

PRIVACY POLICY (B)

Scientific or Research-Focused Data Collection (e.g., interviews with external actors, stakeholders, focus groups)

GENERAL

We are GREENOVATE! EUROPE, with registered address Avenue Louise 231, 1050 Brussels (referred to herein as “we”, “us” or “our”). This Privacy Policy explains how we process personal data in the context of **research activities** undertaken as part of the **NEXRUR** project (Grant Agreement No. 101181273). It applies to individuals who participate in research-related activities such as interviews, surveys, focus group discussions, participatory observation, fieldwork and similar engagements for scientific purposes. The purpose of this Policy is to ensure that you are informed about how and why your data will be collected, how it will be protected, and what rights you have in relation to it.

For the purposes of the GDPR and UK GDPR, we act as the **controller** for the processing operations described herein. Where research is conducted jointly with other consortium partners, each partner may act as an independent controller for the data it collects, or we may act as joint controllers for specific tasks. Where relevant, the roles and responsibilities for data protection will be clarified in the participant information sheet or consent form made available to you.

PURPOSES AND BASIS FOR THE PROCESSING OF YOUR DATA

We process your personal data primarily for **scientific research** within the scope of NEXRUR. This includes, without limitation: (i) planning and conducting qualitative and quantitative data collection through interviews, surveys, focus groups and participatory observation; (ii) analysing data to understand stakeholder perspectives, practices, constraints and opportunities in relation to sustainable rural business models, resilience strategies and innovation processes; (iii) developing and validating tools, frameworks, indicators and strategies useful for policy, practice and further research; (iv) preparing academic publications, reports, deliverables and communication materials; and (v) demonstrating accountability and ethical compliance in line with funder requirements.

The principal legal basis for research processing is **your consent** (GDPR Art. 6(1)(a)), which we will request in a clear and specific manner before you participate. Depending on the nature of the research and the applicable national frameworks, we may additionally rely on **public interest in the area of scientific research** (GDPR Art. 6(1)(e) in conjunction with Art. 89) or **legitimate interests** (GDPR Art. 6(1)(f)), provided your rights and freedoms are not overridden. If we foresee the collection of **special categories of data** (GDPR Art. 9), such as opinions that could indirectly reveal political beliefs, trade-union membership or health-related information, we will only process such data where strictly necessary for the research purpose and subject to your **explicit consent** and appropriate safeguards (e.g., pseudonymisation, access limitations, secure storage and minimisation).

In addition to the primary research purposes of NEXRUR, and subject to your consent, your anonymised or pseudonymised data may be used for future scientific research beyond the timeframe of this project. Such future use will always respect GDPR safeguards, meaning that only sufficiently anonymised data—or pseudonymised data with strict access controls—will be retained for secondary analysis, comparative studies, or for informing follow-on research projects. You may choose whether to allow this future use when giving your consent, and refusal will not affect your participation in NEXRUR.

CLEAR CONSENT FOR PUBLICATION (NON-ANONYMISED DATA)

Our default approach is to **anonymise** research data prior to dissemination or publication so that you cannot be identified. However, circumstances may arise where anonymisation would significantly diminish the scientific value (e.g., direct quotes attributed to a named expert, identifiable photographs from a case context, or audio/video materials used for illustrative purposes). In such cases, we will **inform you clearly and in advance** and request your **separate, explicit consent for publication** of non-anonymised data. This consent will specify exactly what will be published, where, for what purpose, for how long, and your right to refuse or later withdraw consent (noting that withdrawal may not be able to undo publications already disseminated). Your participation in the research will **not** be adversely affected if you choose not to consent to publication of identifiable data.

DATA WE COLLECT ABOUT YOU

The categories of personal data collected will depend on the research activity and may include:

- (a) Identification and contact details (e.g., name, email, telephone), used to organise interviews, send information sheets, schedule sessions and share transcripts for review where applicable;
- (b) Professional information (e.g., your organisation, role, responsibilities, sector, relevant experience and expertise), collected to contextualise research findings;
- (c) Interview and survey responses (including opinions, narratives, experiences and qualitative insights), which may be audio-recorded or transcribed with your informed consent;
- (d) Audio-visual materials (e.g., recordings, photographs or video captured during research activities), obtained only where necessary for research purposes and subject to your consent;
- (e) Observational notes produced by researchers during participatory activities or fieldwork;
- (f) Communications regarding scheduling, clarifications and follow-up;
- (g) Technical data where online tools are used (e.g., connection metadata), captured to ensure secure and effective delivery of remote sessions.

Where possible and appropriate, we will employ measures such as **pseudonymisation** and separation of key identifiers from content data to reduce privacy risks, especially before analysis and sharing within the research team.

DISCLOSURE OF YOUR INFORMATION

Your personal data may be shared strictly on a need-to-know basis with: (i) researchers and authorised staff within the NEXRUR consortium who are involved in the relevant work packages; (ii) third-party processors providing secure services such as transcription, survey platforms, cloud storage or video-conferencing systems, all acting under our instructions and subject to Data Processing Agreements; (iii) the European Commission or relevant agency for monitoring, audit or review processes; and (iv) ethics committees, where review or oversight is required. We do not sell or rent your personal data. Any sharing will be limited to what is necessary and proportionate to the research tasks, taking into account confidentiality undertakings and applicable ethical standards.

INTERNATIONAL DATA TRANSFERS

If it is necessary to transfer data outside the EEA or UK (e.g., due to the location of a secure cloud processor or a collaborating institution), we will implement appropriate safeguards, which may include EC **adequacy decisions**, **Standard Contractual Clauses** or reliance on certified frameworks such as the **EU-US Data Privacy Framework**. We will inform you, upon request, about the specific safeguards relevant to your data.

DATA RETENTION

We will retain personal data for no longer than is necessary for the purposes of the research and in line with applicable legal and ethical requirements. In general, **interview recordings** will be **deleted within 90 days** of collection, unless you have explicitly consented to an extension for quality assurance or publication purposes. Transcripts may be retained for the time required to complete analysis and validation, after which they will be **anonymised or pseudonymised** where feasible. **Anonymised datasets** that no longer enable identification may be preserved for archiving, transparency and secondary analysis consistent with research ethics and legal requirements. Where data must be retained to meet funder audits or reporting obligations, we will apply storage limitation and access controls to minimise any impact on your rights.

DATA SECURITY

We adopt **appropriate technical and organisational measures** to safeguard research data, proportionate to the sensitivity and risk. These may include access control based on roles and research need, secure user authentication, encryption in transit and at rest, logically separated storage for identifiers and content, systematic backups and tested restoration, restricted sharing with watermarking or expiring links where applicable, and documented procedures for handling data breaches in line with legal notification requirements. Researchers and staff receive training on confidentiality, data protection and ethical conduct, and must follow internal protocols set out in the Data Management Plan and relevant Standard Operating Procedures.

YOUR RIGHTS

Under the GDPR and UK GDPR, you have the right to request **access** to the data we hold about you, request **rectification** of inaccuracies, request **erasure** of your personal data where there is no compelling reason for its continued processing, request **restriction** of processing in legally specified circumstances, **object** to processing on grounds relating to your particular situation (especially where based on legitimate interests or public task), and exercise **data portability** where technically feasible and legally applicable. Where processing is based on your consent, you have the right to **withdraw consent** at any time, without affecting the lawfulness of processing carried out before withdrawal. You may exercise your rights by contacting greenovateeurope@gmail.com.

CONTACT AND COMPLAINTS

If you have any questions, comments or requests regarding this Privacy Policy or the handling of your personal data in research activities, please contact greenovateeurope@gmail.com.

[ONLY WHEN APPLICABLE] You can contact our Data Protection Officer at.

You also have the right to lodge a complaint with your national **supervisory authority** if you believe your data protection rights have been violated.

CONSENT TO PARTICIPATE AND CONSENT FOR PUBLICATION

Prior to participating in research activities, you will receive a **Participant Information Sheet** explaining the nature, scope and implications of the research. Your **consent to participate** will be obtained in writing (or electronically) and will cover, where relevant, (i) participation in interviews/surveys/focus groups; (ii) permission to audio- or video-record the session; and (iii) permission to contact you for follow-up or clarification.

In addition, where we propose to use **non-anonymised** materials for publication or dissemination (e.g., identifiable quotes, photos, audio/video), we will request a **separate and explicit Consent to Publication**, specifying the exact content to be published, its intended audience and channels (e.g., academic journals, project website, policy briefs), the duration of

use, and your right to refuse or withdraw your consent. Declining publication consent will not affect your participation in the research.

ANNEX 1

I consent to the use of my anonymised/pseudonymised data for future scientific research beyond the NEXRUR project timeframe.

Consent to Participate (Research Activities)

“I have read and understood the Participant Information Sheet for the NEXRUR research activity. I have had the opportunity to ask questions and have received satisfactory answers. I voluntarily agree to participate. I understand that I may withdraw at any time without penalty and without giving a reason.”

I consent to participate in the research activity.

I consent to audio/video recording for research purposes.

I consent to be contacted for follow-up.

Consent to Publication of Non-Anonymised Data (if applicable)

“I understand that the default is anonymisation. I have been informed that the following identifiable materials are proposed for publication or dissemination: [description]. I consent to the publication and use of these materials for the purposes and channels described in the Consent to Publication form. I understand that I can refuse or withdraw my consent at any time, although withdrawal may not affect materials already disseminated.”

I give explicit consent to publish the described non-anonymised materials.

Place/Date/Signature (or electronic acknowledgement)