

# INFINITY Data Protection Notice

## Information for the processing of personal data in accordance with art. 14 GDPR

The purpose of this data protection notice is to inform data subjects about the processing of their personal data as required under article 14(1) GDPR. Considering the technical nature of the module and limitations imposed by the research design (i.e., scale), it is considered that informing those data subjects directly would involve a disproportionate effort. In such cases, article 14(5) GDPR allows an exemption from article 14(1) requirements, subject to the conditions and safeguards referred to in Article 89(1) GDPR, the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available. For this reason, this information is made publicly available via the project's website in accordance with art. 14 GDPR and with its potentially applicable derogations (art. 14 (5) (b) GDPR<sup>1</sup>), as an effort of enabling the data subjects to be informed about the data processing and to exercise their rights. This notice refers to the specific module of the INFINITY platform responsible for the collection of data from online sources.

Textual data (mainly twitter posts relevant to crisis events) will be downloaded and processed from publicly available datasets, e.g. *CrisisLexT26*.

### 1. The Project

INFINITY is a 39-months Horizon 2020 EU project (GA 883293) that aims to transform the traditional idea of criminal investigation and analysis using immersive and collaborative environments. INFINITY's concept is based around four core research and technical innovations that together, will provide a revolutionary approach and convert data into actionable intelligence. The primary goals of INFINITY are to revolutionise data driven investigations using artificial intelligence, machine learning and big data analytics and to facilitate effectiveness of an investigation and utilise modern innovations in virtual reality, augmented reality, and visual analytics in order to facilitate a better intelligence cycle. On a collective level, the immersive collaborative environment offered by INFINITY will enable co-located and remote Law Enforcement Agencies' (LEA) cooperation in ways that have not yet been realised. This end-to-end system for LEA operations will cover the full investigative cycle, including generating reports for decision-makers and admissible evidence to demonstrate to juries and judges. Ultimately, the solutions offered by Infinity will propel LEAs ahead of traditional and evolving complex, hybrid and transnational threats and protect the societies they serve.

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<sup>1</sup> Paragraph 5 (b) of this Article provides for an exemption if such information proves impossible or would involve a disproportionate effort, for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. In this case, subject to the conditions and safeguards referred to in Article 89(1) GDPR, the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available.

## **2. Data Controller**

The Centre for Research & Technology – Hellas (6th km Harilaou - Themi, 57001, Themi-Thessaloniki, Greece) is the Data Controller. Each of the Pilot Use Cases (PUCs) has a dedicated leader and Data Protection Officer (DPO); for further details on the applicable DPO to your data request, please contact AIRBUS as the project's Coordinator.

## **3. Data Processing**

The purpose of data processing in this project is to test and illustrate the functionalities of the Event Detection module developed within INFINITY project. This module aims to analyse textual data coming from publicly available datasets so as to detect event related content.

### **What personal data is being processed?**

The following categories of personal data publicly available are being processed:

- Tweet posts, including the language, textual content, hashtags and retweets;
- Social media account information: the username and location;
- Social media account interactions, including user mentions

No special categories of personal data (art. 9(1) GDPR) are foreseen to be collected (at least not intentionally), nor data relating to criminal convictions (art. 10 GDPR). In any case and in accordance with the data minimisation principle, only the parts of the social media posts that are deemed necessary for the project's objectives will be processed subject to a privacy-by-design technique. All data will be collected in accordance with the licences and terms & conditions of the respective data providers. All data will be gathered only from publicly available datasets, respecting the relevant permissions and in compliance with the respective terms of use, including the ones referred explicitly to the terms of use on behalf of minors, thus in accordance with user expectation of privacy. All collected data will be pseudonymised by replacing any name mentioning with @<tag>. Data minimisation principle will be also adhered to, i.e., only data that are strictly necessary for the purposes of the project will be processed.

### **What is the purpose of the processing?**

As aforementioned, the purpose of data processing in this project is to test and illustrate the functionalities of the Event Detection module that is developed within INFINITY project. The above data will be required for the duration of the project: (i) for scientific research purposes, (ii) to facilitate the functionality of other modules of the project, and (iii) for demonstration purposes.

### **Data security**

The INFINITY project implements appropriate technical and organizational measures to ensure an appropriate level of protection against the risks arising from processing, such as accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access. All data will be collected in accordance with the licences and terms & conditions of the data providers. In accordance with

the data minimisation principle, only the parts of the social media posts that are deemed necessary for the project's objectives will be processed subject to a privacy-by-design model, while the rest of the posts 'contents (irrelevant for the purposes of the project) will be deleted immediately. The database (comprising of only the relevant parts of social media posts) will be stored in a password and firework protected environment. This database will only be accessible to the authorised users that can access only the stored data (in the pseudonymised form) to fulfil their tasks.

### **Will the collected data be shared? Who will be responsible for all of the data when this study is over?**

The collected personal data may be disclosed: (1) to all partners of the Consortium, through a password protected system; and (2) if this is required to third parties (including data processors if exist) for the fulfilment of our legal obligations or is necessary for the fulfilment of the above data processing purposes and is in compliance with the applicable legal framework. It is also highlighted that no personal data will be transferred outside the European Union (EU) or the European Economic Area (EEA). When this study is over, CERTH/ITI will be the only one responsible for the information collected.

### **How long will data be stored?**

The storage duration of the data in their anonymised or pseudonymised form will be the duration of the project plus five (5) years after the end of the project (the ending date being 31 August 2023), to be available for demonstration in case of an inspection or an audit, as long as required to achieve the above purposes of processing, unless a longer retention period is required by law or for the establishment, exercise or defense of legal claims.

### **Will the collected personal data be used for other purposes?**

All personal data collected in INFINITY (see section 3: What personal data is being processed?) will not be processed for any other purposes outside of those specified in this document.

### **Will the collected data be processed by automated tools supporting decision-making?**

Data collected from you will only be used to test the capabilities of the INFINITY tools and no process by automated tools supporting decision-making will take place.

### **What are your rights?**

Your rights under GDPR are contained within articles 12-23 and 77. Some of your most important rights include:

- *Right to information:* you may request information about whether we hold personal information about you, and, if so, what that information is and why we are holding it. This information shall be provided within a reasonable period after obtaining the personal data request, but at the latest within one month of receipt of the request.
- *Right to access:* you may request to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- *Right to rectification:* you may ask us to rectify the information that we hold about you in case you consider that something is missing or is incorrect.

- *Right to erasure*: based on the grounds laid out in Art 17, you may ask us to erase your personal data at any given moment without a specific reason.
- *Right to object*: you may request us to stop processing your personal data based on the legal ground stated in Art 21 GDPR.
- *Right to data portability*: you have the right to request the transfer of your personal data in an electronic and structured form to another party or directly to you. This enables you to take your data from us in an electronically usable format and to be able to transfer your data to another party in an electronically usable format.
- Lodge a complaint with the Hellenic Data Protection Authority (<https://www.dpa.gr>).

Please note that the aforementioned rights may be restricted in the light of the GDPR (e.g. art. 89 par. 2) or other applicable data protection legislation.

For the exercise of your rights and for any other data-related information you may contact us at [m4d\\_ethics@iti.gr](mailto:m4d_ethics@iti.gr)