# Data Protection Notice (updated August 2022)

This data protection notice solely concerns the data processing taking place as part of research activities in the ROXANNE project. The privacy statement regarding processing of personal data taking place for operation of this website can be found <u>here</u>.

## 1. Overview

**The Purpose of Processing: The ROXANNE Project** - We (the ROXANNE Consortium) process personal data to: research speech, text, video, and network analysis software; research the implications of the software; administer the project, including its events; communicate about project research. The aim of the project is to research tools that can support law enforcement agencies (LEAs) in their daily work to combat organised crime.

**Data Controllers: The ROXANNE partners** – The ROXANNE consortium is made up on 25 partners from Europe and beyond. They are:

- Fondation de L'Institut de Reserche IDIAP (CH)
- Trilateral Research Ltd. (UK)
- Vysoke Uceni Technicke v Brne (CZ)
- Phonexia SRO (CZ)
- Hensoldt Analytics (AT)
- Capgemini Consulting (FR)
- The International Criminal Police Organisation (INTERPOL, an international organisation)
- Univrsitat des Saarlandes (DE)
- Kentro Meleton Asfaleias (GR)
- Gottfried Wilhelm Leibniz Universitaet Hannover (DE)
- Universita Cattolica del Sacro Cuore (IT)
- Aegis IT Research UG (Haftungsbeschrankt) (DE)
- Airbus Defence and Space SAS (FR)
- Policejni Prezidium Ceske Republiky (CZ)
- Ministerul Afacerilor Interne (RO)
- Lietuvos Teismo Ekspertizies Centras (LT)
- Police Service of Northern Ireland (UK)
- Aditess Advanced Integrated Technology Solutions & Services Ltd (CY)
- Ministy of Interior (HR)
- Netherlands Forensic Institute (NL)
- Internet of Things Applications and Multi Layer Development Ltd (CY)
- Ministry of Public Security (IL)
- Hellenic Police (GR)
- An Garda Siochana (IE)
- Zentrale Stelle für Informationstechnik im Sicherheitsbereich (DE)

**Your rights as a data-subject** – If your personal data is processed by the ROXANNE partners, you can exercise your rights as a data-subject.

You have the following rights:

• You have the right to access your personal data where the ROXANNE partners process them.

- You have the right to be provided with a copy of your personal data that is processed by the ROXANNE partners.
- You have the right to rectify any inaccurate personal data concerning you that is held by the ROXANNE partners.
- You have the right to request erasure of your personal data ('right to be forgotten').
- You can object to the processing of your data by ROXANNE partners.
- If you believe that your rights have been infringed, you can lodge a complaint with any supervisory authority.
- You have the right to object to automated decision-making. However, the ROXANNE project does not engage in any automated decision-making.

For more details, see Section 10.

**Processing that could have impacts on data subjects** – The ROXANNE partners use openly available datasets from previous research projects to train machine learning algorithms. Therefore, if, in the future, the ROXANNE technologies are used to analyse personal data related to persons whose data was included in those datasets, then there is a slightly higher chance that they will be recognised by those algorithms than if their data was not used to train the machine learning algorithm.

**Processing that could surprise data-subjects** – Personal data processed for the researching of speech, text, video, and network analysis software mostly use datasets from previous research projects where data-subjects consented to their personal data being used for research purposes, or knowingly made their data manifestly public. However, the use of some testing data might not be expected by data-subjects, this includes: testing the software researched by ROXANNE on speech data from a closed criminal case by Lietuvos Teismo Ekspertizies Centras (BALSAS\_LT200, this is with the permission of the Lithuanian State Prosecutor, and the Lithuanian State Data Protection Inspectorate has been notified of this processing). Further, the contact details of people whom the ROXANNE partners believe would be interested in the project have been added to the project's contact list; such persons can unsubscribe at any time by using the link at the bottom of each email they receive.

**Responsible Research** - The ROXANNE project seeks to comply with the tenets of Responsible Research and Innovation and with national and European research ethics requirements in a manner that has been developed in strict compliance with the relevant ethical and legal guidelines, provisions, procedures, and protocols that have been identified by the European Commission and project partners working on ethical and legal compliance. We put particular emphasis on privacy-awareness and legal compliance of the research and development.

**Regulatory Model** - The ROXANNE Consortium has followed a regulatory model with internal and external controls. Within the project, partners leading on ethical, legal, and societal issues analyse the project and implement recommendations to enhance the work of technical and LEA partners from ethics- and privacy-by-design perspectives. All partners work closely with their own Data Protection Officers (DPOs) or legal teams, and, where necessary, national Data Protection Authorities to comply with the data protection requirements. The ROXANNE project is overseen by both an Internal and External Ethics Board who provide advice to partners. Further, the European Commission sets requirements for the project to meet in order to evidence that it is complying with ethical and legal standards that are applicable to research.

**General Data Protection Regulation (GDPR)** - The ROXANNE project will only collect personal data insofar as it is necessary to collect it for the completion of research, validation, dissemination, and exploitation of the project results. The ROXANNE project is a **research project** and to this end,

Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the 'General Data Protection Regulation', hereafter 'GDPR', is the primary basis for the data processing for technology, university, SME and LEA partners.

The GDPR protects the rights of persons whose personal data is processed, called data subjects' rights. These are set out below in Section 11 below.

No partner has any plan to process any personal data within any law enforcement mandate, and so no personal data is expected to be processed under the Law Enforcement Directive (EU) 2016/680.

**Contact Details** - The contact details of the project coordinator and the project ethics adviser are included below; they can be contacted if you have any questions about the processing of personal data in the ROXANNE project. If your personal data is being processed by the ROXANNE project, you can use these details to exercise your rights as data-subjects.

### **Project coordinator:**

Dr. Petr Motlicek: petr.motlicek@idiap.ch.

### Ethics and legal adviser:

Dr. Joshua Hughes: joshua.hughes@trilateralresearch.com

## 2. Consortium and Controllership

The ROXANNE project consists of 25 partners including technical, academic, ethics, legal and LEA organisations from 15 different countries, they are listed above. There is a broad spectrum of activities within the project. These activities include: research about the technological ways to meet the requirements of the LEA stakeholders; research on the ethical, legal, and societal implications of the project itself; research on the relevant ethical, legal, and societal issues for the potential future use of the technologies that are researched by the project, and; communicating and disseminating information about the work of the project. In determining purposes and means of the processing of personal data, the project was informed by all areas of partner expertise. In most cases, partners act as individual data controllers for processing their work in individual tasks. However, partners do collaborate across tasks and where they jointly determine the means and purposes for processing personal data, they are joint data controllers.

The specific tasks involved in the research are defined in a Grant Agreement between the European Commission and the partners. To achieve the technical or other objective of individual ROXANNE tasks, each task leader must further specify the remit and means of data processing. Typically, the data controller undertakes data processing activities. Each partner is responsible on an individual basis for adhering to data protection rules for the data processing activities carried out. This responsibility is exercised with an expectation of support from other project partners.

## 3. Purposes of Processing

The ROXANNE Consortium processes personal data in order to effectively participate in a scientific research project which aims to develop and integrate a range of high-tech approaches, including speech, text, video, and network analysis. The intention is to research beyond-state-of-the-art

technologies to inform future technological development that could then be taken forward for exploitation after the project and provided to LEAs to reduce the time spent on analysing raw data in organised crime investigations.

With this overarching purpose in mind, we process personal data to:

- a) research, train, test and evaluate software models as part of this research activity;
- b) research the ethical, legal, and societal implications of the project and technologies;
- c) organise and administer the project, including its events and field tests, and;
- d) disseminate and communicate the outputs from the project.

The ROXANNE project is strictly a research project and processes data for the above purposes only. The ROXANNE consortium has no intention to monitor any person, or to take decisions against them. Further, there is no processing of data by technical partners on behalf of LEA partners for law enforcement purposes.

## 4. Personal Data and Data Minimisation

Personal data is that which concerns an individual and can be used to identify them. Where actions in ROXANNE process personal data, ROXANNE engages in data minimisation. Data minimisation in ROXANNE will ensure that data is:

- Adequate Meaning it is sufficient to fulfil the stated purpose.
- Relevant Meaning the processing has a rational link to the purpose.
- Limited Meaning that only the necessary data to fulfil the stated purpose is processed.

Partners will follow good governance ensuring that they will only process personal data that is adequate, relevant, and limited to what is needed for their task.

Towards this requirement, the ROXANNE project prefers to process anonymous (non-personal) data. Where this is not possible, partners process pseudonymised personal data. Pseudonymous data, if linked with additional information, has the potential to identify individuals. However, re-identification of pseudonymised data-subject provides no scientific benefit to the project, is not a project aim, and it is, therefore, consortium policy not to attempt re-identification of pseudonymised data-subjects.

Where pre-existing data needed for implementing project tasks has been unavailable, partners have developed 'ROXANNE synthetic data' (ROXSD) where partners created a scenario like a real criminal investigation and recorded all personal data themselves. For this activity, all participants were volunteers who consented to their personal data being collected and processed by the project and the use of human participants was approved by the ethics review board of one of the ROXANNE project's university partners.

Only where necessary do partners process personal data.

## 5. Categories of Personal Data Processed in the Project

The ROXANNE project processes the following types of data for the following purposes:

- Recordings of speech to train and test algorithms for speech analysis tools that recognise characteristics of speakers;
- Text data to train and test algorithms for test analysis tools that recognise information in text, and to analyse the written responses to surveys and questionnaires;
- Metadata to train and test algorithms for network analysis that highlights links between members of social networks (much of this type of data processed in the project is anonymous);
- Contact details of persons in the project contact lists to organise and administer the project and project meetings, and to disseminate project outputs.

The project is engaged in analysis of video and images for object detection, and this activity does not involve personal data. The ROXANNE project is not engaged in researching tools for facial recognition or facial analytics.

# 6. Transparency Regarding the Processing of Personal Data

This data protection notice is intended to meet the requirements of Article 14 GDPR concerning information to be provided to the data subject, especially in cases where personal data has not been obtained from the data subject. Informing data subjects directly of the information listed below would in many cases have a disproportionate effect on the scientific research purpose objective, take disproportionate efforts, or would be impossible, pursuant to Article 14(5)(b).

The ROXANNE project processes the following datasets where data-subjects have not been directly informed due to the expectation that this would take disproportionate efforts, or would be impossible:

The legal basis for the processing of personal data required for research, validation, dissemination, and exploitation activities in ROXANNE varies depending on the form of personal data and the nature of the data controller. This is the case across both the GDPR *and* relevant national law. Although ROXANNE is a research project involving LEAs, and is related to LEA activities, there is no processing of personal data on the basis of national law which implements Directive (EU) 2016/680, the 'Law Enforcement Directive'. The Directive is intended to regulate the processing of personal data for law enforcement activities. As a research project, LEA partners in ROXANNE are not engaging in research as a law enforcement activity.

Datasets from previous research projects:

- <u>CSI Corpus from the University of Edinburgh (video data, speech data, metadata)</u>
- <u>VoxCeleb from the University of Oxford</u> (video data is contained in this dataset, but only speech data is processed from it)
- <u>Speaker Recognition Evaluation Test Set from the US National Institute of Science and</u> <u>Technology (NIST SRE, speech data)</u>
- <u>Call My Net Corpus from the US National Institute of Science and Technology (NIST CMN,</u> speech data)
- FRIDA from the Netherlands Forensic Institute (speech data, not openly available)
- <u>CoNLL-2003 from the University of Antwerp (text data)</u>
- OntoNotes from the Linguistic Data Consortium (text data)
- ACE 2005 Multilingual Training Corpus from the Linguistic Data Consortium (text data)
- Estonian Named Entity Recognition Dataset from the University of Tartu (text data)

Datasets from closed criminal cases:

- BALSAS\_LT 200 (speech data, not openly available)

- CASE 3 (anonymised call data x-vectors, not openly available)
- BURGLARY CASE (anonymised text data embeddings, not openly available)

Data selected by partners for dissemination and communication purposes:

- Entries in the ROXANNE contact list (contact details, not openly available)

Personal data has also been collected by the project from data-subjects on the legal basis of consent. Transparency information was provided to data-subjects on their consent forms. This includes:

- ROXANNE Simulated Data (ROXSD) (speech data, not yet openly available)
- Responses to ROXANNE surveys (text data, not openly available)
- Responses provided at ROXANNE events (text data, not openly available)
- Entries in the ROXANNE contact list (contact details, not openly available)

Where the processing of personal data is based on the consent of the data-subject, data-subjects can withdraw their consent at any time by notifying the project partners using the contact details below (Section 11).

The following table presents the legal basis relied on by partners processing the different categories of personal data. Note that partners who are located outside of the EU are obligated to act as if bound by EU law under the ROXANNE Grant Agreement, and so an equivalent legal basis has been provided for them under EU law in addition to the own national law (or organisational requirements for INTERPOL). Note that datasets that do not contain personal data are not provided here.

Partner	Data type/datasets	Legal basis
Fondation de L'Institut de Reserche IDIAP (CH)	1 1 1	Art.6(1)(a) and Art.9(2)(a), GDPR; Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.
	Speech data (CSI, NIST SRE, NIST CMN)	Arts.5(1)(b) and 6(4), GDPR; Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.
	Text data (CSI, NIST SRE, NIST CMN)	Arts.5(1)(b) and 6(4), GDPR; Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.
	Metadata (CSI, NIST SRE, NIST CMN)	Arts.5(1)(b) and 6(4), GDPR; Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.
	Contact details provided by data-subjects	Art.6(1)(a), GDPR. Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.
	Contact details selected by partners	Art.6(1)(f), GDPR (The legitimate interests pursued here are the effective dissemination of project content to people whom the project partners believe will be interested in it). Arts.4 and 13 Swiss Federal Data Protection act 1992. When in force, Arts.6 and 31 Swiss Federal Data Protection Act 2021 will apply.

Trilatoral Dessarah	Contract datails provided	
Trilateral Research Ltd. (UK)	Contact details provided by data-subjects	Art.6(1)(a), GDPR; Art.6(1)(a), UK GDPR.
	Contact details selected	Art.6(1)(f), GDPR; Art.6(1)(f), UK GDPR (The
	by partners	legitimate interests pursued here are the
	by partices	effective dissemination of project content to
		people whom the project partners believe will
		be interested in it).
	Text Data (Survey	Art.6(1)(a), GDPR, Art.9(2)(a), GDPR.;
	responses)	Art.6(1)(a), UK GDPR, Art.9(2)(a), UK GDPR.
Vysoke Uceni		Art.6(1)(a), GDPR; Art.9(2)(a), GDPR
Technicke v Brne	Speech data (CSI, NIST	Arts.5(1)(b) and 6(4), GDPR; Art.6(1)(a) and
(CZ)		Art.9(2)(a), GDPR; Section 16 of Act No.
(02)	SRE, NIST CMN, VoxCeleb)	110/2019 Coll. of the Czech Republic
Phonexia SRO (CZ)	Speech Data (ROXSD)	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR.
Hensoldt Analytics	Speech data (ROXSD, CSI,	Art.6(1)(f), GDPR; Art.9(2)(j), GDPR; Art.6(1)(a)
(AT)	NIST SRE, NIST CMN)	and Art.9(2)(a), GDPR; Austrian Research
		Organisation Act
		(Forschungsorganisationsgesetz) (The legitimate interests pursued here are those of
		engaging in scientific research).
	Text data (CSI, NIST SRE,	Art.6(1)(f), GDPR; Art.9(2)(j), GDPR; Art.6(1)(a)
	NIST CMN)	and Art.9(2)(a), GDPR; Austrian Research
		Organisation Act
		(Forschungsorganisationsgesetz) (The
		legitimate interests pursued here are those of
		engaging in scientific research).
	Metadata (CSI, NIST SRE,	Art.6(1)(f), GDPR; Art.9(2)(j), GDPR; Art.6(1)(a)
	NIST CMN)	and Art.9(2)(a), GDPR; Austrian Research
	,	Organisation Act
		(Forschungsorganisationsgesetz) (The
		legitimate interests pursued here are those of
		engaging in scientific research).
Capgemini	Contact details provided	Art.6(1)(a), GDPR.
Consulting (FR)	by data-subjects	
	Contact details selected	Art.6(1)(f), GDPR (The legitimate interests
	by partners	pursued here are the effective dissemination of
		project content to people whom the project
		partners believe will be interested in it).
INTERPOL	Text Data (Survey	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR;
(international	responses and feedback	INTERPOL's Rules on the Processing Data, Title 5
organisation)	from stakeholders)	Chapter I.
Univrsitat des	Text Data (CoNLL03;	Arts.5(1)(b) and 6(4), GDPR; Art.9(2)(j), GDPR; §
Saarlandes (DE)	OntoNotes; ACE 2005;	22(2) Saarland Data Protection Act
	Estonian NER Datasets. )	
Kentro Meleton	Text Data (Field-test	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR.
Asfaleias (GR)	feedback)	
Airbus Defence and	Speech data (ROXSD)	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR.
Space SAS (FR)	Casada	
Lietuvos Teismo	Speech data	Art. 6(1)(c), GDPR, GDPR; Art.9(2)(j), GDPR;
Ekspertizies Centras	(BALSAS_LT200)	Art.3(5) and 23, Law on the Forensic
(LT)		Examination of the Republic of Lithuania and

		Sub-paragraph 10.2.6 of the Regulations of FSCL, approved by the Minister of Justice of the Republic of Lithuania (Order No. 1R-312 of 21 August 2007)
Netherlands	Speech data (FRIDA)	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR.
Forensic Institute (NL)	Text data (Survey responses)	Art.6(1)(a), GDPR; Art.9(2)(a), GDPR.
Israel national Police (IL)	Anonymised call data x- vectors (CASE 3)	Anonymous data, so no legal basis required
	Anonymised text data embeddings (BURGLARY CASE)	Anonymous data, so no legal basis required

Please note that only data relevant to the context of the project activities will be processed and analysed. The aim of processing the above datasets is to research data-analysis tools for LEAs, and to organise events about and disseminate information about these activities. Also note that the ROXANNE project processes other datasets that do not contain personal data, which are not mentioned here.

### 6.1. Profiling

Profiling involves the processing of personal data to evaluate people's personal aspects by automated means.<sup>1</sup> As part of the research in the ROXANNE project, partners evaluate how people communicate and interact with others in networks using software. This is part of the training and testing of software that is researched in the project. The project does not engage in law enforcement investigations and so no direct real-world effects will be created for data-subjects.

## 7. Recipients or Categories of Recipients of the Personal Data

Personal data may be shared between research partners/institutions involved in the project, strictly for the purposes of the project, provided appropriate agreements are in place. Personal data processed for research purposes is not shared with third parties outside the project unless there is a legal obligation to do so, or there is a discovery of incidental findings that related to illegal activity (this is in accordance with <u>European Commission policy</u>).

## 8. International Data Transfers

Several members of the ROXANNE consortium are located outside of the EU.

- Fondation de L'Institut de Reserche IDIAP, the project coordinator, is based in Switzerland. <u>The EU has made an adequacy decision with respect to Switzerland</u>. The processing of

<sup>&</sup>lt;sup>1</sup> Article 4(4), European Parliament and Council, Regulation (EU) 2016/679 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, OJ L 119, Vol.59, 4 May 2016; Article 29 Data Protection Working Party, Guidelines on Automated individual decision-making and Profiling for the purposes of Regulation 2016/679, WP 251, Adopted on 3 October 2017, pp.6-7.

personal data in Switzerland is currently regulated under the Swiss Federal Data Protection Act 1992; this is to be replaced by the Swiss Federal Data Protection Act 2021 which is expected to come into force in 2022. The 2021 Act increases the protection of personal data and updates Swiss regulations to have greater equivalence to the GDPR.

- The Israel National Police are an LEA partners based in Israel. <u>The EU has made an adequacy</u> <u>decision with respect to Israel</u>. The processing of personal data in Israel is regulated under Protection of Privacy Law, 5741-1981 and Protection of Privacy Regulations (Data Security) 5777-2017.
- Trilateral Research and Police Service Northern Ireland (LEA) are based in the UK. Following Brexit, UK-based partners are implementing Standard Contractual Clauses that will apply in the absence of an adequacy decision being provided by the European Commission. In any case, the UK implemented the GDPR in its national law under the Data Protection Act 2018. Since Brexit, it has also copied the GDPR into UK law as the 'UK GDPR'.
- INTERPOL is an international organisation, and so not subject to EU law. Data processing by INTERPOL is subject to the INTEPROL Rules of Data Processing, which provides data protection standards like the EU's GDPR.

## 9. Storage and Retention

Personal data will not be stored longer than is necessary for the research purposes pursued by the ROXANNE project. Over the course of the project, data will be reviewed periodically, and the necessity of ongoing storage assessed. Data which is no longer needed will be anonymised or deleted. The project is scheduled to end in December 2022. At this point, each partner will individually re-assess whether further storage is necessary and lawful. The maximum duration of data retention will be five years following the completion of the project in order to fulfil any reporting requirements to the European Commission.

## 10. Data Subjects' Rights and Limitations

If your personal data is processed by ROXANNE, you have the following rights, subject to restrictions laid down in law.

### Subject access request (Article 15 GDPR)

You have the right to obtain confirmation as to whether or not ROXANNE is processing personal data concerning you, and, where that is the case, access to it. We will provide you with a copy of your personal data undergoing processing in a commonly used electronic form.

### Right to rectification (Articles 16 and 18 GDPR)

You have the right to obtain the rectification of any inaccurate personal data concerning you. If you have challenged the accuracy of your data and asked for rectification you have the right to request the restriction of processing while we are considering your rectification request.

### Right to be forgotten (Article 17 GDPR)

In case you object to the processing of your data and there is no lawful basis to retain your data, we will comply with your request and erase your data.

Please note that your right to be forgotten might be limited, such as where the erasure is likely to seriously impair the achievement of the research purposes of the project.

### Right to object (Articles 21 and 18 GDPR)

You can object to the processing of your data by ROXANNE. In order to do that, you must provide us with specific reasons based upon your particular situation. Please note that the right to object is not an absolute right. The project will consider your objection and determine how best to respond.

If the processing is carried out for the performance of a task in the public interest (Article 6(1)(e) GDPR) or for a legitimate interest (Article 6(1)(f) GDPR), we can continue with the processing if we can demonstrate compelling legitimate grounds for the processing, which override your interests, rights, and freedoms. If the processing is carried out for scientific research purposes (Article 9(2)(j) GDPR), we can continue with the processing if the processing is necessary for the performance of a task in the public interest.

If any of these are the case, we will explain our decision to you, otherwise your data will be excluded from processing. You have the right to request the restriction of processing while we are considering your objection.

### Right to lodge a complaint with supervisory authority (Article 77 GDPR)

If you believe that your rights have been infringed, you can lodge a complaint with any supervisory authority, including the authority where you reside, work or where the infringement on your rights is suspected. This is without prejudice to any other administrative or judicial remedy you have.

## 10.1. Limitations on Data Subject's Rights

It is possible that national laws will exist which restrict the rights of the data subjects listed above. For example, national law, which is necessary and proportionate, may provide for such restrictions if they are intended to safeguard the prevention, investigation, detection, or prosecution of criminal offences pursuant to Article 23(1)(d) GDPR. National law can also derogate from some of the rights set out above in circumstances where the data is processed for scientific research purposes, pursuant to Article 89(2) GDPR.

The project consortium is not obliged to maintain, acquire, or process additional information in order to identify the data subject for the sole purpose of complying with the GDPR pursuant to Article 11(1). However, pursuant to Article 11 (2) GDPR, where data subjects provide additional information in order to exercise their rights, the ROXANNE consortium will handle the request in a manner compliant with technical and legal requirements. In this regard, the identity of the data subject, as well as their relation to the data referred to in the request has to be sufficiently verified.

Although data subjects' rights may be restricted under the conditions described, all requests to the below mentioned points of contact will be carefully assessed on a case-by-case basis and replied to.

# 11. Contact Details

To contact the project about personal data processing, you can get in touch with the Co-ordinating partner, which is the Fondation de L'Institut de Reserche IDIAP, or the partner leading work on data protection issues, which is Trilateral Research. The contact details for these partners are below.

### Project coordinator:

Dr. Petr Motlicek: <u>petr.motlicek@idiap.ch</u>.

### Ethics and legal adviser:

Dr. Joshua Hughes: joshua.hughes@trilateralresearch.com