



EUROPEAN POLICYBRIEF



Citizen Scientists
Investigating Cookies
& App GDPR Compliance

POLICY BRIEF2

Standardising Cookie Notices and Privacy Policies to Improve Compliance of the General Data Protection Regulation (GDPR).

[Deliverable D1.14 | D30]

DATE: 31 July 2023

INTRODUCTION

This first policy brief in [CSI-COP](#), an [Horizon2020 Swafs-15 2018-19](#) 'Exploring and supporting citizen science' funded project, presented the pre-citizen science engagement stage in the project. This second policy brief makes two recommendations arising from the evidence in the engagement of citizen scientists in collaboration with the project researchers. Investigating the general data protection regulation (GDPR), specifically as it relates to transparency of cookie notices and privacy policies in collecting personal data through informed consent from websites and apps, shows that compliance is not followed completely. From website and app investigations, and evidence here provided from one EU funded project website, CSI-COP recommends that EU requires its funded projects to a) follow guidelines to extract unnecessary third-party tracking embedded in website, and Android app, development environments, and b) accept standardised cookie notices and privacy policies.

EVIDENCE AND ANALYSIS

Among the citizen scientists' and [CSI-COP project](#) researchers' investigations hosted in [CSI-COP Repository](#) of websites and apps (Figure 1) there are over one hundred (100) EU funded project website investigations.

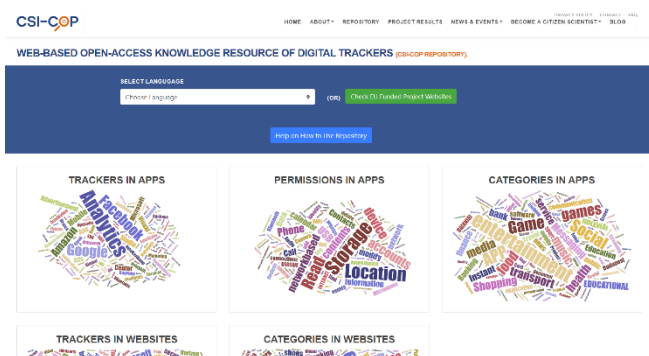


Figure 1: CSI-COP Repository: <https://csi-cop.eu/repository/>

EU funded project websites investigated by the CU team include open and closed citizen science projects. These investigations can be explored by selecting the green button with text ‘Check EU funded Project websites’ (Figure 1) on the homepage of the [Repository](#). On selecting this green button, a page appears with options (Figure 2).

On selecting the button ‘Find All’ the EU funded project websites investigated in CSI-COP are displayed as ‘cards’ (Figure 3).

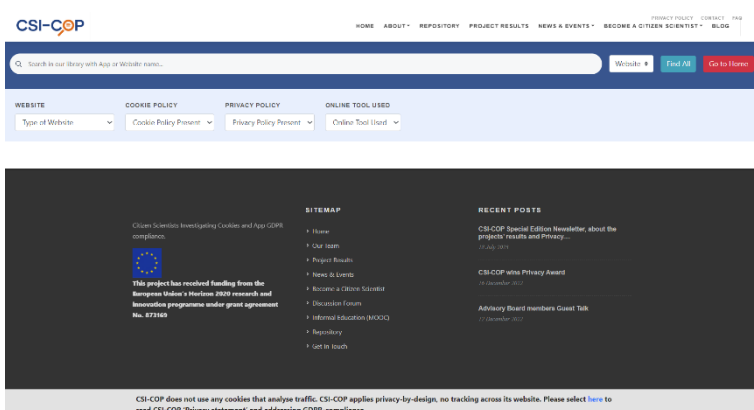


Figure 2: Second page in Repository on selecting ‘Check EU funded Project websites’

Each card (Figure 3) can be selected to find information on what was found beneath the EU funded project website on the date it was investigated (Figure 4).

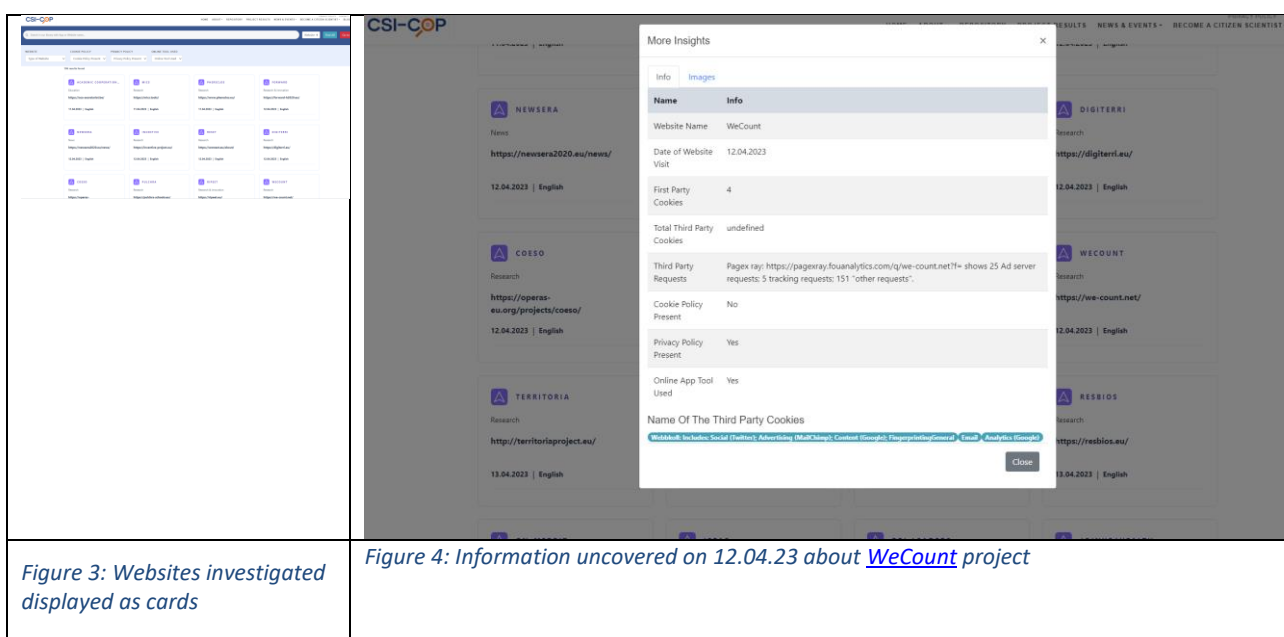


Figure 3: Websites investigated displayed as cards

Figure 4: Information uncovered on 12.04.23 about [WeCount](#) project

As an example here, concluded EU funded citizen science project for ‘live traffic counting by citizens’, [We Count](#) funded under the same [SwafS-15 2018-19](#) theme (Horizon2020 GA-872743: <https://www.we-count.net/>) was explored on 12.04.23 (Figure 4). CSI-COP Repository data shows that a free online privacy audit tool [Webbkoll](#) (<https://webbkoll.dataskydd.net/>) was used to explore beneath WeCount website. Among the ‘third-party cookies’ found by webbkoll on 12.04.23 in WeCount are **Google Analytics**, **Content (Google)**; **FingerpringingGeneral**, Advertising(MailChimp) (Figure 4). In CSI-COP’s [Taxonomy of Digital Cookies and Online Trackers](#) public report ([Deliverable D5.1|D18](#): March 2023), it was reminded that the Austrian Data Protection authority considered the use of Google Analytics to violate the GDPR due to transfer of data to the US. Webbkoll is used again in this document on 28.07.23 to find if [WeCount](#) website contains the same trackers as were found on 12.04.23.

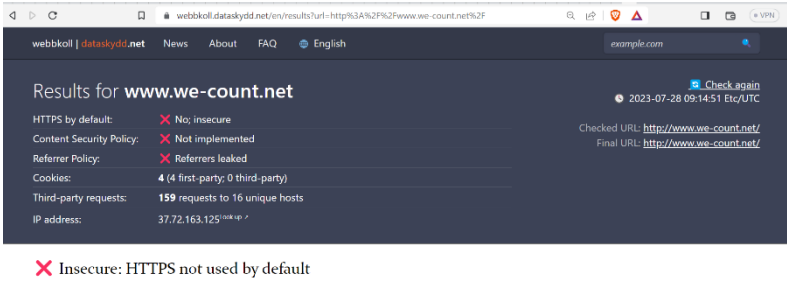


Figure 5: Webbkoll result of WeCount on 28.07.23: 159 requests from 16 unique hosts

Webbkoll showed that WeCount has 159 ‘Third-party requests’ (Figure 5) embedded in its website as at 28.07.23. These findings are the same as what was

found in the 12.04.23 investigation displayed in CSI-COP’s Repository. WeCount’s ‘Third-party requests’ include Google Analytics (Figure 6). WeCount website does not have a cookie banner or notice; it has a link to a Privacy Notice (Figures 7- 8). [WeCount Privacy Notice](#) is not transparent about the ‘Third-party requests’ permitted from its website.

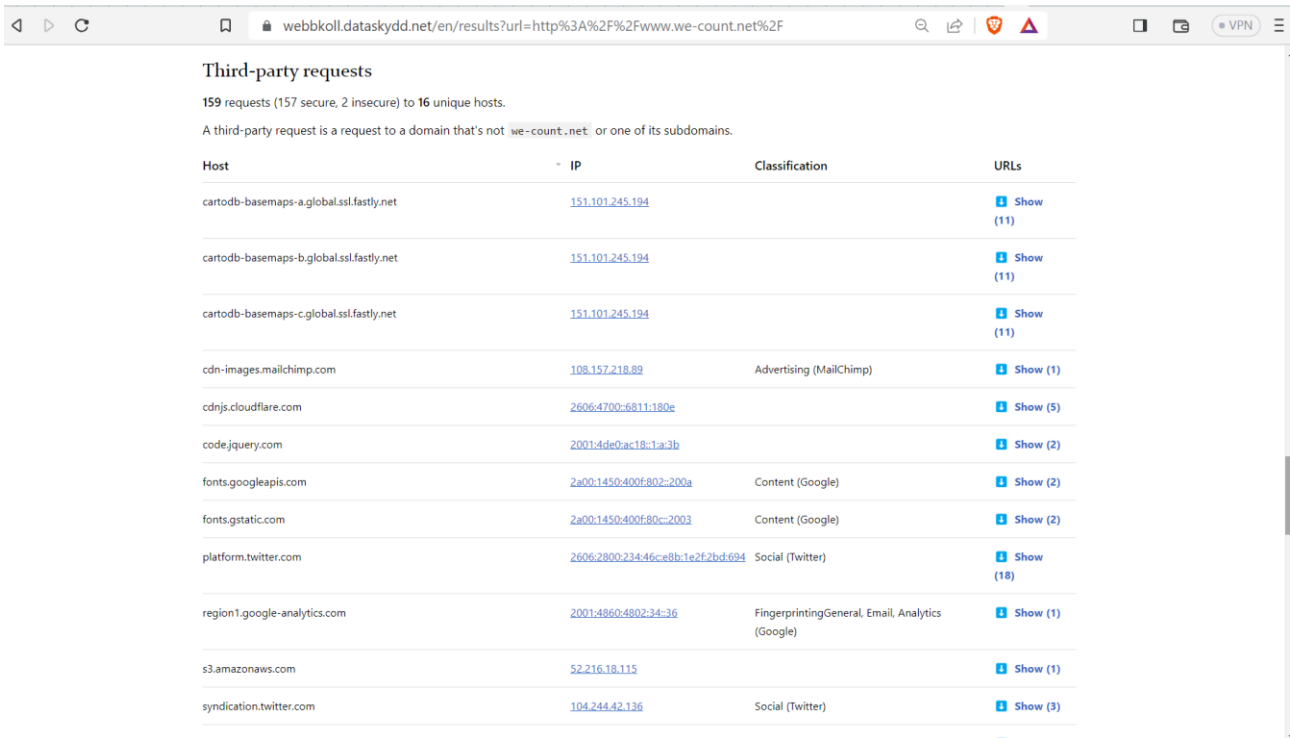


Figure 6: Webbkoll list of Third-party requests from WeCount website as at 28.07.23

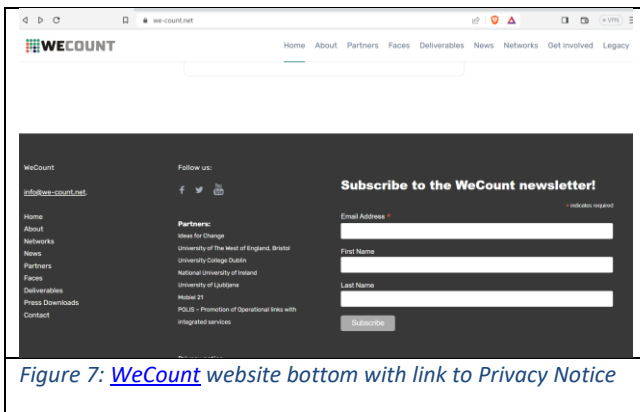


Figure 7: WeCount website bottom with link to Privacy Notice

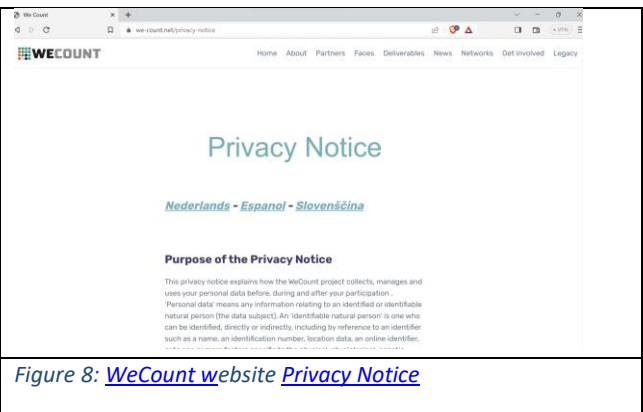


Figure 8: WeCount website Privacy Notice

Here we have provided evidence and analysis from one of the EU funded project websites investigated in CSI-COP. WeCount website can allow ‘Third-party requests’ to access visitors’ information without full transparency and informed consent. Other EU funded project websites investigated as part of CSI-COP project can be found in the Repository: <https://csi-cop.eu/repository/> (Figures 1-2). Analysis of all the

websites and app investigations, including EU funded project websites is ongoing and will be reported in open-access scientific peer-reviewed journal articles.

POLICY IMPLICATIONS AND RECOMMENDATIONS

In the project's first policy brief, CSI-COP recommended that:

“EU funded projects should be required to set-up minimal tracking project websites”

Additionally, CSI-COP recommended:

“if EU funded projects create apps, whether designed within the project by consortium partners or through sub-contracting, they should ensure that all requested permissions (e.g., to access contacts in smart phones), and any third-party trackers embedded in the apps, are made explicit to the app users. This would provide the opportunity for app users to make informed choices about whether or not to download and use the app.”

To further **“drive ethical design of privacy-first technologies and tools”** CSI-COP makes two recommendations in this policy document.

Recommendation 1: the EU at least instructs its funded projects to follow these guidelines:

1. Guideline 1: a website or app should be designed with a privacy-by-design approach
2. Guideline 2: a privacy-by-design approach should include:
 - a. For websites: extract any embedded third-party cookies or third-party requests for information from the website development platform (e.g., WORDPRESS);
 - b. For apps in Android development platform: extract any embedded third-party cookies or permissions that are not necessary to make the app work.
3. Guideline 3: Make transparent the need for any Third-party cookies or Third-party requests, such as the use of Google Analytics.
4. Guideline 4: Create a clear and transparent Cookie Notice and Privacy Policy to enable visitors to EU funded project websites and users of project apps to make informed decisions on whether to accept or reject Third-party requests for personal data.

Recommendation 2: the EU should encourage standardised cookie notices and privacy policies in its funded projects. CSI-COP website cookie notice makes it clear that CSI-COP does not track visitors across its website (bottom banner, Figure 9).

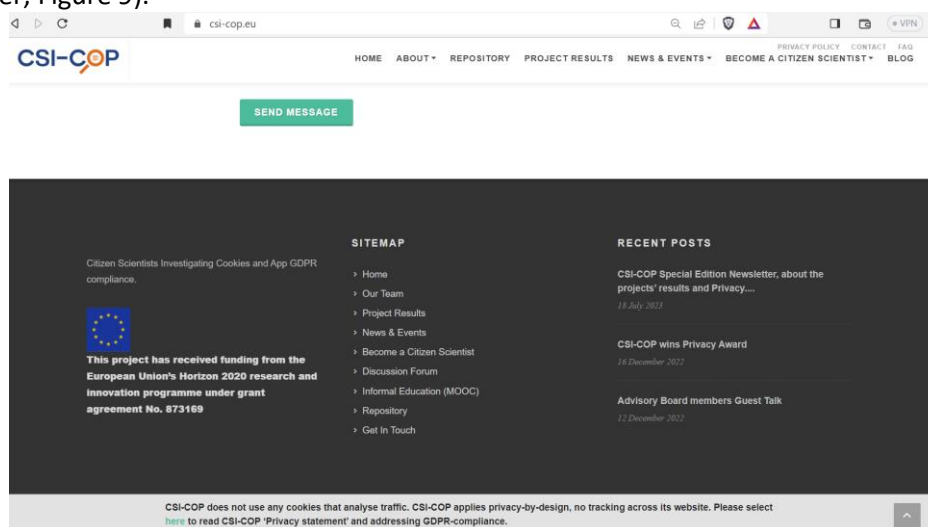


Figure 9: CSI-COP cookie banner

CSI-COP legacy includes a successful application for support from [HSbooster.eu](https://hsbooster.eu) to progress **CSI-COP standardisation plans for standard cookie notices and privacy policies that comply with the GDPR.**

SUSTAINABILITY AND LEGACY

The CSI-COP project began in January 2020 to raise awareness of two principles in the EU's general data protection regulation (GDPR): **transparency** and **informed consent**. This was achieved during the general public engagement phase recruiting and informally training citizen scientists online during COVID-19 restrictions, then in hybrid and in-person gatherings (in work packages 3 and 4), and during project dissemination activities interacting with a variety of stakeholders in consortium and individual partner organised events (in work package 6). CSI-COP nurtured citizen scientists producing **Pro-privacy champions** who presented their experience of investigating websites and apps in the project's main results dissemination and exploitation week in Brussels 23-26 May. CSI-COP privacy champions are the legacy of the project disseminating their knowledge of GDPR compliance in websites and in apps to a variety of stakeholders. This in turn is expected to promote improved data protection through privacy-by-design influencing policy makers, web and app developers, the Ad tech industry, educators, tech and privacy journalists, and citizen science researchers.

RESEARCH PARAMETERS

The CSI-COP project applied the ten principles of the European Citizen Science Association (**ECSA**) to build an ethical and inclusive framework to engage a diverse cohort of citizen scientists from across Europe and in Israel. Members of the public were informally educated using the CSI-COP created free informal education resource '[Your Right to Privacy Online](#)' translated into twelve languages. On completion of the resource, and receiving practical training, over 180 citizen scientists collaborated with CSI-COP researchers investigating websites they visited, and apps they used. The investigations have been innovated into a free, searchable online [Repository](#) meeting CSI-COP's six specific objectives (SO):

SO1: Setting-up the CSI-COP project and citizen science initiative (**completed**)

SO2: Engage citizen scientists to investigate compliance of the GDPR (**completed**)

SO3: Co-create a taxonomy of digital behaviour trackers: classify the distinct types of trackers in websites and in Android apps and who the trackers are from (e.g., a big tech company, a social media owner). (**completed**)

SO4: Create an open-access repository of trackers (searchable knowledge base) (**completed**).

SO5: Co-creating additional pro-privacy policies with the EU and international stakeholders so that data protection regulations are made easy to comply with (**ongoing legacy**)

SO6: Influencing Stakeholders to adopt a privacy-by-default, no-tracking policy across the digital space (**ongoing legacy**)

PROJECT IDENTITY

PROJECT NAME Citizen Scientists Investigating Cookies and Apps GDPR Compliance (CSI-COP).

COORDINATOR Coventry University - Coventry, UK. Contact email for author, CSI-COP (Co-I): Dr. Huma Shah: ab7778@coventry.ac.uk

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FUNDING SCHEME

EU Horizon2020 SwafS-15-2019.

DURATION

January 2020 – August 2023 (44 months with 14-months extension/Amendment).

BUDGET

EU contribution: 1 999 143.75 €.

WEBSITE

<https://csi-cop.eu/>

FOR MORE INFORMATION

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Acknowledgement: Giacomo Masone, Coventry University Research

Assistant: Investigated EU funded project websites and apps.

Acknowledgement for advice:

CSI-COP Advisory Board members: Professor Darlene Cavalier, Professor Julius Stoller, Professor Karen Yeung, Emerita Professor Diane Sonnenwald, Dr. Luigi Ceccaroni, and Professor Helen Bilton

CSI-COP Partner: Matthias Pocs-STELAR

Coventry University personnel: Dr. Huma Shah (author)

EU Project Officers: Raquel Fernandez-Horcajada (current)

FURTHER READING

Link to CSI-COP Repository of investigated websites and apps: <https://csi-cop.eu/repository/>

Link to CSI-COP 'Taxonomy of Digital Cookies and Online Trackers': <https://csi-cop.eu/project-results/taxonomy-of-cookies-and-online-trackers/>



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This policy brief reflects only the author's view and the European Commission/REA is not responsible for any use that may be made of the information it contains.