloquence@uns.ac.rsEUROPEAN UNIVERSITY INSTITUTEEUIChristian MaiwaldData_Protection_Officer@EUI.euVYSOKE UCENI TECHNICKE V BRNEBUTLucie Schimmelovápoverenec@vut.czPRIVANOVA SASPNDjordje Djokicdjordje@privanova.comINOSENS DOO NOVI SADINOMaja Fisicfisic@inosens.rsTRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.TLMartin Jarcmartin@transformation-lighthouse.comGRANTXPERT CONSULTING LIMITEDGXCharis Spanoudischaris@grantxpert.euOMILLA MONOPORSOPI ETAIREIA FURIOFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPRESION KAI SYSTIMATONSYNTheodore Zahariadisghalantzis@omilia.com dpo@omilia.comSYNELUXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIASNNTheodore Zahariadiszahariad@synelixis.comFONDATION DE L'INSTITUT DE RECHERCHE IDAPIDIAPBastien Crettolhttps://www.idiap.ch/en/about/people /243BRUNEL UNIVERSITY LONDONSULStelios Andreadakisstelios.andreadakis@brunel.ac.ukUNIVERSITY OF ESSEXUESSEXClare Chafifieddpo@essex.ac.uk	CONSIGLIO NAZIONALE DELLE RICERCHE	CNR	Gianluca Fasano	dpo@cnr.it
FONDAZIONE BRONO RESSLERFBRAnna Benedettidpo@bsc.esUNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKAUNSDragana Bajovicpdpeloquence@uns.ac.rsEUROPEAN UNIVERSITY INSTITUTEEUIChristian MaiwaldData_Protection_Officer@EUI.euVYSOKE UCENI TECHNICKE V BRNEBUTLucie Schimmelovápoverenec@vut.czPRIVANOVA SASPNDjordje Djokicdjordje@privanova.comINOSENS DOO NOVI SADINOMaja Fisicfisic@inosens.rsTRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.O.TLMartin Jarcmartin@transformation-lighthouse.comGRANTXPERT CONSULTING LIMITEDGXCharis Spanoudischaris@grantxpert.euOMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EFTHYNIS PAROXISOMRaagiotis Ralantzisgda@domilia.com gda@domilia.comSYNELIXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIASYNTheodore Zahariadiszahariad@synelixis.comFONDATION DE L'INSTITUT DE RECHERCHE IDIAPDIAPStelios Andreadakisstelios.andreadakis@brunel.ac.uk		BSC	María Bilbao	mbilbao@segurdades.com
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# 5 Non-EU Countries

ELOQUENCE consortium is composed of project partners based outside the EU. Two project partners are based in Serbia. Serbia is an associated country in the sense of Horizon Europe Regulation 2021/695. Necessary transfers of personal data to and from partners based outside the EU will be only for the purpose of the project realization. Appropriate safeguards required by relevant requirements of the EU laws (particularly those laid down by Chapter V and Art. 32 of the GDPR) will be ensured for the purpose of lawful data transfer.





# 6 Environment, Health and Safety

By relying on the relevant guidelines and practices, the project consortium has assessed potential risks and harm to health, safety, and the environment that could arise from the implementation of the project activities. The assessments have concluded that there are no risks and harms on health and safety, whereas potential risks and harms may affect the environment during the development of the AI.

The development and deployment of AI brings with it a number of environmental risks and harms that are often overlooked in the excitement of technological advancement. One of the main problems is the significant energy consumption associated with training and running AI models. The computational demands of AI algorithms, especially deep learning models, require large amounts of electricity. This reliance on energy-intensive computation can contribute to an increase in carbon emissions and exacerbate the environmental impact of the energy sector. In addition, the data infrastructure required to support AI applications often relies on huge data centers that consume large amounts of electricity for cooling and operation. These data centers contribute significantly to carbon emissions and can put a strain on local natural resources. In addition, reliance on cloud computing for AI services can lead to increased energy consumption for data transmission and storage, particularly as the volume of data generated and processed by AI continues to grow exponentially.

The project consortium is aware of the potential environmental risks and harms and will therefore take appropriate measures if necessary. Addressing the risks and harms associated with AI development requires a multi-faceted approach. Innovations in AI design, such as more energy-efficient processes, and advances in software optimization will help to reduce the energy footprint of AI systems. In addition, the relevant project partners will prioritize sustainable practices in AI development, including responsible sourcing of materials, efficient recycling of electronic components and the adoption of ethical guidelines that consider environmental impact alongside technological advancement. By incorporating environmental considerations into the design and deployment of AI solutions developed in the course of the project implementation, the project consortium will strive for sustainable and responsible innovation.



# 7 Artificial Intelligence

Taking into account the plans for the development of AI, the project partners are committed to respecting ethical principles in relation to AI. Therefore, this project will pay particular attention to the principles recommended in two relevant sources - the European Commission's Ethics Guidelines for Trustworthy AI and the EU AI Act, formally known as the Regulation laying down harmonized rules on AI.

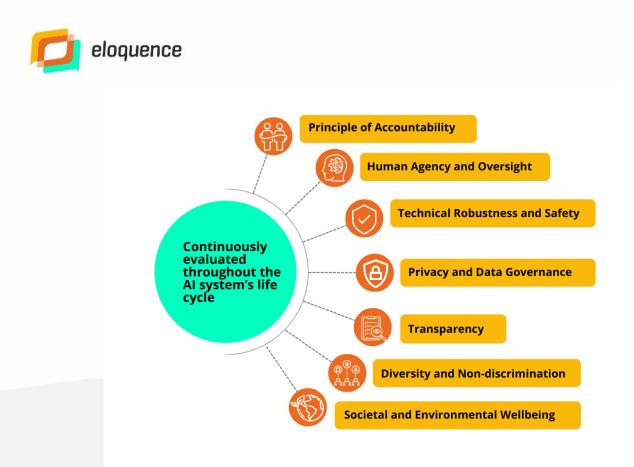
While the EU AI Act regulates the development and deployment of AI by enshrining specific rules, granting certain scope of rights to individuals and imposing obligations to AI developers, the European Commission's Ethics Guidelines for Trustworthy AI (Guidelines) promote three critical components that should be met throughout the lifecycle of the system. First, the AI should be lawful and comply with all applicable laws and regulations. Second, it should be ethical ensuring adherence to ethical principles and values. The third requirement relates to robust AI, both from a technical and social perspective. Guidelines are intended to go beyond a list of ethical principles by providing guidance on how these principles can be implemented in socio-technical systems. Guidelines provide three levels of operationalization – from the most abstract to the most concrete. The requirements should be complementary, but where there is tension between them, society should seek to align them.

The development, deployment, and use of AI should take into account the ethical principles of respect for human autonomy, avoidance of harm, fairness, and explainability. Particular attention should be paid to situations in which vulnerable groups (e.g. children, people with disabilities) are affected. Situations characterized by asymmetries of power or information, e.g. between employers and employees or between companies and consumers, should also be taken into account. Considering that AI systems may pose certain risks and have negative impacts, including those that are difficult to predict, appropriate measures to mitigate these risks should be identified, implemented and assessed.

According to the Guidelines, the development, deployment, and use of AI systems should meet the seven key requirements for trustworthy AI:

- human agency and oversight,
- technical robustness and safety,
- privacy and data governance,
- transparency,
- diversity, non-discrimination and fairness,
- environmental and societal well-being
- accountability.

Both technical and non-technical methods should be considered to ensure the implementation of the requirements.





Research and innovation should be mandated to support the evaluation of AI systems and to meet key ethical requirements. The results obtained should be disseminated and open questions addressed to the wider public. Communication should be clear and proactive. It must inform stakeholders about the capabilities and limitations of the AI system so that realistic expectations can be raised and how the requirements will be implemented. Transparency is therefore required in relation to how the stakeholders will deal with an AI system. Finally, the traceability and auditability of AI systems, especially in critical contexts or situations, should be facilitated.

The fundamental tensions between different principles and requirements and the solutions to overcome them should be continuously identified, assessed, documented, and communicated. Assessments will never be exhaustive, so trustworthy AI is not about ticking boxes, but about continuously identifying and implementing requirements, evaluating solutions, and ensuring improved outcomes throughout the lifecycle of the AI system. For all these reasons, all project partners involved in AI development will take all relevant principles into account. The implementation of the principles and their operationalization will be monitored and regularly assessed. The main efforts to this end will be undertaken within WP6. However, it should not be overlooked that ethics compliance has a transversal character and will prevail over all other WPs, tasks, and many deliverables.



# 8 Ethics Advisory Board

The ELOQUENCE project consortium is committed to addressing potential ethical issues in accordance with the applicable regulatory frameworks, ethical standards and other ethics requirements. Due to the nature of the research, ethical implications are possible and therefore all project partners are committed to comply with the Horizon Europe's ethical standards and rules. Horizon Europe's ethical standards and guidelines are strictly applied regardless of the country in which the research takes place. Therefore, all partners are going to conduct research in accordance with the fundamental principles of research integrity, such as reliability, honesty, respect, and accountability. In order to meet the ethics requirements, the PC and the PN have developed an action plan. Taking into account the results of the Ethics Appraisal Scheme, the action plan includes the formation of the EAB.

The members of the EAB have leading and unique expertise in areas that are critical to the project. The EAB is independent and has no formal responsibility towards the project. The EAB is regularly informed about the status of the project and the current perceived ethical and data protection issues and is invited to comment on them. In particular, the independent board members are invited to review the deliverables of interest and to express their opinions on ethical and social issues related to the project and/or propose solutions. In this way, the EAB, with the support of the PC, ensures that all relevant activities, including the processing of personal data and the development of trustworthy AI, are continuously compliant with applicable regulations.

The external members of the EAB have been selected on the basis of their scientific achievements, expertise, and network, their role and expertise in national and international policy-making, and their role as and connection to relevant stakeholders.

To date, the following members have accepted to be a part of the project's EAB:

- Adriana Minovic is a seasoned lawyer specializing in diverse regulatory and compliance issues across various industries, including ICT, Telecom, Media, R&D, i-Gaming, Aviation, and Life Science. With expertise in Data Protection, Intellectual Property, Competition & State Aid Law, AML, and Anti-Corruption, Adriana has built a reputation for her comprehensive understanding of legal complexities in innovative and data-driven sectors. Her key competencies include GDPR compliance, information and cyber security policy development, regulatory impact assessment, and public policy advocacy. With a focus on strategic litigation, regulatory strategy, and ethics evaluations, Adriana Minovic demonstrates a commitment to ensuring legal compliance and ethical practices within complex regulatory environments.
- Anastasiya Kiseleva is an accomplished researcher conducting an international and interdisciplinary PhD on AI transparency in healthcare, supported by the EUTOPIA program. Her expertise lies in blending legal and technical perspectives, with a focus on the European Health Data Space and AI-based medical devices. Anastasiya is an active member of the Health&Ageing Law Lab (HALL) at VUB, contributing to various topics in health law and technologies. Her papers have received recognition and citations by esteemed institutions like the European Parliament and Commission. She serves on EAB for EU-funded projects and acts as an external AI Policy Expert at EUMASS. Joining the Editorial Board of the European Health & Pharmaceutical Law Review underscores her commitment to advancing ethical research practices and shaping AI policies in healthcare.
- Hanne Elsen is a seasoned legal professional with a wealth of experience spanning diverse roles. As a DPO at Universiteit Gent, she ensures regulatory compliance and data security. Simultaneously, she serves as an independent expert for the European Commission, contributing her legal acumen. With a background in sales, Hanne brings a unique perspective to her legal career, having honed her negotiation and communication skills. Her experience also includes roles in mediation and research coordination, where she showcased her aptitude for problem-solving and policy analysis.
- Amal Marc, with nearly two decades of expertise in new technologies, digital regulation, and human rights/ethics, brings extensive experience to her roles. She is currently the Founder and Independent Advisor at Sublimis, focusing on digital compliance, cyber risks, and eco-responsible business. Her previous roles encompassed domains such as legal, cybersecurity, and compliance, including engagements in



European R&D programs. Amal's diverse background spans legal, cybersecurity, and compliance fields, driving impactful projects aligned with the global climate agenda and promoting responsible business practices.

The EAB was formally established following the invitation of the PC to the selected experts. The experts were proposed by the PN. After accepting their role on the panel, all EAB members signed the Non-Disclosure Agreement (NDA). The NDA template can be found in Annex 10.4.

The first meeting of the EAB was held on 26<sup>th</sup> April. The meeting commenced with introductions of the Ethics Advisory Board members, signaling their commitment to ethical guidance and previous experience in law and ethics. The overview of the ELOQUENCE project highlighted the challenges posed by large language models and the necessity for technology aligned with human values. Nine work packages were detailed, stressing compliance with European values and ethical standards, with pilots underscored for evaluating technology effectiveness. Pilot overviews emphasized privacy preservation and user involvement. The open discussion touched on call prioritization, medical assessment compliance, and user disclaimers. Overall, the meeting emphasized ethics, compliance with necessary compliance standards and values, and the importance of technology aligning with EU values in the ELOQUENCE project implementation.





# 9 References

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- European Commission. Ethics Advisors and Ethics Advisory Boards Roles and Function in EU-funded Projects (2023). Available at <u>https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/horizon/guidance/roles-and-functions-of-ethics-advisory-ethics-advisory-boards-in-ec-funded-projects\_he\_en.pdf</u>
- European Code of Conduct for Research Integrity. ALLEA (European Federation of Academies of Sciences and Humanities (2023). Available at <a href="https://allea.org/wp-content/uploads/2023/06/European-Code-of-Conduct-Revised-Edition-2023.pdf">https://allea.org/wp-content/uploads/2023/06/European-Code-of-Conduct-Revised-Edition-2023.pdf</a>
- 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 (General Data Protection Regulation) (Text with EEA relevance) (OJ L 119
  04.05.2016, p. 1, ELI: <u>http://data.europa.eu/eli/reg/2016/679/oj</u>)
- European Parliament legislative resolution of 13 March 2024 on the proposal for a regulation of the European Parliament and of the Council on laying down harmonised rules on Artificial Intelligence (Artificial Intelligence Act) and amending certain Union Legislative Acts (COM(2021)0206 – C9-0146/2021 – 2021/0106(COD))



# 10 Annex 10.1 Ethics Summary Report

Associated with document Ref. Ares(2023)4593548 - 03/07/2023

### Ethics Summary Report

*_	Call Reference	HORIZON-CL4-2023-HUMAN-01-CNECT
÷ .	Proposal Number	101135916
*	Acronym	ELOQUENCE

### Ethics Issues

Humans

Personal data

**Non-EU countries** 

Environment, health and safety

### Artificial intelligence

### Ethics Opinion

Conditional ethics clearance (clearance is subject to conditions, i.e. ethics requirements. The requirements must either be fulfilled before grant signature or become part of the grant agreement)

### External Independent Ethics Advisor/Board

In your opinion, would it be exceptionally necessary to appoint an external independent ethics advisor or an ethics board (with a minimum of three experts) reporting periodically to the Commission/Agency/funding

body? A large quantity of online data, as well as voice data, will be processed in this project. Therefore, a data protection officer is required to assist in assessing the impact of the data processing on the rights of individuals and ensure that appropriate technical and organisational mitigation measures are in place from the start of the project (Privacy-by-design). The informed consent of human participants should also be documented. Safety and security risks, as well as the risks of misuse and manipulation of endusers via generative AI, should also be addressed by an Ethics Advisor. This could be the case, for example, in the event of secondary use of voice data in order to generate AI-based personalised content for advertisement purposes.

# General requirement applicable to all grants

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

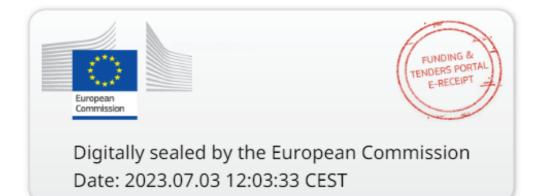
Yes

Ye

Yes

Ye





This electronic receipt is a digitally signed version of the document submitted by your organisation. Both the content of the document and a set of metadata have been digitally sealed.

This digital signature mechanism, using a public-private key pair mechanism, uniquely binds this eReceipt to the modules of the Funding & Tenders Portal of the European Commission, to the transaction for which it was generated and ensures its full integrity. Therefore a complete digitally signed trail of the transaction is available both for your organisation and for the issuer of the eReceipt.

Any attempt to modify the content will lead to a break of the integrity of the electronic signature, which can be verified at any time by clicking on the eReceipt validation symbol.

More info about eReceipts can be found in the FAQ page of the Funding & Tenders Portal.

(https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/faq)

Commission européenne/Europese Commissie, 1049 Bruxelles/Brussel, BELGIQUE/BELGIÉ - Tel. +32 22991111



# 10.2 Informed consent template 10.2.1 Informed Participation & Consent Form and Information Sheet - TID

### About the Research Project

#### **ELOQUENCE EU-funded Project**

ELOQUENCE ("Multilingual and Cross-cultural interactions for context-aware, and bias controlled dialogue systems for safety-critical applications") (hereafter the "ELOQUENCE Project") is an EU-funded project pioneering the development of advanced voice/chatbot technologies aimed at transforming unstructured dialogues into comprehensible, safe, and unbiased interactions.

The focus is on creating self-learning, adaptable models for diverse languages and use cases, emphasizing sustainability and European values, especially in safety-critical applications.

The ELOQUENCE project has received funding from the European Union's Horizon 2020 Research and Innovation Action under grant agreement No 101135916.

The ELOQUENCE project started on 01/01/2024 and has a duration of 36 months.

#### **Research aspects**

Attaining privacy in domestic surroundings whilst simultaneously ensuring personalization, advanced AI capabilities and user-specific customizations is a pivotal component for seamlessly integrating existing language technologies with the individual's preferences or unique lifestyle practices.

To address this issue, the Research performed in the ELOQUENCE's Pilot 1, "Privacy-preserving language model learning through decentralized training in smart homes", will showcase unsupervised algorithms based on the history of dialog interactions and the surrounding conditions from each simulated home environment. The pilot focus on incorporating iterative design methodologies and different user's participation in a privacy by design architecture for unsupervised training. These scenarios will focus on both human-human, as playing a TRIVIA game, and human-machine, as voice commands to AURA virtual assisstant, within several simulated domestic environments. The pilot will evaluate how a general model performs in each independent home scenario and shall create specific language models and methods to assess a user-tailored model's performance and its personalization to each home environment.

Your participation will assist the Partners in performing their research activities, testing and validating the ELOQUENCE outputs. Participation is entirely voluntary and does not involve financial compensation. Potential disadvantages or risks of participating in the research activities, testing and validations of the ELOQUENCE outputs are kept to a minimum. You will have the right to withdraw from the research activities, testing, and validations at any time during the ELOQUENCE Project.

### **ELOQUENCE** Project Partners

In the following table, you can find information about the ELOQUENCE Consortium.

#### Table 1: ELOQUENCE Consortium.

Participant No.	Participant organisation name	Country
1	TELEFONICA INNOVACION DIGITAL SL	ES
2	CONSIGLIO NAZIONALE DELLE RICERCHE	IT



# eloquence

3	BARCELONA SUPERCOMPUTING CENTER CENTRO NACIONAL DE SUPERCOMPUTACION	ES
4	FONDAZIONE BRUNO KESSLER	IT
5	UNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKA	RS
6	EUROPEAN UNIVERSITY INSTITUTE	IT
7	VYSOKE UCENI TECHNICKE V BRNE	CZ
8	PRIVANOVA SAS	FR
9	INOSENS DOO NOVI SAD	RS
10	TRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.O.	SI
11	GRANTXPERT CONSULTING LIMITED	CY
12	OMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EFTHYNIS PAROXIS PLIROFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPIRESION KAI SYSTIMATON	EL
13	SYNELIXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIA	EL
14	FONDATION DE L'INSTITUT DE RECHERCHE IDIAP	СН
15	BRUNEL UNIVERSITY LONDON	UK
16	UNIVERSITY OF ESSEX	UK

#### **ELOQUENCE** Project contact details

#### Table 2: ELOQUENCE Project contact details

Project Coordinator	Scientific Coordinator
Jordi Luque Serrano	Alessio Brutti
TELEFONICA INNOVACION DIGITAL SL jordi.luqueserrano@telefonica.com	FONDAZIONE BRUNO KESSLER alessio.brutti@fbk.eu

#### About the participant

In the event you would like to Participate in the ELOQUENCE Project, please provide us with the following information, which will be processed in accordance with the below Information Sheet (the "**Privacy Policy**"):

First name	 
Last name	 
Organisation	 
Title/function	 



Email address

#### **Participation & Consent**

#### Table 3: Template of the Participation & Consent Form

I volunteer to participate in the Research described above, which is conducted in the context of the ELOQUENCE Project.	Yes	No 🗆
I understand that my participation is voluntary (my choice).	Yes	No 🗆
I understand that I will not receive any financial compensation for my participation.	Yes	No 🗆
I am aware that I have the right to withdraw from the Research at any time in the ELOQUENCE Project.	Yes	No 🗆
I understand that participation may involve being interviewed by researchers and members of the ELOQUENCE Project and that I may be recorded during such interview.	Yes	No 🗆
I have read and understood the explanation provided to me about the ELOQUENCE Project.	Yes	No 🗆
I have read and understood the Privacy Policy and I consent to the processing of my personal data as described in the Privacy Policy (see underneath).	Yes □	No 🗆
I agree to have my role and/or organisation mentioned in the reports, including public reports, to be submitted to the European Commission and published online.	Yes	No 🗆
I have had all my questions answered to my satisfaction.	Yes	No 🗆
I know who to contact if I have any question about the ELOQUENCE Project and my privacy.	Yes	E No 🗆
I have been given a copy of this informed participation and consent form.	Yes □	No 🗆

First name \_\_\_\_\_\_\_



### 10.2.2 Informed consent - UNS

### **INFORMED PARTICIPATION & CONSENT FORM**

I. ABOUT THE RESEARCH PROJECT

1. ELOQUENCE EU-funded Project

ELOQUENCE is an EU Research and Innovation Action (RIA) project.

Its main focus will be to research and deliver innovative technologies for collaborative voice/chat bots. ELOQUENCE aims to create several mockup databases designed around pilots for both call centre and smart home scenarios. These multilingual and multimodal data of semi-structured and unstructured dialogues will serve to continuously evaluate ELOQUENCE technologies.

The ELOQUENCE project has received funding from the European Union's Horizon 2020 research and innovation programme under grant agreement No 101135916. The ELOQUENCE project started on 1 January 2024 and has a duration of 36 months.

2. Research aspects

The project Partners will define and formalise the requirements of the framework that will be used for development and assessment of the conversational AI methods. In order to do so, the Partners will notably justify the importance of the framework, define the scenarios for various pilots, define and formalise the security and compliance requirements, define and formalise the architecture, define the maturity level methodology and the questionnaire for the assessment, define the benchmarking criteria and design the architecture which consists of hardware and functional building software components with appropriate interfaces to facilitate their development.

UNS is both one of the data providers in the project and will also develop algorithms for processing the data from all data providers and datasets within ELOQUENCE. UNS will handle all ELOQUENCE data, either local or external, by keeping it in a secure server, password protected, and with access rights respecting minimization principle (i.e., only the personnel necessary for performing a given task will have access to the data necessary for completing the task).

In order to define the framework requirements and develop the framework, as described above, the Partners will gather input, notably through interviews and questionnaires, from stakeholders and end-users. Your participation in the recording process will assist the Partners in the development and assessment of the ELOQUENCE conversational AI methods. Participation is entirely voluntary and does not involve financial compensation. There are no potential disadvantages or risks of participating in the Research. You will have the right to withdraw from the Research at any time in the Project.

#### 3. Project Partners

The Partners of the ELOQUENCE project are the following:

Organisation Name		Country
1	TELEFONICA INNOVACION DIGITAL SL	SPAIN
2	CONSIGLIO NAZIONALE DELLE RICERCHE	ITALY



# eloquence

3	BARCELONA SUPERCOMPUTING CENTER CENTRO NACIONAL DE SUPERCOMPUTACION	SPAIN
4	FONDAZIONE BRUNO KESSLER	ITALY
5	UNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKA	SERBIA
6	EUROPEAN UNIVERSITY INSTITUTE	ITALY
7	VYSOKE UCENI TECHNICKE V BRNE	CZECH REPUBLIC
8	PRIVANOVA SAS	FRANCE
9	INOSENS DOO NOVI SAD	SERBIA
10	TRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.O.	SLOVENIA
11	GRANTXPERT CONSULTING LIMITED	CYPRUS
12	OMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EFTHYNIS PAROXIS PLIROFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPIRESION KAI SYSTIMATON	GREECE
13	SYNELIXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIA	GREECE
14	FONDATION DE L'INSTITUT DE RECHERCHE IDIAP	SWITZERLAND
15	BRUNEL UNIVERSITY LONDON	UNITED KINGDOM
16	UNIVERSITY OF ESSEX	UNITED KINGODM

#### 4. Project contact details

Coordinator	Communication
Jordi Luque Serrano	Branislav Popovic
jordi.luqueserrano@telefonica.com	pdpeloquence@uns.ac.rs

#### II. ABOUT THE RESEARCH PARTICIPANT

In the event you would like to participate in the Research, please provide us with the following information, which will be processed in accordance with the below Information Sheet (the "Privacy Policy"):

First name	
Last name	
Organisation	



Title / function		
Email address		
5.		
III. RESEARCH PARTICIPATION & CONSENT		
I volunteer to participate in the Research described above conducted in the context of the ELOQUENCE Project.	Yes □	No 🗖
I understand that my participation is voluntary (my choice).	Yes □	No 🗖
I understand that I will not receive any financial compensation for my participation.	Yes	No 🗖
I am aware that I have the right to withdraw from the Research at any time in the Project.	Yes 🗖	No 🗖
I understand that participation may involve being interviewed by researchers and members of the Project and that I may be recorded during such interview.	Yes D	No 🗖
I have read and understood the explanation provided to me about the Project.	Yes □	No 🗖
I have read and understood the Privacy Policy and I consent to the processing of my personal data as described in the Privacy Policy.	Yes D	No 🗖
I agree to have my role and/or organisation mentioned in the reports, including public reports, to be submitted to the European Commission and published online.	Yes □	No 🗖
I have had all my questions answered to my satisfaction.	Yes 🗖	No 🗖
I know who to contact if I have any question about the Project and my privacy.	Yes □	No 🗖
I have been given a copy of this informed participation and consent form.	Yes □	No 🗖
First       name		
Last		
Signature		
Date City / Town		

# 10.2.3 Informed Participation & Consent Form and Information Sheet - CNR

About the Research Project

**ELOQUENCE EU-funded Project** 



ELOQUENCE ("Multilingual and Cross-cultural interactions for context-aware, and bias controlled dialogue systems for safety-critical applications") (hereafter the "ELOQUENCE Project") is an EU-funded project pioneering the development of advanced voice/chatbot technologies aimed at transforming unstructured dialogues into comprehensible, safe, and unbiased interactions.

The focus is on creating self-learning, adaptable models for diverse languages and use cases, emphasizing sustainability and European values, especially in safety-critical applications.

The ELOQUENCE project has received funding from the European Union's Horizon 2020 Research and Innovation Action under grant agreement No 101135916.

The ELOQUENCE project started on 01/01/2024 and has a duration of 36 months.

#### **Research aspects**

In cultural theories, social order is established through shared knowledge and practices shaped by cultural values. These structures allow people to interpret the world and act accordingly. To interact correctly, people need to recognise social norms and expectations. However, social biases are often present in data used to train language models. Even when open datasets take these biases into account, we still need to assess their impact.

To address this issue, the Research performed in the ELOQUENCE Pilot 2, "Social context-aware language model detecting biases", will harvest open-source data to assess language models' compliance with social expectations. The project will evaluate sentence construction and social biases. Multilingual scenarios (English-Italian) will test the model's ability to produce socially acceptable utterances. These scenarios will focus on social practices where cultural, racial, and gender aspects may play a role. The pilot will evaluate how the model performs in different situations and create linguistic resources and methods to assess the model's utterances in various social situations.

Your answers will assist the Partners in performing their research activities, testing and validating the ELOQUENCE outputs. As a result, you may be able to rely on a data privacy governance platform that answers to your organisational needs and/or your expectations as an end-user. Participation is entirely voluntary and does not involve financial compensation. Potential disadvantages or risks of participating in the research activities, testing and validations of the ELOQUENCE outputs are kept to a minimum. You will have the right to withdraw from the research activities, testing, and validations at any time during the ELOQUENCE Project.

#### **ELOQUENCE Project Partners**

In the following table, you can find information about the ELOQUENCE Consortium.

Participant No.	Participant organisation name	Country
1	TELEFONICA INNOVACION DIGITAL SL	ES
2	CONSIGLIO NAZIONALE DELLE RICERCHE	IT
3	BARCELONA SUPERCOMPUTING CENTER CENTRO NACIONAL DE SUPERCOMPUTACION	ES
4	FONDAZIONE BRUNO KESSLER	IT
5	UNIVERZITET U NOVOM SADU FAKULTET TEHNICKIH NAUKA	RS
6	EUROPEAN UNIVERSITY INSTITUTE	IT
7	VYSOKE UCENI TECHNICKE V BRNE	CZ

#### Table 1: ELOQUENCE Consortium.



# eloquence

8	PRIVANOVA SAS	FR
9	INOSENS DOO NOVI SAD	RS
10	TRANSFORMATION LIGHTHOUSE, POSLOVNO SVETOVANJE, D.O.O.	SI
11	GRANTXPERT CONSULTING LIMITED	СҮ
12	OMILIA MONOPROSOPI ETAIREIA PERIORISMENIS EFTHYNIS PAROXIS PLIROFORIKON, TILEPIKOINONIAKON KAI FONITIKON YPIRESION KAI SYSTIMATON	EL
13	SYNELIXIS LYSEIS PLIROFORIKIS AUTOMATISMOU & TILEPIKOINONION ANONIMI ETAIRIA	EL
14	FONDATION DE L'INSTITUT DE RECHERCHE IDIAP	СН
15	BRUNEL UNIVERSITY LONDON	UK
16	UNIVERSITY OF ESSEX	UK

#### **ELOQUENCE** Project contact details

Table 2: ELOQUENCE Project contact details

Project Coordinator	Scientific Coordinator	ELOQUENCE Pilot 2 Contact
Jordi Luque Serrano	Alessio Brutti	Agnese Augello
TELEFONICA INNOVACION DIGITAL SL jordi.luqueserrano@telefonica.com	FONDAZIONE BRUNO KESSLER alessio.brutti@fbk.eu	CONSIGLIO NAZIONALE DELLE RICERCHE agnese.augello@icar.cnr.it

#### About the participant

In the event you would like to Participate in the ELOQUENCE Project, please provide us with the following information, which will be processed in accordance with the below Information Sheet (the "**Privacy Policy**"):

First name	 	 
Last name	 	 
Organisation	 	 
Title/function	 	 
Email address	 	

#### **Participation & Consent**



#### Table 3: Template of the Participation & Consent Form

I volunteer to participate in the Research described above, which is conducted in the context of the ELOQUENCE Project.	Yes	No 🗆
I understand that my participation is voluntary (my choice).	Yes	No 🗆
I understand that I will not receive any financial compensation for my participation.	Yes	No 🗆
I am aware that I have the right to withdraw from the Research at any time in the ELOQUENCE Project.	Yes	No 🗆
I understand that participation may involve being interviewed by researchers and members of the ELOQUENCE Project and that I may be recorded during such interview.	Yes	No 🗆
I have read and understood the explanation provided to me about the ELOQUENCE Project.	Yes	No 🗆
I have read and understood the Privacy Policy and I consent to the processing of my personal data as described in the Privacy Policy (see underneath).	Yes	No 🗆
I agree to have my role and/or organisation mentioned in the reports, including public reports, to be submitted to the European Commission and published online.	Yes	No 🗆
I have had all my questions answered to my satisfaction.	Yes	No 🗆
I know who to contact if I have any question about the ELOQUENCE Project and my privacy.	Yes [	No 🗆
I have been given a copy of this informed participation and consent form.	Yes	No 🗆
First name		
Last name		
Signature		

Date

\_\_\_\_ City / Town \_\_\_\_\_

# 10.3 Information Sheets 10.3.1 Information sheet – TID

### **Privacy policy**

1. OUR PRINCIPLES

At Telefónica we are committed to respecting the privacy, secrecy and security of the personal data of our employees, customers and suppliers.



Our approach to respecting and protecting the privacy of the personal data that we try to extend beyond the legal requirements of compliance. It is our top priority, part of our DNA, and so we reflect on the principles that govern our policies in the areas of privacy and security.

This Privacy Policy sets out the guiding principles and the way in which your Personal Data data is collected, used and otherwise processed in the context of the EU ELOQUENCE Project funded under the H2020 research programme, contract no. 101135916 (hereafter the "Project") by Telefónica Digital Innovation, SL

For more information about the procedures that underpin this Policy, please contact jordi.luque@telefonica.com

- We are 100% transparent about the data we collect and/or try to. Here, we'll explain why we use and for what purposes. We will treat your data in a way unexpected, dark, or abusive.
- You are the only one that can control the use that it makes of your personal data. We put at your disposal the tools for you to exercise your rights.
- We are concerned about ensuring the security, privacy and the confidentiality of your data and information. We adopt robust security measures to prevent loss, alteration, misuse, or unauthorized access.

These principles are the gather, in detail, in the following sections of this Privacy Policy applicable to the EU ELOQUENCE Project.

We encourage you to read this Privacy Policy carefully. In it will inform you about everything you need to keep you in control over your data when you participate with us through the Project (hereinafter, the "User" or "Users").

#### 2. Who is Telefónica Digital Innovation?

It is a Group company Telefonica in Spain, responsible for promoting the innovation and development of digital products and services.

Its corporate name is: TELEFÓNICA DIGITAL INNOVATION, SL, a company with identification number B-83188953y registered office in Ronda de la Comunicación s/n, Edificio Central, 28050, Madrid, Spain.

Then, define it as "Telefónica" or "us".

3. Who is the responsible for the processing of the data?

TELEFÓNICA DIGITAL INNOVATION, SL is the company of the Telefónica Group responsible for the processing of your personal data as a User of the Project, in accordance with which we inform you in this Privacy Policy.

For any query, request or complaint in connection with the content of this Privacy Policy and the treatment that we make of your data, you can contact us by writing to jordi.luque@telefonica.com.

4. What data is processed, with what purpose and why we process data?

#### Data we process about you

As a user of the Project, we try different data on it and with different purposes on the appropriate legal basis, either:

i. because these purposes are necessary on the basis of the implementation of the Conditions of the Project, accepted by the User at the time of registration, and that they constitute a legal relationship between the User and us with respect to which this Privacy Policy forms an integral part;



ii. because we pursue legitimate interests properly weighted so it will not affect your rights and freedoms, and in line with these; or

iii. because we are implementing certain legal obligations which require us to treat data about you as a result of your involvement in the Project. In any other case, we will obtain your consent to the processing of your data for a particular purpose properly informed.

The personal data we treat about you are the following

- <u>Data identifying basic contact and/or professionals</u> such as first name, last name, date of birth, e-mail, telephone, postal address.
- <u>Data relating to your participation in the Programs that you sign up:</u> may be personal data provided by you on the registration form to the Program and/or during your participation in the same.
- <u>Image and/or voice:</u> in those events that you specify is possible that you make audiovisual recordings and/or voice of the participants during their participation in the Project.
- <u>Data relating to questions, queries, support</u>, suggestions, and/or other contacts.
- <u>Statistical data of the use and interactions of the user</u>, as well as data relating to your device and/or connection with the access of the web: metadata, connection, as well as information that we have been able to get through to the use of cookies and similar technologies (SDKs, pixels, tags, beacons, etc).

Origin and provenance of your data

In general, these data will be obtained either directly from you when you register, and you are participating in a Program available at our Website, or when you get in touch with us by any means and provide us the data that are required and others are volunteers; or rather, we will be able to generate or capture automatically during the use of our Website.

In this case, all the information that you provide must be truthful and accurate. For these purposes, you guarantee the authenticity of all the data that you provide as a result of the completion of the appropriate forms. The User shall be solely responsible for any false or inaccurate statements made and any damages caused to Telefónica, or to third parties by the information provided.

In the event of submission of false data, or that do not correspond with the User, Telefónica reserves the right to cancel the User's participation in the Programs and/or adopt the measures they consider appropriate for the better defence of their interests and rights, or those of third parties that may be concerned as a result of the above.

Telefónica reserves the right to verify the information provided by the User through any appropriate means, for the purposes of monitoring and/or verification that appropriate, depending on the state of the art in every moment, and which is most appropriate for the protection of the interests and rights of the parties involved.

Purposes we pursue and the reasons that we treat your data

The purposes for which we treat your data as a User are the following:

i. Participation in the Project: on the basis of the execution of the terms and Conditions applicable to the Telefónica's pilot in the EU ELOQUENCE in which you enroll, we will process your data for the purpose of managing your participation, under the terms defined in the relevant terms and Conditions, as long as you keep your status as a participant and not to ask for the floor.

The above, while not to ask for the withdrawal from the Program



ii. Communications of interest - we may send you informational material of the Project using the media informed.

The above, while not cancel the Program

- iii. Management and response to the claims, demands, complaints and disputes about the Project: on the basis of our legitimate interest associated with the right to effective judicial protection that we cover, we may process your data to manage, respond and intervene as an interested party, or similar administrative or judicial proceedings, when of the same, in any way, relate to you or relate to you in the condition that appropriate.
- iv. Compliance with applicable standards and care requirements, and crafts made by the authorities: in general, as any actor is a provider of services of the information society and is responsible for the data processing, we apply various legal obligations, including obligations in the field of consumption, data protection and data security, services and digital markets, as well as in terms of collaboration required with the relevant authorities, including the bodies and security forces. On the basis of the foregoing, we may need to process your data to comply with such obligations as, for example, to respond to the exercise of data protection rights we receive, or to respond to trades or requirements legitimate that we notify and require, for example, provide some information about yourself.
- v. Attention and response to queries, suggestions, and any other contact type received: based on our legitimate interest in managing and responding effectively to the application or contact of another type performed by a User, as well as the extent necessary for the execution of measures pre-contractual at the request of the User for the acceptance of General terms and Conditions or the Legal Bases, we will be able to deal with the data of the person who gets in touch with us to give an effective response in function of the contact that you have made, meet the tip to correct or improve the service of the Web Pages in the sense raised or, in your case, report on the commercial terms of the programs and requests, and to enter into a contractual relationship for the purpose.
- vi. Statistical analysis: on the basis of our legitimate interest to measure the quality of the developed Project as well as to understand how they are used by users, we may perform statistical analyses appropriate data of participation in the Project for the purposes of: (1) to measure the quality of the Project or service and, in the case of degradation, to adopt the measures necessary to prevent and/or remedy such degradation; and (2) to make better business decisions regarding the future evolution of the Project, as well as improvements or corrections evolutionary, in your case, you need to be conducted to provide an adequate experience.

#### 5. How long is data retained?

In general, we will retain your data for the period necessary to comply with each of the purposes described in each treatment activity and to determine the possible responsibilities that may arise from said purpose and/or treatment.

Personal data associated to the purposes of the processing informed	Deadlines or criteria of conservation of your personal data
Participation of the Programs available on our website	The data will be kept for the duration of the Program and/or while not processing your floor.
Communications of interest – email	The data will be kept while not processing your floor.
and disputes about our Programs	By the time necessary for the possible treatment of the responsibilities that may arise during the processing of the data, in accordance with the applicable regulations, and may not be used for purposes other than these.
Compliance with applicable standards and care requirements, and crafts made by the authorities.	While we are obliged to their conservation in fulfillment of a legal obligation.



for recruitment, doubts, queries, suggestions, and any other contact type received.	By the time essential to care properly to your requests and/or specific requests according to each case. If the same, consist in the execution request yours of measures pre-contractual, or the signing of a contract with Telefónica, your data will be kept for the time necessary to give due satisfaction to such measures pre-contractual or contractual relationship between the parties.
Statistical analysis.	We will process your personal data for this purpose while you are not opposite to the processing based on the legitimate interest of Telefónica and provided that such objection is addressed in attention to the circumstances that you communicate. However, even if you are not opposed to this treatment, only we will retain your data for this purpose for a maximum period of 48 months from collection.

Once the retention schedule as indicated, we will proceed to block your personal data during the limitation period for legal actions, and, after such term, we will proceed to the final suppression pursuant to the applicable rules, and/or its anonymization.

#### 6. Who is the recipient of the data? Are there any international transfers of data?

## THIRD PARTIES WHO MAY ACCESS, RECEIVE, AND PROCESS YOUR DATA

In general, to run the purposes of processing as described above, we may use subcontractors authorized to act for the account and name of the Telefónica, in the quality of managers of treatment (e.g. providers of internet services and software development, hosting of data, and technical support, e-mail service providers, suppliers of general services and security services digital or physical, etc), and subjects that are contractually to our instructions, only to the extent that is strictly necessary for the provision of the contracted services with the same and during the period of time strictly necessary to do so.

Also, we inform you that, to the extent that is strictly necessary to fulfill the purposes stated in the Project, your data may be shared with other companies or entities belonging to or connected with the Telefónica Group, to their treatment under the responsibility of these and always with the same purposes stated in the Project and in this Policy. The companies or entities belonging to or connected with the Telefónica Group to which you will be able to share your data can be found in the section "about Telefónica", "about the Company" available on web page www.telefonica.com.

In addition, in the event that there is an obligation or legal requirement that you provide, we may communicate your data to the competent public authorities, pursuant to such obligation or legal requirement and, in your case, similarly to other bodies such as Forces and State Security agencies and judicial bodies.

#### INTERNATIONAL TRANSFERS OF YOUR DATA

When the subcontractors are authorized to act on behalf of the Telefónica or such recipient is located, or process your data outside the European Economic area, we will do an international transfer of your data in accordance with the data protection legislation applicable.

In general, we will avoid the international transfers of data and your data shall be processed within the European Economic area. However, in the event that any such international transfers are necessary, we will take appropriate organizational, contractual and technical measures to ensure the protection and security of your data, as, for example, to sign the standard Contractual Clauses of the European Commission with the subcontractor, authorized or the third party recipient, to conduct impact assessments on the international transfer relevant to assess the risk and take



measures to mitigate it. the encryption of data in transit or at rest, the seudonimización of data transferred, the possibility that the party claiming damages directly against the subcontractor, authorized or the recipient, third party, etc

In any case, we are at your disposal in the mail for the exercise of rights reported in section 6 of this Policy, and through which you can get more information about the guarantees and measures implemented and provided in the applicable regulations.

## 7. What rights do you have as an interested?

Your rights

As a User, the data protection regulations gives you certain rights over your data, as may be applicable, you will be able to exercise in front of Telefónica. Below, we detail what they are and how you can exercise them.

In addition, we inform you that on the website of the Spanish Agency of Protection of Data (<u>www.aepd.es</u>) you can enlarge information on the characteristics of these rights and to download templates for exercise each one of them, although it is not necessary to use any template to exercise a right in front of us.

Rights	What is this right?	
The right to withdraw the consent granted	It's your right to withdraw your consent given for the processing of your data for the purposes that are legitimized on this basis, at any time and an easy way.	
Right of access	It is your right to obtain the rectification of your data being rendered inaccurate or erroneous, as well as to complete those that are incomplete.	
Right to rectification	It is your right to obtain the rectification of your data being rendered inaccurate or erroneous, as well as to complete those that are incomplete.	
Right to erasure	It is your right to request the removal or deletion of your data and information in certain circumstances. However, keep in mind that there are certain occasions in which we are legally entitled to continue to conserve and trying your data as, for example, for the fulfilment of a legal obligation to retain such data.	
Right of limitation	It is your right to restrict or limit the processing of your data in certain circumstances. For example, if you apply the deletion of data, but, instead of eliminating them, you would prefer that the block and try to only for the purpose of their conservation since you're going to need them later to make a claim. Again, keep in mind that there may be occasions in which we are legally entitled to refuse your request for limitation.	
Right of opposition	It is your right to oppose to that we treat your data for a particular purpose, in certain circumstances set out in the regulations, and related to your personal situation.	
Right to portability	It is your right to request to receive your personal data in a structured format, commonly used, machine-readable and interoperable, and able to transmit them to another controller whenever the processing of your data by us by automated means.	
Right not to be subject to automated individual decisions	It is your right to ask us, in certain circumstances, not be subject to a decision based solely on automated processing of your data, including profiling, which produces legal effects on you or affects you significantly in a similar way.	

Means to exercise and response times



In general, you can exercise these rights at any time and free of charge by Telefónica at <u>jordi.luque@telefonica.com</u>. In the same way and with a general nature, shall be available to the User mechanisms of low automated communications, and other options of withdrawal of consent and objection.

To do this, it is important to note that, when you practice a right, in some of the cases, you need to clearly specify what you exercise and providing a copy of a document with proof of your identity. It is also necessary to indicate that some of the treatments of data are carried out by Telefónica in a way that does not require the direct identification of the Users, without that Telefónica is required to obtain and/or treated for additional information to verify the User for the purpose of enabling the exercise of your data protection rights.

In the event that a User wishes to exercise a right to data protection and, due to the reasons indicated, Telefónica is not in a position to identify you to meet the request, we will inform such effect in the case of being possible. Such application shall be suspended until the User provides additional information that is personally identifiable.

Any exercise of the right will be answered within a maximum period of one month, and may this period be extended by two months in case you need it in a reasoned manner, taking into account the complexity of the request and the number of them.

Finally, in the event that you are not according to the way in which we treat your data by Telefónica, you will have the right to submit a complaint to the national supervisory authority, speaking to the Spanish Agency of Data Protection (AEPD), whose contact details are the following:

Spanish agency of Protection of Data, C/ Jorge Juan, 6 – 28001 Madrid www.aepd.es

We recommend that before submitting any complaint or claim with the Spanish Agency for Data Protection (AEPD), contact our Data Protection officer in order to analyze the specific situation appropriate, and try, in your case, to find a solution efficient and friendly. Apart from the above, if you want, you could also refer to the AEPD.

8. Further processing of data and changes of the privacy Policy

Telefónica reserves the right to update this Privacy Policy at any time. This update was made public by Telefónica, in any case, with the notice of its entry into force that are legally required.

In addition, it will be directly communicated to the User in the event that the same affect your rights or freedoms or that when, for example, the inclusion of a new activity treatment requires a User's consent or change the scope of the legitimate interest that enables the treatment.

# 10.3.2 Information sheet – UNS

# INFORMATION SHEET (PRIVACY POLICY)

1. Scope of this policy

This information sheet (hereafter "**Privacy Policy**") describes how your personal data is collected, used and otherwise processed in the context of the EU ELOQUENCE Project funded under the H2020 research programme, contract no. 101135916 (hereafter the "**Project**").

This Privacy Policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.



In this Privacy Policy:

- "We" or "us" refer to the Partners of the ELOQUENCE Project listed in Section I.3. of the Informed Consent above, who will process your personal data as data controllers and as described herein. The Project Partners can be contacted collectively through the contact details provided in Section I.4., and notably by sending an email to <u>pdpeloquence@uns.ac.rs</u>.
- "Data Protection Legislation" means the Regulation 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 (the "GDPR"), as well as any legislation and/or regulation implemented or created pursuant to the GDPR and the e-Privacy legislation, or which amends, replaces, re-enacts or consolidates any of them, and all other national applicable laws relating to processing of personal data and privacy that may exist under applicable law.
- The terms "controller", "processor", "third party", "supervisory authority", "personal data", "processing", "data subject", shall have the meanings set out in the applicable Data Protection Legislation.

#### 2. What personal data is processed?

In the context of the Project, your personal data is processed by the Partners, as follows:

- **Processing purpose(s):** for the purpose of carrying out the research in the ELOQUENCE Project, as described in Section I above.
- **Processed data categories:** first name, last name, organisation, title / function, email address, any information you decide to share with us through discussions, interviews, correspondence and questionnaires, sound and/or video recordings (where applicable)
- **Source of data:** from you, directly through the participation form, discussions, interviews, correspondence and questionnaires.
- Legal basis: Your consent, as provided in Section III. You may withdraw that consent at any time you choose and at your own initiative by contacting us at <a href="mailto:pdpeloquence@uns.ac.rs">pdpeloquence@uns.ac.rs</a>. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

Organisatio n (data processor)	Processed data categories	Instructions
UNS first name, last name, organisation, title / function, en address, any information you decide to share with through discussions, interviews, correspondence a questionnaires, sound and/or video recordings (who applicable)		Provision of software for file hosting services
EU Survey	first name, last name, organisation, title / function, email address, any information you decide to share with us through questionnaires	Provision of survey tool allowing for the creation and sending of Research questionnaires.

We rely on the following organisations to process your personal data:

3. How long is your personal data stored?

If immediate deletion will not occur, that means we have a legal obligation and/or a research purpose to archive the data either for contractual reasons or for scientific research finalities. In such case, UNS will retain the personal data in question for a maximum of three years from the termination of the project, unless otherwise indicated or requested by a supervisory authority or for auditing purposes.



#### 4. How is your personal data shared with third parties?

No personal data will be disclosed to any third-party (i.e. non-consortium entities) unless there is an explicit authorization to do so by the interested individual or a contractual obligation to be fulfilled. Your personal data will be shared with government authorities and/or law enforcement officials if mandated by law or if required for the legal protection of the data controller(s) legitimate interests in compliance with applicable laws.

#### • Is your personal data transferred outside the European Economic Area (EEA)?

We do not intend to transfer the data that we collect from you to a destination outside the EEA. Should this however become the case we will put in place appropriate safeguards to ensure that such transfers comply with Data Protection Legislation including the GDPR. Please note that the data processors listed under Section 2 of this Privacy Policy may store or transfer your personal data outside the EEA. In such event, we will verify that the appropriate safeguards to ensure adequate protection of your data are in place (particularly those that are laid down by the Chapter V of the GDPR).

• What are your rights?

If you, as a data subject, believe that any of your personal data are processed by UNS as part of our research activities in ELOQUENCE project, you are entitled to request the controller to undertake the following actions:

- Right to withdraw your consent: you may withdraw your consent at any time you choose and at your own initiative by contacting us at <u>pdpeloquence@uns.ac.rs</u>. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.
- **Right to access.** Data subjects are entitled to request information regarding their personal data, including purposes, categories of information, recipients, retention, source of collection, transfer to third-countries (non-EU Member States). Moreover, the data subject is entitled to receive a copy of such data.
- Erasure or rectification. Data subjects may request at any time for their personal data to be amended, updated or erased by the controller.
- **Restriction of processing.** Data subjects have the right to request that their data are suspended from being processed, anytime the data results to be inaccurate or unlawfully or unnecessarily processed.
- **Portability.** Data subjects shall have the right to receive their personal data in a machine-readable format, anytime they wish to transfer such data to another controller representing a similar service.
- **Right to object.** Data subjects have the right to object to the processing of their personal data anytime they demonstrate grounds relating their particular situation, unless the processing is conducted on public interest grounds and pursuant to Article 89(1).
- Protection against automated decision-making or profiling. Data subjects have the right not to be subjects to automated decision-making processes (including profiling).

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to lodge a complaint with an EU data protection authority where you live, work or where you believe a breach may have occurred.

• What security measures are put in place?

Appropriate technical and organisational measures are implemented in order to ensure an appropriate level of security of your personal data.



In the event personal information is compromised as a result of a security breach and where the breach is likely to result in a high risk to your rights and freedoms, we will make the necessary notifications, as required under the Data Protection Legislation.

• How can we be contacted?

Questions, comments, remarks, requests or complaints regarding this Privacy Policy are welcome and should be addressed to: <a href="mailto:pdpeloquence@uns.ac.rs">pdpeloquence@uns.ac.rs</a>.

# 10.3.3 Information sheet - CNR

# Scope of this policy

This information sheet (hereafter "Privacy Policy") describes how your personal data is collected, used and otherwise processed in the context of the Pilot2 in the ELOQUENCE Project.

This Privacy Policy includes a description of your data protection rights, including a right to object to some of the processing activities we carry out.

In this Privacy Policy:

- "We" or "us" refer to the Partners of the ELOQUENCE Project listed in Section 6.2.1.1.3. above, who will process your personal data as data controllers and as described herein. The ELOQUENCE Project Partners can be contacted collectively through the contact details provided in Section 6.2.1.1.4, and notably by sending an email to agnese.augello@icar.cnr.it.
- "Data Protection Legislation" means the Regulation 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 (the "GDPR"), as well as any legislation and/or regulation implemented or
  created pursuant to the GDPR and the e-Privacy legislation, or which amends, replaces, re-enacts or
  consolidates any of them, and all other national applicable laws relating to processing of personal data and
  privacy that may exist under applicable law.
- The terms "controller", "processor", "third party", "supervisory authority", "personal data", "processing", "data subject", shall have the meanings set out in the applicable Data Protection Legislation.

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#### What personal data is processed?

In the context of the ELOQUENCE Project, your personal data is processed by the Partners, as follows:

- **Processing purpose(s)**: for the purpose of Participating in the Research, testing and validation activities of ELOQUENCE Project, as described in Section 6.2.1.1 above.
- **Processed data categories**: first name, last name, organisation, title/function, email address, any information you decide to share with us through discussions, interviews, correspondence and questionnaires, data providing performance, satisfaction, and motivation feedback from participants' point of view, sound and/or video recording (where applicable).
- Source of data: from you, from discussions with the research team of the ELOQUENCE project, from initial assessment, your interaction with the ELOQUENCE products, measurement/observations of your interactions, interviews, correspondence and questionnaires and from processed data providing performances and satisfaction.
- Legal basis: Your consent, as provided in Section 6.2.1.3. You may withdraw that consent at any time you choose and at your own initiative by contacting us at agnese.augello@icar.cnr.it. The withdrawal of your



consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.

We rely on the following organisations to process your personal data:

Organisation data processor	Processed data categories	Instructions
CNR	first name, last name, organisation, title / function, email address, any information you decide to share with us through discussions, interviews, correspondence and questionnaires, sound and/or video recordings (where applicable)	Provision of software for file hosting services
EU Survey	first name, last name, organisation, title / function, email address, any information you decide to share with us through questionnaires	Provision of survey tool allowing for the creation and sending of Research questionnaires.

## How long is your personal data stored?

We retain your personal data for the duration of the ELOQUENCE Project (i.e. until 31 December 2026) or for a shorter period as long as your data are required to fulfill the activities set out in the Participation Form and this Privacy Policy. After such period your personal data may be archived, where possible in anonymised format, in accordance with applicable legal requirements. We may also retain your personal data if it is reasonably necessary to comply with any legal obligations, meet any regulatory requirements, resolve any disputes or litigation, or as otherwise needed to enforce this Privacy Policy and prevent fraud and abuse.

To determine the appropriate retention period for the information we collect from you, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of the data, the purposes for which we process the personal data, and whether we can achieve those purposes through other means, and the applicable legal requirements.

#### How is your personal data shared with third parties?

We only share or disclose information as described in the Participation Form and this Privacy Policy, including with third parties. Your personal data will also be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if required for the legal protection of the data controller(s) legitimate interests in compliance with applicable laws.

# Is your personal data transferred outside the European Economic Area (EEA)?

We do not intend to transfer the data that we collect from you to a destination outside the EEA. Should this however become the case (e.g. as a result of Brexit), we will put in place appropriate safeguards to ensure that such transfers comply with Data Protection Legislation, either by putting in place Standard Contractual Clauses approved by the European Commission as ensuring an adequate protection or by ensuring that the transfer is done to an organisation that complies with Privacy Shield in case the transfer is made to the United States of



America. Please note that the data processors listed under Section **¡Error! No se encuentra el origen de la referencia.** of this Privacy Policy may store or transfer your personal data outside the EEA. In such event, we will verify that the appropriate safeguards to ensure adequate protection of your data are in place.

#### What are your rights?

Once you have provided your personal data, several rights are recognized under the Data Protection Legislation, which you can in principle exercise free of charge, subject to statutory exceptions. In particular, you have the following rights:

- **Right to withdraw your consent**: you may withdraw your consent at any time you choose and at your own initiative by contacting us at agnese.augello@icar.cnr.it. The withdrawal of your consent will not affect the lawfulness of the collection and processing of your data based on your consent up until the moment where you withdraw your consent.
- Right to access and rectify your data: you have the right to access, review, and rectify your personal data. You may be entitled to ask us for a copy of your information, to review or correct it if you wish to review or rectify any information. You may also request a copy of the personal data processed as described herein by sending an email to agnese.augello@icar.cnr.it. You can access and review this information and, if necessary, ask to rectify your information.
- **Right to erasure**: you have the right to erasure of all the personal data processed by as described herein in case it is no longer needed for the purposes for which the personal data was initially collected or processed, in accordance with the Data Protection Legislation.
- **Right to object or restriction of processing**: under certain circumstances described in the Data Protection Legislation, you may ask for a restriction of processing or object to the processing of your personal data.
- **Right to data portability**: under certain circumstances described in the Data Protection Legislation, you have the right to receive the Personal Data processed in a format which is structured, commonly used and machine-readable and to transmit this data to another service provider.

These rights may be limited, for example if fulfilling your request would reveal personal data about another person, or if you ask us to delete information which we are required by law to keep or have compelling legitimate interests in keeping.

To exercise any of these rights, you can get in touch with us using the details set out below. If you have unresolved concerns, you have the right to lodge a complaint with an EU data protection authority where you live, work or where you believe a breach may have occurred.

#### What security measures are put in place?

Appropriate technical and organisational measures are implemented in order to ensure an appropriate level of security of your personal data.

In the event personal information is compromised as a result of a security breach and where the breach is likely to result in a high risk to your rights and freedoms, we will make the necessary notifications, as required under the Data Protection Legislation.

#### How can we be contacted?

Questions, comments, remarks, requests or complaints regarding this Privacy Policy are welcome and should be addressed to: agnese.augello@icar.cnr.it.



# NON-DISCLOSURE AGREEMENT

This **NON-DISCLOSURE AGREEMENT ("NDA")** is for the ELOQUENCE Consortium's External Advisory Group and it is entered into by and between

TELEFONICA INNOVACION DIGITAL SLU (TinD), a corporation validly organized and existing under the laws of Spain, having its principal place in Gran Via 28, Madrid, 28013 ("Coordinator"), on behalf of the members of ELOQUENCE Consortium (each ELOQUENCE Member", together "ELOQUENCE Members");

and;

# [EAB member name], [email address] ("EEAB Member")

hereinafter referred individually to as "Party" or together as "Parties" respectively

## WHEREAS:

(a) ELOQUENCE Members have elected to institute a special External Expert Advisory Board (EEAB).

(b) For the purpose of participation of the EEAB Member in the ELOQUENCE External Advisory Group (hereinafter "Purpose"), ELOQUENCE Member(s) may, in conjunction with the Purpose disclose to the EEAB Member Confidential Information which the ELOQUENCE Member regards as confidential and the EEAB Member is willing to undertake to restrict the use and further disclosure of such Confidential Information.

# NOW THEREFORE IT IS HEREBY AGREED:

- 1. "Confidential Information" shall mean any proprietary information received by the EEAB Member from a ELOQUENCE Member whether orally, in writing, or in electronic or any other form.
- 2. The EEAB Member hereby undertakes from the date of signature and until [six years] after the end of ELOQUENCE to a. keep strictly confidential all Confidential Information received by it hereunder with the same degree of care as is used with respect to the EEAB Member's own equally important confidential information to avoid disclosure to any third party, but at least with reasonable care, and neither disclose Confidential Information received by it hereunder to third parties nor use it for any purpose other than the above-mentioned Purpose without the prior written permission of the disclosing Party.

The EEAB Member shall not, except as and to the extent required to enable it to carry out the Purpose, make any copies or reproduce the disclosed Confidential Information except copies of electronically exchanged Confidential Information made as a matter of routine information technology backup (cf. Section 6 below). Such copies or reproductions shall be subject to the terms of this NDA. The EEAB Member shall take such steps as are reasonably necessary to restrict access to and protect the confidentiality of such copies or reproductions of the NDA.

- 3. The foregoing obligations shall not apply to any Confidential Information which
  - a. is in the public domain at the time of disclosure or later becomes part of the public domain through no fault of the EEAB Member; or
  - b. was known to the EEAB Member prior to disclosure hereunder without any obligation of confidentiality to the disclosing Party, as proven by the written records of the EEAB Member; or



- c. is disclosed to the EEAB Member by a third party who, to EEAB Member's best knowledge, is in lawful possession thereof and under no obligation of confidentiality to the disclosing Party or any other third party; or
- d. was developed by the EEAB Member completely independently of any disclosure of Confidential Information hereunder as proven by the written records of the EEAB Member.

The EEAB Member may disclose Confidential Information received hereunder if the EEAB Member is required to do so by any final ruling of a governmental or regulatory authority or court or by mandatory law, provided that written notice of such ruling is given without undue delay to the disclosing Party so as to give the disclosing Party an opportunity to seek a protective order or equivalent or to obtain a written assurance from the competent judicial or governmental entity that it will afford the Confidential Information the highest level of protection afforded under the applicable law or regulation, and provided further that the EEAB Member uses reasonable efforts to obtain assurance that the Confidential Information will be treated confidentially. Confidential Information which is disclosed in such a manner must be marked "Confidential".

- 4. The EEAB Member shall not make any publicity on, press release of or any reference to this NDA, to the ELOQUENCE Members or Confidential Information received hereunder:
- 5. This Confidentiality Undertaking shall come into force upon signature by the EEAB Member and the Coordinator.
- 6. The disclosing Party may at its discretion request at any time in writing from the EEAB Member that the EEAB Member either return or destroy all Confidential Information received from such disclosing Party and stored electronically and/or on record-bearing media as well as any copies thereof. The EEAB Member shall confirm in writing such destruction or return the Confidential Information as well as any copies thereof to the disclosing Party within fourteen (14) days after receipt of the disclosing Party's request.

The provisions of Article 6 para. 1 hereof shall not apply to copies of electronically exchanged Confidential Information made as a matter of routine information technology backup and to Confidential Information or copies thereof which must be stored by the EEAB Member according to provisions of mandatory law, provided that such Confidential Information or copies thereof shall be subject to an indefinite confidentiality obligation according to the terms and conditions set forth herein.

- 7. No license to the EEAB Member, under any trademark, patent, copyright or any other intellectual property right is either granted or implied by the conveying of Confidential Information to the EEAB Member. None of the Confidential Information disclosed shall constitute any representation, warranty, assurance, guarantee or other inducement to the EEAB Member of any kind, and, in particular, with respect to the non-infringement of trademarks, patents, copyrights or any other intellectual property rights, or other rights of third parties.
- 8. This NDA may not be modified or amended except by written amendments duly executed by the Parties. This requirement of written form can only be waived in writing.
- 9. This NDA shall be construed and interpreted in accordance with the laws of Belgium, excluding its rules for choice of law.

Each Party shall be entitled to seek necessary and appropriate injunctive relief or any other temporary measures from the courts of competent jurisdiction to enjoin the other Party from taking certain actions which may infringe on the rights of the Party bringing such claim, provided that any proceedings and



decisions as to the merits of the dispute, including permanent injunctions, are exclusively governed and resolved by arbitration in accordance with the first paragraph of this Article 10.

All disputes directly arising under this NDA, which cannot be settled amicably, shall be subject to the jurisdiction of the competent court in Brussels, Belgium.

The foregoing shall be without prejudice to the right of any ELOQUENCE Member to seek injunctive relief or other non-monetary relief before any court in any place where any unauthorised use of its Confidential Information occurs or threatens to occur.

This NDA may be executed in any number of counterparts by either handwritten signatures, including the exchange of scanned representations of handwritten signatures, or e-signatures. By using e-signature to sign this NDA the Parties acknowledge that execution in this manner creates binding contracts between the Parties.

