BLOCK START

D1.5: Data Management Plan - Final

12/2021

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Abstract	This deliverable describes the data management life cycle for the data collected, processed and/or generated by BlockStart

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Dissemination Level		
PU	Public	X
PP	Restricted to other programme participants (including the EC Services)	
RE	Restricted to a group specified by the consortium (including the EC Services)	
CO	Confidential, only for members of the consortium (including the EC)	

BlockStart Consortium			
Participant Number	**Participant Organisation Name**	**Short Name**	**Country**
1	Bright Development Studio, S.A.	BRPX	PT
2	UAB CIVITTA	CIVT	LT
3	F6S Network Limited	F6S	UK

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List of Abbreviations and Acronyms	
CV	Curriculum Vitae
DLT	Distributed Ledger Technology
EC	European Commission
EU	European Union
GDPR	General Data Protection Regulation
GB	Gigabyte
MB	Megabyte
PE	Private Equity
SME	Small and Medium-sized Enterprise
VC	Venture Capital
WP	Work Package

1. Introduction

The BlockStart project (hence, "BlockStart" or the "Project") and all its consortium partners have implemented the necessary measures in order to comply with the applicable National and European laws on personal data protection. For the avoidance of doubt, BlockStart, as a Coordination and Support Action, does not involve research activities and therefore, does not generate, collect and/or process research data, namely, involving and having as research scope personal data.

This document presents the policies, principles and implemented measures to ensure the said compliance hereunder with the applicable personal data protection requirements, contextualized with an overview of relevant data flows and datasets occurring throughout the Project, and constitutes the core of the applicable detailed data protection policy for the Project.

2. Purpose of the personal data processing under the Project

The processing regarding personal data that may occur under the Project will be strictly related to its use for the purposes of (and without prejudice of the fact that in many cases the relevant entities will be legal persons and, as such, the corresponding data used for such purposes will not constitute personal data):

> - sending communications by email to the professional contacts of the potential interested entities related to the relevant calls and events;
>
> - involving the participating entities in the developed activities under this Project;
>
> - executing the due fund transfers for the involved entities under the Project terms and conditions;
>
> - complying with any reporting obligations in relation to the European Commission under the Project.

No personal sensitive data (defined by Article 9 of the GDPR as "data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, (…) genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation") will be collected by the BlockStart project.

3. Personal data categories

As said, under BlockStart, as a Coordination and Support Action, research activities will not be carried out and therefore, the activities to be carried under the Project will not generate, collect or involve the processing of research data, namely, involving and having as research scope personal data.

Nevertheless, in order to manage, execute and implement the Project measures proposed in the corresponding Work Packages, it will create a dataset containing personal data about the professional contacts of data subjects working for and/or representing the entities that participate in the BlockStart's activities (e.g.: DLT developers, SMEs, experts, intermediaries, policymakers), as point of contacts of such entities, for the purposes mentioned above, as well as defined and established in the Work Packages.

Therefore, the only personal data processed by the BlockStart consortium encompasses the following personal data categories:

- full name;

- professional email;

- professional telephone contact;

- country of establishment;

- short CV and/or LinkedIn profile;

- bank accounts of beneficiaries (DLT developers, SMEs, DLT experts), in order to enable the due fund transfers to the aforementioned sub-grantees;

- photo/screen capture and video recording of events (e.g.: ideation kick-offs, workshops, demo days, webinars). Such recordings (e.g.: general perspective of an auditorium/computer screen, video of a beneficiary pitch, testimonials by the participants), to the extent applicable in accordance with the applicable personal data protection laws, will only capture people that had not objected to the use of their image (limited to the promotion of BlockStart's open call and results).

4. Who will have access to personal data

Only the BlockStart consortium parties will have access to the said personal data and, within the BlockStart consortium parties organizations, strictly only its representatives, directors, employees, advisors and/or subcontractors that have a need to know basis, and ensuring that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality. Technical and operational measures will be implemented to ensure that users/relevant data subjects will be able to access, rectify, cancel and oppose processing and storage of their personal data.

5. How long personal data will be stored

The gathered personal data under the Project will be stored by the Controller(s) until the end of the Project (April 2022). Data (including, if strictly needed, personal data processed by the BlockStart consortium parties in accordance with the current terms) needed to answer to potential audits by the European Commission services (e.g.: data that enables the assessment of BlockStart activities' impact), may be kept for up to 5 years after the end of the Project (prospectively until July 2027) and, to the extent applicable, the potential processing of the relevant personal data for such purpose would be supported on the necessity of the consortium parties to comply with an applicable legal obligation to which such entities are subject to hereunder. However, any personal data may always be deleted earlier, if a data subject explicitly requests their records to be deleted and the applicable requirements to the exercise and execution of the right to erasure are fulfilled. In order to follow the principle of data minimization, personal data will be deleted/destructed the earliest possible, in accordance with the applicable criteria and requirements resulting from the applicable personal data protection laws, namely, the General Data Protection Regulation ("GDPR").

6. How personal data will be collected and processed

BlockStart consortium will put into place several measures to ensure full compliance with the applicable personal data protection requirements, namely through:

Personal Data Processing Principles Compliance

Personal data processing will be carried out in compliance with the applicable personal data processing principles, namely:

(i) such processing activities must be lawful, fair and transparent;

(ii) it should involve only data that is necessary and proportionate to achieve the specific task or purpose for which they were collected (Article 5(1) GDPR);

(iii) personal data will be requested only when strictly needed, and only for the purposes stated when personal data is requested. When requesting personal data, disclaimers will be shown, with a clear statement of the purpose of collecting and keeping such information;

(iv) personal data shall be kept accurate and, where necessary, kept up to date; every reasonable step will be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;

(v) personal data storage will be limited for no longer than is necessary for the purposes for which the personal data are processed;

(vi) personal data will be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Compliance with applicable national and EU legislation

All the personal data that will be processed under this Project will be processed in compliance with the applicable international, EU and national law (in particular, the GDPR, applicable national data protection laws and other relevant applicable laws on this matter). All BlockStart consortium partners comply with the applicable national and EU laws in force regarding personal data protection. All BlockStart activities will be carried out in compliance with the GDPR.

Informed consent procedures

Individuals whose personal data is collected by BlockStart consortium partners within the frame of BlockStart Project (namely, through registration on the consortium partner F6S platform, through submission of contact/newsletter sign up/other forms within BlockStart website, and other online tools managed by the BlockStart consortium as, for example, a webinar platform) will be informed, upon collection of such personal data, of the processing terms of their personal data.

Such information knowledge is confirmed by the individual by ticking the box expressly confirming that the individual has taken knowledge of the applicable BlockStart Personal Data Protection Policy (which terms are presented at www.blockstart.eu/data-protection/), where applicable terms to the processing of personal data under the Project is detailed and explained to the corresponding data subject ("Privacy Policy").

In particular, personal data collected through the consortium partner F6S platform will be collected in accordance with the said applicable laws (on that matter, and to the extent applicable, F6S data-related policies are accessible through the following links on the mentioned platform: www.f6s.com/privacy-policy; www.f6s.com/terms; www.f6s.com/data-security; www.f6s.com/cookie-policy; www.f6s.com/cookie-table).

The legal agreements signed within the frame of the BlockStart Project (e.g.: agreements with external evaluators, and sub-grantees - DLT developers and SMEs) include articles concerning the compliance with ethical standards and guidelines, as well as binding such entities to the applicable personal data protection laws requirements.

The contract to be signed with sub-grantees will refer to the obligation to conduct their activities following such principles, in a responsible manner and complying with applicable legislation and H2020 rules and guidelines.

In the case of evaluators, the contract signed includes the signing of a Code of Conduct which, among others, includes the principles of fairness, independence, impartiality, and confidentiality.

The data collected through interviews and focus groups with SMEs, as well as wider surveys sent out to a panel of SMEs across European countries, with data collection including information related to regulatory and supervisory bodies, industry associations, innovation hubs, major companies, major SMEs and innovators, research organisations, legal service providers, consulting service providers,

major funding providers (VC, angel investors, PE, etc.) and under the open call evaluations, will not include personal data collection.

Right to information, access, rectification, erasure, restriction of processing, data portability, object and not to be subject to a decision based solely on automated processing, including profiling

Data subjects whose personal data is being processed under the Project can contact the Project Coordinator (via the contact information in BlockStart Personal Data Protection Policy) to exercise their rights in accordance with the applicable personal data protection laws.

Anonymization/pseudonymization of personal data

Anonymization of the processed personal data under BlockStart will be performed through the use of aggregated and statistical data whenever possible.

The objective of these techniques is to ensure that the data subject is not directly or indirectly identifiable or re-identifiable. Recital 26 of the GDPR establishes that "to determine whether a natural person is identifiable, account should be taken of all the means reasonably likely to be used such as singling out, either by the controller or by another person to identify the natural person directly or indirectly". Assessing what "reasonably likely" means becomes a key point in the risk assessment of re-identification, in which all objective factors and contextual elements will be taken into account. The cost, amount of time required, and available state-of-the-art technology are aspects to be considered when assessing what means are "reasonably likely" to be used in attempting to re-identify data.

It should be recalled that, as the GDPR states, "the principles of data protection should therefore not apply to anonymous information, namely information which does not relate to an identified or identifiable natural person or to personal data rendered anonymous in such a manner that the data subject is not or no longer identifiable. This Regulation does not therefore concern the processing of such anonymous information, including for statistical or research purposes".

To avoid the risk of re-identification, whenever possible, and to minimize it when true anonymization is not possible, the BlockStart Consortium will set up a range of measures and safeguards in relation to the datasets provided by beneficiaries and other entities. The measures consist in limiting access to the datasets (only when needed) and legal agreements in place containing clauses to this effect (compliance with data protection regulations).

Full datasets will be accessible only under certain conditions, when necessary for the implementation of the Project. This will reduce the risk of unauthorised identification of data subjects in the datasets, and will allow a higher control of any misuses of data.

DLT developers will only have access to the SMEs datasets and the right to carry out data processing over them during the Pilot. Unless an additional agreement is reached between SMEs and the DLT developers, the developers have the obligation to delete the data once the Pilot ends.

Selected sub-grantees (both DLT developers and SMEs) will sign a sub-grant Agreement with Bright Pixel as BlockStart Coordinator. This agreement will establish the rights and obligations of the parties. Among others, it will include personal data protection clauses, including:

- the acknowledgement that the sub-grantees will be the data controllers of any new dataset or piece of personal information that the sub-grantees may produce in the course of the Pilot process;

- the obligation not to try to re-identify anonymised data;

- the obligation to delete, at the finalization of the Pilot process, the data to which the sub-grantees has been granted access during the Pilot process, except an agreement is entered into with the SME;

- Declaration of Honour: to be signed at the time of the Sub-grant Agreement. This declaration will, among other topics, include the commitment to comply with data protection regulations and the commitment not to use the data for purposes other than those within the BlockStart framework;

- confidentiality clause: the datasets made available will be classified as "confidential". While the confidentiality clause is irrelevant in personal data protection, its compliance would minimize the harm caused in case of breach of the personal data protection.

7. Description of data flows

BlockStart main data flows result from the activities deriving from four Work Packages (WP): WP2 (Engage), WP3 (Prototype), WP 4 (Pilot) and WP5 (Impact).

Here is a summarized description of the most relevant data flows:

7.1 Data flow 1: Engage

From the beginning of BlockStart Project, until the end of the third open call (10 November 2021), the consortium developed activities under the Engage phase (Work Package 2) that demanded the processing of data (including, in some cases, personal data).

Firstly, in order to define the open call themes and sectors, a Sector analysis activity took place. Each sector were mapped through desk research of public available information covering regulatory and supervisory bodies, industry associations, innovation hubs, big companies, SMEs, developers, entrepreneurs and innovators, research organisations, legal service providers, consulting service providers and major funding providers (VC, angel investors, PE, etc.). Discussions with experts and companies helped validating the information gathered. The professional contacts needed to get in touch with the aforementioned entities were obtained from public sources (company websites and Linkedin accounts) and organization contacts within the consortium partners' network. This activity

resulted in brief one-pagers describing DLT feasibility and potential for DLT in SMEs per key sector, with only aggregated information being presented.

Additionally, a "Do you need blockchain" tool is publicly available, so that SMEs may check their potential for DLT implementation.

With the main sectors defined, BlockStart programme orientations and "Do you need blockchain" tool publicly available, the open call received applications from DLT developers, SMEs and external experts. At least two webinars per call were hold to clarify the conditions of BlockStart open call and programme. When registering for these webinars (via a dedicated page for those particular events, on F6S platform), people wishing to attend needed to provide their name and professional email.

Applications were submitted through F6S platform (www.f6s.com/blockstart), following F6S data-related policies (www.f6s.com/privacy-policy; www.f6s.com/terms; www.f6s.com/data-security; www.f6s.com/cookie-policy; www.f6s.com/cookie-table). Some personal data, mentioned in section "3. Personal data categories" of the present document, was requested, in order to assess the applicants, and contact the selected ones. Applicants were asked to sign a declaration of honour assuring the information provided is true.

Consortium members evaluated the applications of external experts. External evaluators evaluated the applications of DLT developers. Consortium members evaluated the applications of SME adopters.

All evaluators, acting pro-bono or being paid under a subcontractor's contract, had to sign a declaration certifying: (i) that they will perform a confidential, fair and equitable evaluation; (ii) their independence from affiliation; (iii) confidentiality and absence of conflict of interest (disqualifying or potential); (iv) that they will not discuss the proposals with others during the process; (v) strictly, that they will not get in contact with applicants; (vi) compliance with EC rules.

7.2 Data flow 2: Prototype

After the Engage phase, the Prototype stage followed. It started with an Ideation Kick-off, an event organized to connect the 20 (or 23, in case of open call #3) selected DLT developers with 10 SMEs and mentors from the consortium, advisory board and external experts. At the end of the event, 10 DLT developers were selected.

Product and technical development of DLT prototypes took place in the following 4 months, with the developments done by the 10 selected DLT being continuously validated by the consortium and potential users, through meetings and mentorship.

DLT developers were asked to sign a sub-grantee contract, provide legal documentation that verifies their existence as an entity, proof of bank account, a summary of their activity (describing solution, process and development log) and a payment request, in order to receive a grant for the Prototype development.

Professional contacts of all aforementioned participants were vital to allow the Ideation kick-offs and remaining Prototype activities.

7.3 Data flow 3: Pilot

In the third and last stage of BlockStart's call process, the consortium evaluators determined which 5 (or 6, in the case of open call #3) DLT solutions developed during the Prototype should be selected to continue to Pilot stage. A group of 20 (or 22, in case of open call #3) SMEs was selected. During the development of the Pilots, DLT developers are encouraged to agree with individual SMEs on a "collaboration strategy" (e.g: exclusive use, discounted use or free use of DLT solutions for an initial period).

Throughout the development and implementation of the Pilots in the SMEs, consortium partners work as facilitators of the relationship between all parts involved. This follow-up is operationalized namely through meetings and bi-weekly updates with DLT developers.

In the end, successful Pilots are presented in a public Demo Day event, targeting investors, SMEs and other potential clients, industry associations and other types of intermediaries.

A public DLT solutions portfolio (basic information about the projects) and public Beneficiaries dataset (including list of entities who signed a sub-grantee contract, project description and funding received) are due at the end of each BlockStart open call, showcased on BlockStart's website.

7.4 Data flow 4: Impact

Taking place in parallel to Engage, Prototype and Pilot phases of each call, "Work Package 5 - Impact" includes a set of initiatives devised to disseminate the lessons learned throughout BlockStart.

One of the cornerstones of the Impact Work Package is creation of Sector specific DLT maturity assessments. These mainly consist in public reports about the potential for DLT implementation in specific sectors, with aggregated and statistical data based on desk research, surveys to SMEs and intermediaries, use of "Do you need blockchain" tool by SMEs, Prototype and Pilot developments and feedback from participant DLT developers and SMEs. These reports are disseminated through BlockStart website and directly to potentially interested stakeholders, like government organizations, legal bodies, SMEs and industry associations.

Besides the document format itself, reports also sustain the creation of training resources like webinars/workshops to interested intermediaries (governmental agencies, research institutions, acceleration/incubation programmes and other agents detected throughout BlockStart). These trainings are disseminated through BlockStart online platforms, consortium members websites and social media channels, presence at events devoted to DLT/Blockchain and directly to intermediaries whose contacts are publicly available. The ultimate goal is to empower intermediaries to help in the promotion of DLT adoption by SMEs.

Best practices and recommendations deriving from BlockStart are also shared with policymakers, aiming to clarify the Blockchain phenomenon, thus facilitating the development of a compelling regulatory framework and government support activities. This should be achieved not only through reports, but also the organization of a policy conference by February 2022, for which will be invited

entities like national governments, relevant ministries (Economic, Finance, Transportation, etc.), Central Banks, Industry associations (Banking, Financial Services, Insurance, Fintech), representatives of European Central Bank, European Banking Authority, European Security and Market Authority, European Insurance and Occupational Pension authority, and other European and national authorities. BlockStart consortium will make these invitations through the public contacts available in the aforementioned institutions websites, and the training initiatives will, by default, share aggregated information. If a particular use case (referring to an organization, never an individual person) deserves that an exception is applied to this principle, it will always need to be accompanied by an explicit consent by the corresponding organization.

8. Datasets

The datasets resulting from the BlockStart's data flows described in the previous section ("7. Description of data flows") are presented in the tables below, each including the following fields:

- **Dataset reference:** a unique reference to each of the datasets
- **Relevant work package(s)**
- **Description of the dataset**
- **Data utility:** to whom could the data be useful and the reason why it is worth generating, keeping and/or sharing
- **Type:** collected, generated
- **Nature:** text, numbers, image, video, etc.
- **Scale:** the expected size of the dataset in MB/GB
- **Origin:** where does the data in the dataset come from, from which sources it has been collected
- **Archiving and storage:** where the data will be stored
- **Data sharing policy:** stakeholders with whom the data will be shared
- **Preservation time**
- **Additional preservation cost**

8.1 Approached entities

Table 1 - Dataset Approached entities:

Dataset reference:	BS-1
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot, WP5 Impact
Description of the dataset:	Entity, name (when available), professional email, other professional contacts (e.g. LinkedIn) and other elements which may help defining the initiative that may be relevant to each entity/person. These entities may me startups, SMEs, associations, incubators/accelerators, investors, media, experts, policymakers and other intermediaries
Data utility:	Database of people potentially interested in participating in BlockStart's initiatives, like open calls for DLT developers, open calls for SME adopters, call for expression of interest from external Evaluators, interviews to provide info for reports, surveys to provide info for reports, DLT Assessment tool, open/public events like webinars/workshops/Demo Days, communities on Slack and Telegram, possible collaborations (e.g. as external mentors, Advisory Board members), among other, enabling the consortium to define a target groups per initiative, and send the corresponding invitations
Type:	Collected
Nature:	Mainly text format
Scale:	Small (approximately 500MB)
Origin:	Contacts resulting from consortium members' networks, desk research of contacts publicly available online or interactions within the project's activities (e.g.: events)
Archiving and storage:	Dedicated spreadsheet in project's Google Drive (accessible only to consortium members)
Data sharing policy:	Internal
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.2 Applicants

Table 2 - Dataset Applicants:

Dataset reference:	BS-2
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot, WP5 Impact
Description of the dataset:	Name, professional contacts and other data (described in section "3. Personal data categories" of this document) needed to contact and assess applicants - DLT developers, SME adopters and external evaluators
Data utility:	Personal data needed to contact DLT developers, SME adopters and external evaluators, in order to better assess them (during open call selection stage), and to connect with the selected ones (in the scope of the Prototype and Pilot stages). Answers to the open call application forms will be instrumental to support the decision on which beneficiaries are the best fit to BlockStart program
Type:	Collected
Nature:	Mainly text format, images/schemes in some cases
Scale:	Small (approximately 500MB)
Origin:	Applications through F6S platform (www.f6s.com/blockstart)
Archiving and storage:	F6S platform (www.f6s.com/blockstart), dedicated spreadsheets and folders in project's Google Drive (accessible only to consortium members)
Data sharing policy:	Mixed: - Public, shared in www.blockstart.eu: DLT solutions portfolio (description about the selected beneficiaries/projects - DLT developers webpages, SME adopters webpages, Deliverable 4.1 and Deliverable 4.2 on deliverables webpage), Beneficiaries dataset (including list of entities who signed a sub-grantee contract and corresponding funding received – Deliverable 1.6 and Deliverable 1.7 on deliverables webpage) - Internal, only shared within consortium members: applicants'/beneficiaries' contacts and application submissions (answers and documents uploaded via F6S forms)
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.3 Applicants' ratings

Table 3 - Applicants' ratings:

Dataset reference:	BS-3
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot
Description of the dataset:	Numerical and categorical ratings of the open call applications, based on the criteria presented in the open call documentation
Data utility:	Support the selection of BlockStart's beneficiaries (DLT developers and SME adopters) and subcontractors (external evaluators), based on the criteria in each call's Annex 2 Guidelines for Applicants, available on BlockStart's website
Type:	Generated
Nature:	Mainly text format
Scale:	Small (approximately 100MB)
Origin:	Applications through F6S platform (www.f6s.com/blockstart)
Archiving and storage:	Dedicated spreadsheets in project's Google Drive (accessible only to consortium members)
Data sharing policy:	Internal
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.4 Beneficiaries

Table 4 - Dataset Beneficiaries

Dataset reference:	BS-4
Relevant work package(s):	WP2 Engage
Description of the dataset:	Professional contacts of beneficiaries, and information about each beneficiaries' entity/project
Data utility:	Professional contacts needed to communicate with the selected beneficiaries. Information about each beneficiaries' entity/project publicly available on BlockStart's website, enabling the dissemination of the results of each project and BlockStart program as a whole)
Type:	Collected
Nature:	Text, image and video format
Scale:	Medium (approximately 5GB)
Origin:	Submissions via F6S platform (www.f6s.com/blockstart). Further entities'/projects' descriptions directly provided by the beneficiaries (by email)
Archiving and storage:	F6S platform (www.f6s.com/blockstart) and dedicated spreadsheets and folders in project's Google Drive (accessible only to consortium members) for whole data (including the confidential presentations and contacts). BlockStart's website and YouTube channel for the beneficiaries/projects information to be publicly available
Data sharing policy:	Mixed: - Internal, only shared within consortium members: applicants'/beneficiaries' contacts and application submissions (answers and documents uploaded via F6S forms) - Public, shared in www.blockstart.eu: DLT solutions portfolio (description about the selected beneficiaries/projects - DLT developers webpages, SME adopters webpages, Deliverable 4.1 and Deliverable 4.2 on deliverables webpage), Beneficiaries dataset (including list of entities who signed a sub-grantee contract and corresponding funding received – Deliverable 1.6 and Deliverable 1.7 on deliverables webpage)
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.5 Public webinars registrants and participants

Table 5 - Dataset Public webinars registrants and participants:

Dataset reference:	BS-5
Relevant work package(s):	WP2 Engage, WP4 Pilot, WP5 Impact
Description of the dataset:	Name and professional email of people interested in watching the open/public events like webinars/workshops/Demo Days
Data utility:	Professional contacts are needed to share the weblink allowing access to the webinars.
Type:	Collected
Nature:	Text format
Scale:	Small (approximately 500MB)
Origin:	Registrations in webinars through dedicated pages for the event at the F6S platform (www.f6s.com/blockstart), Zoom or Facebook
Archiving and storage:	Dedicated areas in BlockStart's F6S account, Zoom and GDrive (accessible to consortium members)
Data sharing policy:	Mixed (email of participants only shared within consortium members, name of registrants showcased in the dedicated events' pages on F6S and Facebook)
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.6 Private webinars registrants and participants

Table 6 - Dataset Private webinars registrants and participants:

Dataset reference:	BS-6
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot
Description of the dataset:	Name and professional email of people interested in participating in the private events like Ideation Kick-offs and presentations to the jury
Data utility:	Professional contacts are needed to share the weblink allowing access to the events
Type:	Collected
Nature:	Text format
Scale:	Small (approximately 500MB)
Origin:	Professional emails obtained through the application submissions via F6S forms (www.f6s.com/blockstart), other contacts directly indicated by the selected beneficiaries (by email) of other people from their entity to whom BlockStart team should send invites to participate in the private events
Archiving and storage:	Dedicated areas in BlockStart's F6S account, Zoom and GDrive (accessible to consortium members)
Data sharing policy:	Internal
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.7 Public webinars recordings

Table 7 - Dataset Public webinars recordings:

Dataset reference:	BS-7
Relevant work package(s):	WP2 Engage, WP4 Pilot, WP5 Impact
Description of the dataset:	Video recording of the open calls' Q&A webinars, webinars for intermediaries and policymakers and Demo Days
Data utility:	Enabling people/entities potentially interested to discover more about the program and each teams/projects, in more convenient times (and not necessarily when it is streamed live)
Type:	Generated
Nature:	Video format
Scale:	Medium (approximately 5GB)
Origin:	Recording of events' video
Archiving and storage:	Dedicated areas in BlockStart's Zoom and GDrive (accessible to consortium members)
Data sharing policy:	BlockStart's website and public YouTube, Vimeo and Facebook channels
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.8 Private webinars recordings

Table 8 - Dataset Private webinars recordings:

Dataset reference:	BS-8
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot
Description of the dataset:	Video recording of the Ideation Kick-offs and Q&A sessions for selected beneficiaries (e.g. to present the guidelines and clarify doubts about the Ideation Kick-off, Prototype and Pilot stages)
Data utility:	To allow the jury to revisit the beneficiaries presentations, allow selected beneficiaries (the ones who attended, and the ones who weren't able to participate in the live events) to check the instructions and clarifications by BlockStart team, and for the purpose of audits by the European Commission
Type:	Generated
Nature:	Video format
Scale:	Medium (approximately 5GB)
Origin:	Recording of events' video
Archiving and storage:	Dedicated areas in BlockStart's Zoom and GDrive (accessible to consortium members)
Data sharing policy:	Internal
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.9 Surveys' and interviews' participants

Table 9 - Dataset Surveys' and interviews' participants:

Dataset reference:	BS-9
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot, WP5 Impact
Description of the dataset:	Name and professional email of people providing feedback/insights to BlockStart's initiatives like public events (webinars/Demo Days), BlockStart's 3 stages (Ideation Kick-offs, Prototype and Pilot), submissions to "Do you need blockchain?" tool, responses via surveys or interviews for deliverables/reports like Sector Analysis, Programme orientations, DLT maturity assessments and Policy Recommendations
Data utility:	Provide feedback/insights to BlockStart's initiatives like public events (webinars/Demo Days), BlockStart's 3 stages (Ideation Kick-offs, Prototype and Pilot), and deliverables/reports like Sector Analysis, Programme orientations, DLT maturity assessments and Policy Recommendations
Type:	Collected
Nature:	Text format
Scale:	Medium (approximately 2GB)
Origin:	Survey submissions via Typeform and Google Forms, meeting minutes of interviews with experts
Archiving and storage:	Dedicated areas in BlockStart's Typeform, Google Forms and GDrive (accessible to consortium members)
Data sharing policy:	Mixed (internal/private, except the inclusion of the names and quotes of experts who were interviewed for the reports, and statements from the experts who presented at the public events, when there was clear consent from those persons to share those elements publicly)
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

8.10 Community members

Table 10 - Dataset Community members:

Dataset reference:	BS-10
Relevant work package(s):	WP2 Engage, WP3 Prototype, WP4 Pilot, WP5 Impact
Description of the dataset:	Name, professional email and phone (not all are mandatory) of people interested in joining BlockStart's Slack community, Telegram community and newsletter database
Data utility:	Registration needed to participate in the Slack and Telegram communities, and receive BlockStart's newsletters
Type:	Collected
Nature:	Text format
Scale:	Small (approximately 500MB)
Origin:	Registrations in Slack, Telegram and newsletter
Archiving and storage:	Dedicated areas in BlockStart's Slack, Telegram and MailChimp accounts (accessible to consortium members)
Data sharing policy:	Mixed (name of the participants showcased in Slack and Telegram communities; other fields only disclosed to the remaining participants in Slack and Telegram communities if the person/registrant wishes to do so; emails submitted to newsletter database only accessible by the consortium members)
Preservation time:	Until the end of the project (April 2022). Data needed to answer to potential audits by the European Commission services may be kept for up to 5 years after the end of the Project (July 2027)
Additional preservation cost:	None

9. Security

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the BlockStart Consortium partners will implement and ensure appropriate technical and organisational measures to ensure a level of security appropriate to the risk, namely, personal data will be, to the extent possible and necessary, anonymised in order to transform

it in ordinary data (non-personal data) and, as such, be statistically compiled for the purpose of the project.

To prevent unauthorised access to personal data or the equipment used for processing personal data, following security measures will be implemented:

-      all personal data will be safely stored in the password-protected accounts of the F6S platform where the data is held (following F6S data-related policies: www.f6s.com/privacy-policy; www.f6s.com/terms; www.f6s.com/data-security; www.f6s.com/cookie-policy; www.f6s.com/cookie-table), and other online platforms (e.g: Typeform for the DLT Assessment Tool, Zoom for the webinars). In any circumstance, all personal contacts stored in whichever platform (always password-protected) will only accessible by people from the consortium working in the scope of BlockStart project;

-      no personal data should be locally stored in any computer disk;

-      all computers must be protected (only accessible through fingerprint or password).

Moreover, the BlockStart platforms/repository can only be accessed, upon request, by members of the Project consortium. The emails of the person requesting access must be listed in the project staff. If the status of a team member is changed to "not involved" or similar, the access will be revoked. By revoking access, the system can only automatically ensure that the person will not have access to the contents of the platforms/repository. It is not possible to ensure that documents or data that have been downloaded are deleted.

In order to prevent data breaches in case of theft of any of the tools used to access the BlockStart repository, all team members are requested to minimize the number of documents downloaded. Additionally, all team members are invited to adopt appropriate security measures to protect computers, laptops, mobile phones and similar tools to prevent unauthorized access in case of leaving the tool unattended or in case of loss or theft.

10. Ethics

The personal data processing operations to be carried out under this project are not subject to opinions and/or approvals by ethics committees and/or public authorities, but merely subject to compliance with applicable legal framework related to personal data protection (namely, GDPR).

11. Further clarification

Information on BlockStart's personal data protection policy may be found at www.blockstart.eu/data-protection/.

12. Conclusion

The current Data Management Plan aimed to present the principles and measures the consortium have adopted and will continue to adopt to ensure the compliance of BlockStart's prospective data flows with legislation on personal data protection.

Starting with the purpose of personal data processing, it will be strictly limited to the execution of the Project's activities included in the respective Grant Agreement's Work Packages, and no personal sensitive data will be collected.

The gathered personal data will be deleted the earliest possible, in accordance with the BlockStart activities and the applicable criteria and requirements resulting from the applicable personal data protection laws, namely, the GDPR. If it is absolutely needed, it may be kept until the end of the project (April 2022) or, if the data happens to be needed to answer potential audits, up to 5 years after the end of the project (prospectively July 2027).

Among the principles to be followed by the consortium on data processing are included data minimization, compliance with national and European legislation, data subject information procedures, right to access and correct personal data and, whenever possible, the anonymization/pseudonymization of personal data.

In order to prevent unauthorised access to personal data or the equipment used for processing personal data, several security measures will be implemented all throughout the Project by the consortium parties, namely the storage of personal data in password-protected accounts of F6S platform.

BlockStart's data flows and datasets resulting from the activities developed within the Project's Work Packages (with special emphasis in Engage, Prototype, Pilot and Impact) were also explained in detail in this deliverable.