

# CSI-COP

**Citizen Scientists Investigating Cookies and App GDPR compliance**

**Deliverable D1.9 (D8)**

## CSI-COP Data Management Plan 2 - Revised

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**LEAD Partner for deliverable: Coventry University**

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### Dissemination Level

PU	Public	x
R	Report, <b>DEM:</b> Demonstrator, pilot, prototype, plan designs, <b>DEC:</b> Websites, patents filing, press & media actions, videos, etc., <b>OTHER:</b> Other (Database, online tools, questionnaires, etc)	X
CO	Confidential, only for members of the Consortium (including the Commission Services)	
CI	Classified, information as referred to in Commission Decision 2001/844/EC.	



## Version control table

Version Control				
Version	Date: 2021	Author(s)	Institution	Reason for Change
1 - Initial Draft	15.11.21	Huma Shah	CU	Without contents page and reference section
2	16.11.21	Huma Shah, Dorottya Rigler, Mária Hinsenkamp, Ulrico Celentano, Tiberius Ignat	CU NaTE, UOULU, IB	Joint review and clarification of text.
2	16.11.21	Tiberius Ignat	IB	Content on FAIR
2-1	16.11.21	Huma Shah	CU	Placed section on FAIR in context to GDPR.
2-2	30.11.21	Huma Shah	CU	Completed data map in Appendix 3
2.2.1	07.12.21	Huma Shah	CU	Added link to ethics deliverable report D1.15/D31
3	17.02.22	Huma Shah	CU	Added section on the citizen science investigation tool
4-1	13.06.22	Huma Shah	CU	Revision following guidance from EUPO to comply with EU DMP reporting guidelines here: <a href="https://ec.europa.eu/research/participants/docs/h2020-funding-guide/cross-cutting-issues/open-access-data-management/data-management_en.htm">https://ec.europa.eu/research/participants/docs/h2020-funding-guide/cross-cutting-issues/open-access-data-management/data-management_en.htm</a>
4.2	14.06.22	Huma Shah	CU	Added new sections 'New Data' and 'Change in Consortium'
4.2.1	16.06.22	Huma Shah	CU	Editing 'New Data section'
4.2.2	21.06.22	Dorottya Rigler	NaTE	Minor edits ('gender' added in two places).
4.2.3	27.06.22	Huma Shah	CU	Final edits before submission
4.2.4	04.10.22	Huma Shah	CU	Revised following rejection of version 4-2-3.



## List of Abbreviations

Abbreviation	Description
CS	Citizen science
DMP	Data management plan
DPIA	Data protection impact assessment
FAIR	Findable, accessible, interoperable and reusable
GDPR	The EU's General data protection regulation that came into force in May 2018
Meta-data	Anything that describes a data file, for example, the file type, file size, who authored a report with the data.

## Key Terms

Data protection; data protection impact assessment; Informal education course, informed consent; MOOC, participant information sheet, personal data, privacy, purpose limitation; your right to privacy online.



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## Executive Summary

This second CSI-COP data management plan (DMP2) is a mid-term report presenting new data that the project is collecting since the submission of the first data management plan (DMP1) to the EU in June 2020. This DMP2 complements the research ethics deliverable report D1.15/D31 (Shah et al., 2021). This deliverable presents CSI-COP's data protection impact assessment (DPIA), and the resulting implementation of the general data protection regulation (GDPR) compliant processing across the project. This is in addition to following the F.A.I.R. principles as explained in DMP1. Data processing taking place in the current stage of the project includes following the '**purpose limitation**' principle in the GDPR to **collect limited personal data** (name and email address). This limited personal data pertains to interested members of the general public participating as learners completing CSI-COP's free informal education course 'Your Right to Privacy Online'. The nature of the data collected in the whole project by CSI-COP reporting periods will be:

- a) DMP1: literature review (Period 2: January 2020-December 2020).
- b) DMP2: minimal personal data on members of the general public completing CSI-COP's 'Your Right to Privacy Online' free informal education course (Period 2: January 2021-June 2022).
- c) DMP3: investigations of GDPR compliance through tracking cookies in websites and in apps carried out by CSI-COP's citizen scientists and CSI-COP researchers (Period 3: July 2022-June 2023).

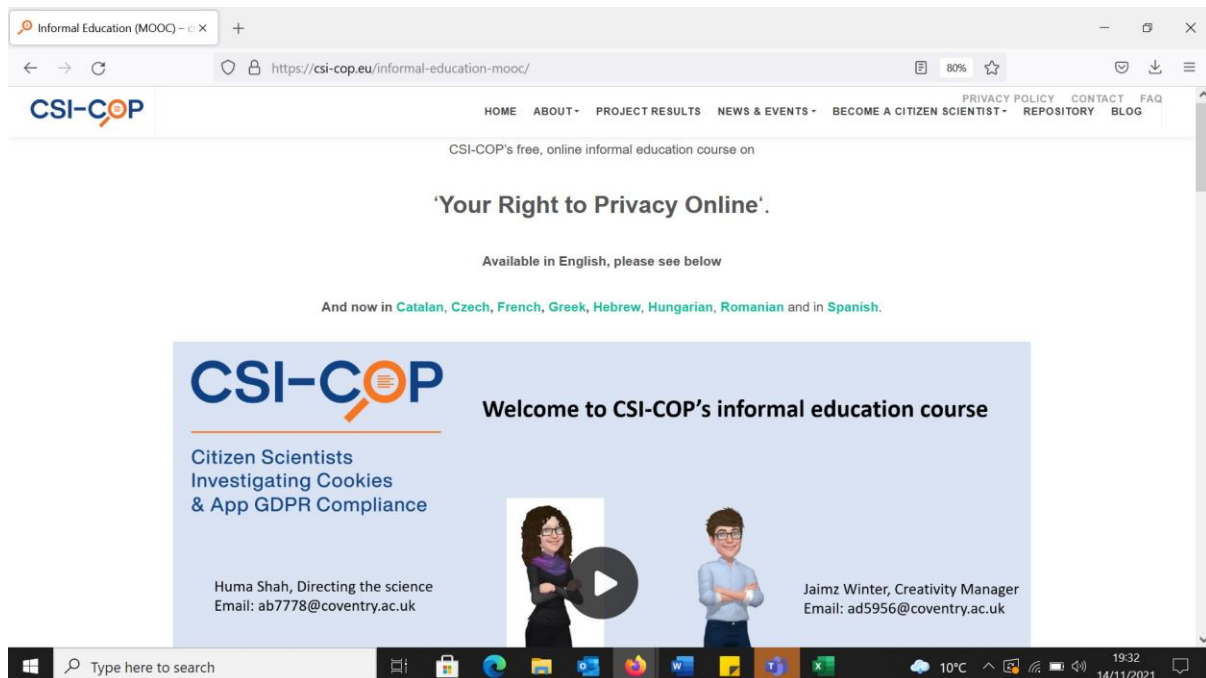
The previous data management plan reported on a) above. DMP3 will report on c) investigations of the extent of online tracking through cookies and similar technologies in websites and in apps. The final data management plan (DMP3) is due in Period 3: month 40 (April 2023). This DMP2 presents b) – the data collection and data management in the general public '**informal learner**' phase in the CSI-COP project.



## Introduction to CSI-COP Data Management 2

The first data management plan (DMP1: D1.8/D7; Shah, Ignat & Pocs, 2020) detailed how the CSI-COP project would conform to the EU Horizon 2020 open research data pilot. The purpose in DMP1 was to ensure CSI-COP findings would be made open under the **F.A.I.R.** data management principle: **findable, accessible, interoperable** and **reusable**. CSI-COP is a citizen science (CS) project investigating online privacy through the compliance of the general data protection regulation (GDPR). This action is specifically focussed on informed consent in tracking technologies, such as cookies, across the web and in apps. This second and follow up data management plan (**DMP2**) demonstrates how the F.A.I.R principle has been implemented in CSI-COP, and how the GDPR is being complied with in the project itself. In the current stage of CSI-COP, dissemination activities are leveraged to raise awareness of the project's free informal education course, '[Your Right to Privacy Online](#)' (Fig 1).

Figure 1: 'Your Right to Privacy Online' course



DMP2 covers the data collection in this phase of the project. The data required in Period 2 in CSI-COP covered by DMP2 is the requirement of:

- i) The name of a member of the general public and potential citizen scientist who shows interest in completing CSI-COP's free informal education course (a learner), and
- ii) Their email address.

The learner's email address allows CSI-COP project partners to gain informed consent and to issue the learner with CSI-COP's course completion certificate. The learner's email also assists the project partners to find if there is interest and motivation in the learner to receive further information about joining the project as a volunteer citizen scientist. This report details the process of securely managing



volunteers' data as they proceed from learner, completing the CSI-COP course, to indicating their interest, or non-interest, in receiving further information about the project to becoming a citizen scientist investigating online tracking.

#### F.A.I.R

CSI-COP follows the F.A.I.R. principle, detailed in the initial data management plan- DPM1 (D1.7/D8; Shah, Ignat & Pocs, 2020), through the project's deliverable reports being made freely available from a number of online platforms. These include CSI-COP website results' page (<https://csi-cop.eu/projectresults/>), **Zenodo** (<https://zenodo.org/>), and the lead author's Academia.edu, ResearchGate and Pure pages (<https://pureportal.coventry.ac.uk/en/persons/huma-shah>). CSI-COP's public reports are listed in the data map in Appendix 3 and include:

D2.1 Public report on current methods in CS Engagement (Ignat et al., 2020).

D2.2 Guidelines for Diverse Citizen Science Engagement (Hinsenkamp, et al., 2020)

D2.3 CSI-COP Framework for Engaging Citizen Scientists (Stepankova, et al, 2020)

D1.13 Policy Brief 1: How Citizen Science Can Add Value to Investigate Compliance of the General Data Protection Regulation (GDPR). (Shah, 2021)

D1.6 Societal Impact Report 1 (Shah, 2022).

In the next section, the **data protection impact assessment** (DPIA) for CSI-COP's new data collection is explained. This data pertains to informal learners completing CSI-COP's free informal education course, '**Your Right to Privacy Online**'. The content of this course was co-created using MOOC templates from Coventry University. It was designed across five easy-to-follow steps by Coventry University and Coventry University's CSI-COP sub-contractor, Privacy Matters (Table 1).

Table 1: : Steps in 'Your Right to Privacy Online' course

Step	Step Content.
1	What is privacy?
2	What is personal data?
3	How are we tracked online?
4	What rights do we have to data protection and privacy?
5	Free tools to protect our data and privacy

In the following sections, explanations are presented of what new data was required in CSI-COP, and how that data was collected complying with the GDPR following DMP2.

#### New Data

CSI-COP free informal education course '**Your Right to Privacy Online**' was first made available in English at the end of project month 16 (April 2021). Due to COVID-19 necessitating country lockdowns to stop the spread of the pandemic, the initial availability of the course was as a complete-in-your-own time (asynchronous) informal education learning experience with practical exercises. The course includes a self-assessment test, and a survey in the same one document (the MOOC). The [MOOC](#)



[document](#) was made accessible from a dedicated page on CSI-COP's website, and also on 'sister' citizen science project platform's 'Moodle' page: [EU-Citizen.Science](#). The MOOC was translated into several languages following a recommendation from the External Reviewer of Period 1, to utilise unused travel funds for CSI-COP document translation.

Online delivery of the course began delivered by partner CU in October 2021. As COVID-19 restrictions eased from autumn 2021, face-to-face delivery began in November 2021, firstly by partner UPAT in Athens. For the self-assessment in the CSI-COP course, ten multiple choice questions help a learner to check the knowledge they gained. On completion of the questions, the learners are invited to send their answers to the CSI-COP team. The learner can then claim a CSI-COP certificate (see Appendix 1) and request to learn more about the project.

Data protection impact assessment (DPIA) led to the decision on what **new data** would be needed in the project. During Period 2 in the CSI-COP project (January 2021 to June 2022), it is a **MOOC learner's name** and **email address** that is collected. This is to comply with Article 5 (1) (b) in the GDPR: the **purpose limitation principle** (ICO, n.d.). The legitimate reason for collecting this limited amount of **personal data** is to issue learners with a CSI-COP certificate with their preferred name.

A course feedback page is included in the MOOC document (usefulness of the course from 1-5 where 5 is very useful). This feedback allows the CSI-COP partner receiving it to gauge motivation, interest and further engagement on the part of the learner in CSI-COP. A pre-participation survey is also included in the course document seeking answers to anonymous questions. These questions concern some non-identifiable data, such as age-range, and gender, how often the Internet is used, and how it is accessed. The reason for the anonymous survey is to understand the reasons for the interest in completing the course. The survey questions are to help the project respond to the EU's SwafS-15-2019 call to find out *who citizen scientists are*.

At the time of this revised report and following ethical research principles (see CSI-COP Ethics report D1.15/D31 Shah et al., 2021) the text of the CSI-COP course has been translated from the original English into twelve languages:

1. Catalan
2. Czech
3. Finnish
4. French
5. German
6. Greek
7. Hebrew
8. Hungarian
9. Italian
10. Polish
11. Romanian
12. Spanish





The MOOC is available in English language only on the EU funded EU-Citizen.Science [online platform](#).

## New Data collection

In this section we explain how and why the limited personal data is collected from a member of the general public who becomes aware of, and interested in, the CSI-COP project. Through the consortium partner's communication and dissemination activities, the general public become aware of CSI-COP and the opportunity to take CSI-COP's free informal education course. The translated course document contains CSI-COP partner contact information. On completion of the course as self-study (MOOC), learners are encouraged to send their multiple-choice test answers to the appropriate partner, depending on which language the course has been completed in. For example, if the course is completed in English, then the contact names for queries, or for sending through self-assessment test answers are to Coventry University team member and CSI-COP Director of Science, Dr. Huma Shah, or to CSI-COP Creativity Manager, Mr. Jaimz Winter.

As mentioned in an earlier section, the other data collected at this stage, from the asynchronous CSI-COP course document, includes anonymous responses to a pre-participation survey. This survey does not contain any questions that elicit information that could identify a natural person. The questions asked are to respond to the EU's SwafS15-2019 call on '*Who are citizen scientists?*'. To glean this information, an optional survey in the MOOC asks non-identifiable questions about the learner. The data gained provides intelligence to respond to the EU's **cross-cutting priorities**:

- a) geographical data: whether the learner accesses the Internet from a rural or urban area (geographical),
- b) socio-economic: whether the Internet is accessed for work, pleasure or both,
- c) gender and
- d) age-range.

As mentioned above, filling in the survey is voluntary and not a requirement to receive a certificate on completion of the course. Further, members of the public who complete the course can progress to becoming CSI-COP citizen scientists without completion of the survey. A sample of the anonymous survey questions can be found in Appendix 2.

## Data management

CSI-COP's personal data management process is **decentralised**. Each partner is responsible for the secure and safe data storage of the limited personal data (two data points: learner's name and email) collected in the recruitment and informal education phase of the project covered by this data management plan. As part of **citizen scientist recruitment in task T3.1** in work package 3 (WP3), and as mentioned in the previous section, the personal data collection involves securely handling limited personal data collected following a learner's course completion.

Additionally, if a learner completes the MOOC survey, the appropriate CSI-COP consortium partner stores learners' anonymous responses separately and kept confidential from their limited personal data.



Anonymised surveys are passed by CSI-COP T3.1 recruiting partner to one partner only: NaTE. This distribution is to allow NaTE to perform a task they lead in work package 4 (WP4): **T4.3 report on gender, age, socio-economic and geographical location of the recruited citizen scientists.**

No central record is kept of learners' personal data, of those individuals who have completed CSI-COP course. Each CSI-COP recruiting partner involved in T3.1 is responsible for complying with the GDPR during data collection and processing, and ethical research. Each partner involved in T3.1 (recruitment from members of the public), and T3.2 (informal educating members of the public) processes the limited personal data of the learner they recruit. Each partner is responsible for **securing the limited personal data that they collect on the general public** who complete CSI-COP's informal education course, whether as a self-study MOOC, or by attending one of the partner workshops. As already mentioned, this process involves following research ethics principles detailed in CSI-COP's research ethics policy (deliverable D1.15, Shah et al., 2021). The partners involved in the specific citizen science tasks T3.1 and T3.2 in work package 3 are: CU; UPAT; NaTE; UOULU; BIU; CTU, IB and UAB. The process for learner's minimal personal data collection is as follows:

1. Communication and dissemination activities by the project partners raise awareness of CSI-COP's free, informal education course available in a number of languages.
2. Interested members of the general public reached by the dissemination activities take the opportunity to complete CSI-COP's course 'Your Right to Privacy Online'.
3. CSI-COP partner receives an email from a learner advising completion of the course and sending their test answers seeking a CSI-COP certificate.
4. Partners record the name and email of the learner in their own confidential spreadsheet applying a unique anonymous reference. For example, if Coventry University receive a request for a certificate with self-assessment test answers, they allocate a reference beginning with CU, then a number from 1, and an M for MOOC completion (later O, for online course completion, and F for face-to-face informal education events). Examples of unique references are: UOM001, UOF002, UOO36, where the UO represents the partner UOULU. The letter between the partner acronym and the numerals is the identifier how the informal education was completed. This helps CSI-COP to understand which medium of delivery was preferred, and which might need improving. The non-identifiable references would be to keep the names of the learners confidential and separate from any other information. The unique references are kept confidential in a password-protected Excel spreadsheet accessible only by the partner who has received the learner's self-assessment test answers and request for their certificate.
5. Once the test answers are checked by the partner and at least eight of the ten answers are correct, the partner sends a MOOC-specific informed consent sheet to the learner requesting permission to add their name, as the learner wishes it to appear, on their CSI-COP certificate.



If not submitted, at this time a reminder is sent to the learner requesting completion of the pre-participation survey (MOOC survey).

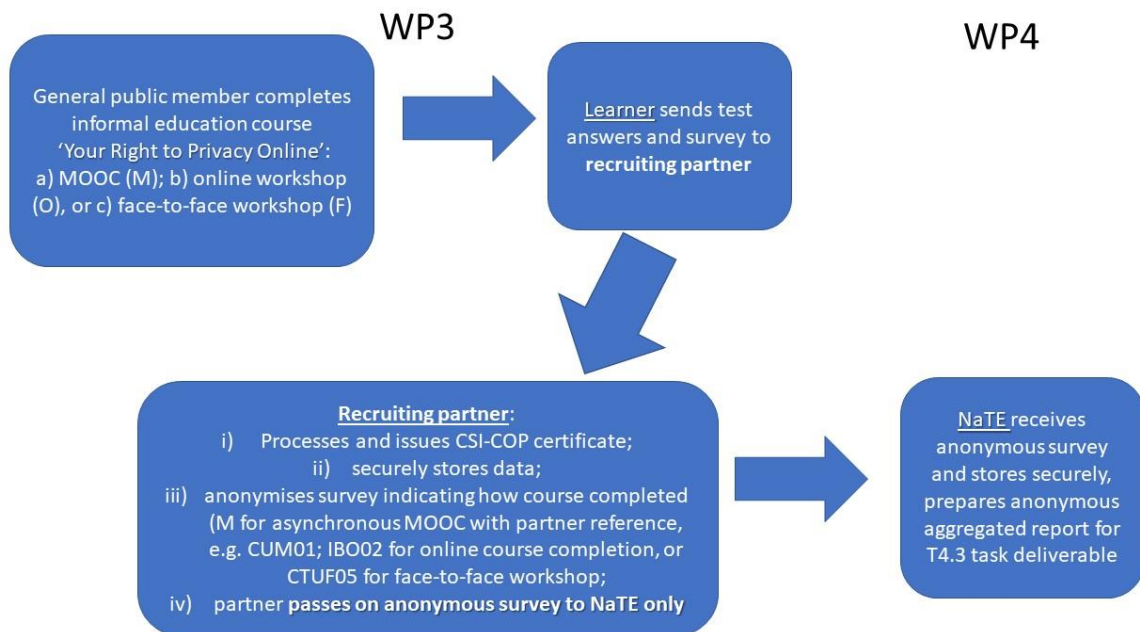
6. On receipt of the MOOC-specific GDPR-compliant informed consent sheet, the next stage in the data management process is:
  - i. If it is indicated that the learner is willing to receive further information about the CSI-COP project, then
    - a) A certificate is prepared (see Appendix 1),
    - b) The latest CSI-COP Newsletter is included in the next despatch
  - ii. Participation Information is included with the dispatch
    - a) Full Participant / Volunteer Information Sheet
    - b) Full project GDPR-compliant Informed Consent sheet
    - c) If the pre-participation survey is not yet completed, it is sent with the dispatch
  - iii. If the learner has indicated in their MOOC-specific informed consent sheet that they do not wish to receive any further information about the project, then in this case their certificate is prepared and emailed to the learner with no further correspondence with the learner.
  - iv. The MOOC-specific informed consent sheets are stored securely in electronic form in a password protected folder by each partner in a secure online space. For example, in OneDrive, or in a partner's own CSI-COP's SharePoint space in the cloud. This is to realise the data anonymisation and minimisation principles detailed in CSI-COP first data management plan 1 (Shah, Ignat & Pocs, 2020).
7. If a pre-participation (MOOC) survey has been completed, the email and name of the learner is extracted from any information with it by the receiving partner. The anonymous survey is sent with the unique anonymous reference allocated by the recruiting partner, to partner NaTE. As mentioned earlier, this is because NaTE lead a work package 4 task, T4.3 requiring a deliverable report (D4.3). NaTE need the reference in case of any queries on task T4.3 which would be resolved easier with the appropriate partner.
8. NaTE securely stores the surveys. NaTE do not pass the surveys on to any other partner. NaTE uses the surveys to aggregate the anonymous data to prepare a report on who the



learners were for deliverable report D4.3. This deliverable will form the basis of the final project report on how many learners from the course progressed to becoming CSI-COP citizen scientists.

CSI-COP’s data management process detailed in steps 1-8 (pages 10-11) is illustrated in Fig 2.

Figure 2: CSI-COP limited personal data flow



In the next section, a change in the consortium is briefly explained.

### Changes in CSI-COP Consortium

The composition of CSI-COP changed due to one partner termination in the early phase of Period 2. This is detailed in the Amendment which also requested a twelve-month extension to the project due to COVID-19 related delays. This realised a new project-end date of 30 June 2023. The original consortium consisted of eleven partners; with the termination of Tilburg University, CSI-COP consortium now has ten partners. The terminated partner did not complete any citizen science recruitment or translate the MOOC into Dutch. Hence the terminated partner did not need to follow CSI-COP’s data processing, since they were not informally educating interested members of the public in the Netherlands.



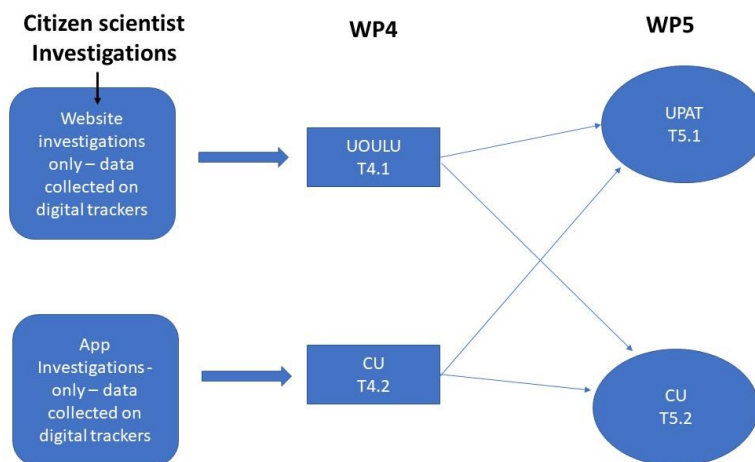
## Concluding

CSI-COP complies with the GDPR. By creating an informed consent sheet specially to write a learner's name in their CSI-COP 'Your Right to Privacy Online' course completion certificate, the project is following the principles contained in the GDPR. In implementing this, CSI-COP is conveying to the potential citizen scientist *how* their rights to data protection are respected. Further, in making the project's public documents freely accessible from online platforms (e.g., Zenodo), CSI-COP follows the F.A.I.R. principle (see Appendix 3).

In CSI-COP project's next and final data management plan (DMP3) in Period 3, a description of the other type of data collection will be presented. The next type of data collected in the CSI-COP project will be the number and types of digital trackers found in websites and apps. This data will be realised from the learners applying their new knowledge and practical skills following completion of the free informal education course and training offered by partners. This will be investigations of the extent of tracking in websites CSI-COP citizen scientists' visit, and apps they use (for WP4). These engaged members of the public will be those who gave their full informed consent to join the project as volunteer citizen scientists.

The results of the CSI-COP team and citizen scientists' investigations of tracking cookies across websites and apps will forge the innovation of a free online, accessible and searchable repository of trackers, task T5.2 led by CU for WP5 in Period 3 (see Fig 3).

Figure 3: Citizen scientists' online tracking investigations data flow in the next stage of the project



The final data management plan at the end of the project, CSI-COP will report on any necessary variations to the collection and processing of limited personal data while fully complying with the GDPR. Additionally, a broadening of the citizen science cohort will take place as the Coordinating partner, CU, gained ethical approval at the start of Period 3 in August 2022 to include school pupils (under 18s) as junior citizen scientists in CSI-COP. A new set of participant information and informed consent documents have been prepared by CU. These are currently undergoing translation by the partners to involve school pupils in their locale. The results of the final data collection will be reported in DMP3.



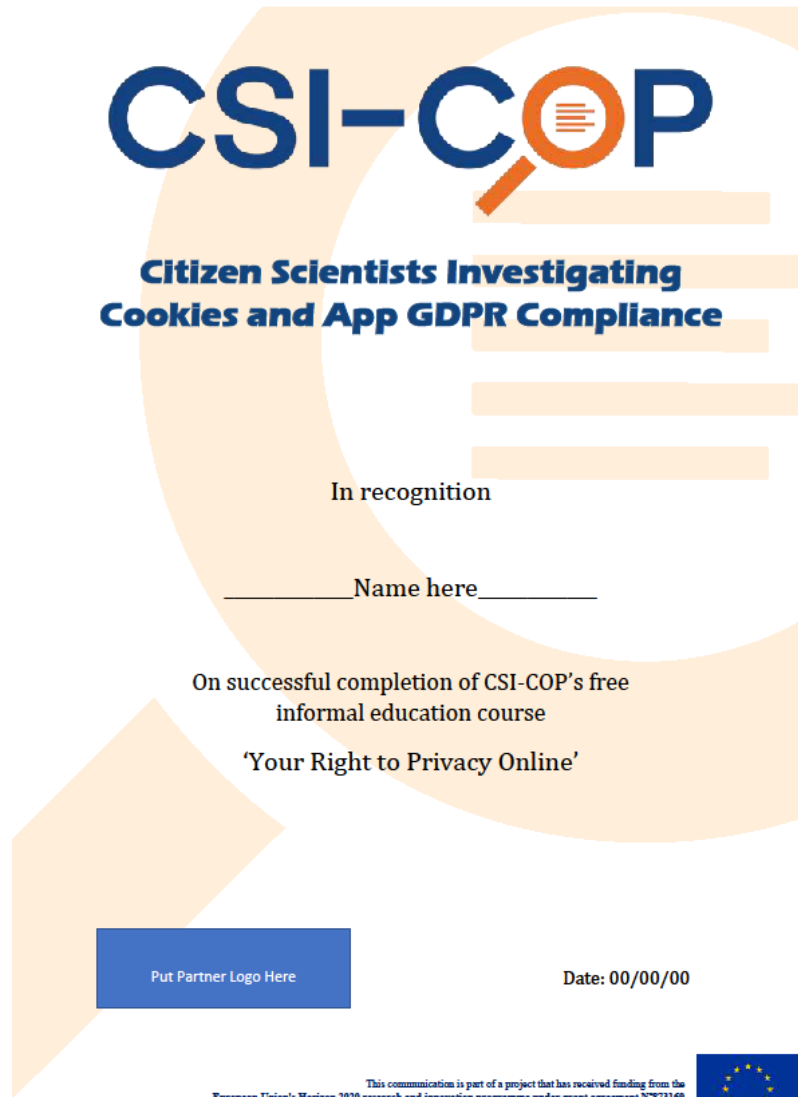
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## Appendix 1

CSI-COP Certificate for 'Your Right to Privacy Online' course completion.



**CSI-COP**

**Citizen Scientists Investigating  
Cookies and App GDPR Compliance**

In recognition


\_\_\_\_\_ Name here \_\_\_\_\_

On successful completion of CSI-COP's free  
informal education course  
'Your Right to Privacy Online'

Put Partner Logo Here

Date: 00/00/00

This communication is part of a project that has received funding from the  
European Union's Horizon 2020 research and innovation programme under grant agreement N°873169



## Appendix 2

Sample questions in pre-participation survey in [CSI-COP course document](#).

<b>Age range: please circle one from the range</b>	18-39;      40-65;      66+;      Prefer not to say
<b>Gender: please select one</b>	Female; Male; Intersex; Trans Umbrella; Other; Prefer not to say
<b>Location: please select one</b>	Urban – towns and cities -e.g. Patras, Coventry, London  Rural – villages (below 2000 population)  Prefer not to say
<b>Languages:</b> 1. What is your dominant, or mother tongue?  2. Do you speak more than one language fluently?  <b>You can prefer not to say.</b>	1.  2.  Prefer not to say
<b>Accessibility:</b>  Do you regard yourself as having some accessibility issues; for example, use text-to-speech software due to a visual impairment?	YES  NO  Prefer not to say
<b>Work:</b>	Student level: please select  Undergraduate  Postgraduate  Doctoral  Non-student: please select the category that best describes your employment status:  Employed, working 36.5 or more hours per week  Employed, working 1-36 hours per week  Not employed, looking for work  Not employed, not looking for work  Refugee seeking asylum  Retired  Having accessibility issues, not able to work





### Appendix 3

Map of data gathered in Period 2 of CSI-COP project (January 2021: June 2022)

Brief description	Data Category	Data type	Metadata	Data format	Type of Persistent identifier	Owner	Data size	To whom outside the project data might be useful?	Publicly available?
Project deliverable D2.1: Current methods in citizen science engagement	Document: version4	Text	Authors, keywords, file type, file size, embedded images	PDF	DOI (on Zenodo): 10.5281/zenodo.3899478	CSI-COP	1.3MB	Citizen science researchers and practitioners, policy makers, educators, citizen scientists.	Yes
Project deliverable D2.2: Guidelines for diverse citizen science recruitment	Document: version 5.3	Text	Authors, keywords, file type, file size, embedded images	PDF	DOI (on Zenodo): 10.5281/zenodo.3923820	CSI-COP	1.5MB	Citizen science researchers. Equality, diversity and inclusivity researchers.	Yes
Project deliverable D2.3: CSI-COP Framework	Document: version 2.4	Text	Authors, keywords, file type, file size,	PDF	DOI (on Zenodo): 10.5281/zenodo.4066515	CSI-COP	744.4kB	Citizen science researchers	Yes



for Engaging Citizen Scientists			embedded images						
Project deliverable D1.13: Policy Brief 1	Document: version 4.	Text	Authors, keywords, file type, file size, embedded images	PDF	DOI (on Zenodo): 10.5281/zenodo.4672515	CSI-COP	762kB	Privacy researchers, data protection policy makers; web and app developers, tech journalists, data management planners	Yes
Project deliverable: Free informal education course 'Your Right to Privacy Online' (MOOC)	Document:	Text, currently in twelve languages	Authors, keywords, file type, file size, embedded images	WORD, PDF, Open text document (ODT)	CSI-COP website: <a href="https://csi-cop.eu/informal-education-mooc/">https://csi-cop.eu/informal-education-mooc/</a> EU-Citizen.Science platform: <a href="https://moodle.eu-citizen.science/">https://moodle.eu-citizen.science/</a>	CSI-COP	WORD: 1.79MB PDF: 681kB; ODT:1.54 MB	The general public interested in informal education. Teachers, parents; data protection and privacy researchers; tech journalists, policy makers, web technology developers.	Yes
Project deliverable D1.6: Societal Impact 1	Document	Text	Author, keywords	WORD document	DOI on Zenodo: 10.5281/zenodo.6641596	CSI-COP	24MB	Citizen science project teams interested in learning about societal impact of citizen science projects.	Yes
Name of general public member/ learner completing CSI-COP course	Row in a password protected, confidential Excel sheet	Text and numbers	Unique reference	Excel sheets		General public member	Not applicable	Not applicable as this data will not be made available outside of the partner collecting this information.	No



Email of general public member/ learner completing CSI-COP course	Row in a confidential password protected Excel sheets	Text and numbers	Email address	Excel sheets		General public member	Not applicable	Not applicable as this data will not be made available outside of the partner collecting this information	No
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