

ReSilence 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. 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. 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) GDPR¹), 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 ReSilence project responsible for collection of data from online sources.

Data will be collected from:

- i. Social Media (e.g. YouTube), where only specific values (e.g. video_id, description, comments text, tags and metadata) will be collected
- ii. Content from the surface web (text and audiovisual), where the relevant searches will be restricted to specific keywords as required by the nature of the research.

1. The Project

The main objective of the ReSilence project is to support the development of art-driven technologies for designing the soundscape of future cities through the collaboration of artists, architects, urban designers, scientists, engineers and researchers. ReSilence focuses on supporting the development of art-driven technologies for designing the soundscape of future cities targeting AI and XR tools addressing primarily challenges from the Urbanism/Mobility sector while exploring the borders between music, noise, and user experience measurements assessing a soundspace. The data collection will be developed for creating a toolkit, which will become available to the artists participating in ReSilence project, offering various tools that they may choose to integrate to their prototypes

2. Data Controller

Data Controller and project coordinator: Centre of Research & Technology – Hellas (6th km Harilaou - Themi, 57001, Themi- Thessaloniki, Greece)

¹ 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.

3. Data Processing

The purpose of data collection in this project is to a) identify aspects of videos: The comments will be used to automatically identify different topics or aspects that were discussed in the comments. This will be achieved by grouping comments that were similar together using a graph clustering algorithm; b) Understanding sentiment towards those aspects: Once the comments will be grouped by aspect, a large language model (LLM) was used to analyse the sentiment of the comments within each group. This allows to identify the topics being discussed and understand the overall feeling (positive, negative, neutral) commenters have towards those topics. With respect to the processing of personal data, the applicable legal ground for such processing activities is the legitimate interest of the data controller (CERTH/ITI) pursuant to Article 6(1)(f) GDPR. and Article 14(2)(b)); the processing is necessary for the scientific purposes described in Section 3.2.

What personal data is being processed?

The following categories of personal data publicly available will be processed: social media posts (i.e., YouTube video metadata, YouTube comments), including the textual content, tags, whether the comment is a reply to another comment, as well as the number of likes;

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, while the majority will be deleted immediately. All data will be collected in accordance with the licences and terms & conditions of the data providers. All data will be gathered only from public accounts, with the permission defined by the social media platforms/Web forum communities 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. Data minimisation will also be applied, i.e., only data that are necessary for the purposes of the project will be processed. Further, details are provided in the "What is the purpose of the processing" section.

What is the purpose of the processing?

The purpose of the processing is to uncover viewers' opinions on various aspects of the videos through automatic topic discovery and sentiment analysis of those topics. [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

CERTH, 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 collected and processed will

stem from publicly available sources. The posts will be either downloaded as JSON files and stored in a secure database, after being properly pseudonymised, or in the forms of URLs. If, however, the user decides, at any time, to hide or delete it, CERTH is obliged to remove the post from its URL collection too, as soon as possible, since these posts will be deleted from the original SM user, and then CERTH will not have any further access to them (URL will lead to a broken outlet). No personal information or account details of the owner of the posts will be processed at any stage of the analysis. The data collected from the relevant social media will be pseudonymised. The username will be hashed during collection (implementing the privacy by design principle), based on a one-way cryptographic hash function (e.g., SHA 256), ensuring that from the derived hash value it is infeasible to obtain the original username, while the content of the social media posts will remain as is. 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, while the majority will be deleted immediately. After the end of the activities, all personal data will be immediately transferred to encrypted and/or secure and password protected servers or devices, within the organization's premises, which will be only accessible to authorized individuals with a unique set of usernames and passwords. The metadata of the social media and the webpages will be also stored to a local database that is secured (authentication mechanisms will be enabled) and also IP protected.

Will the collected data be shared?

The collected personal data (in their pseudonymised form) may be disclosed: (1) to all/relevant partners of the Consortium, according to a need-to know principle, 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).

Who will be responsible for all of the data when this study is over?

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 [i.e., August 2030], 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?

Social media users' information collected in ReSilence 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?

Your data will be used for identification of viewer sentiment towards different aspects of videos. Data collected from you will only be used to test the capabilities of the ReSilience tools with no automated support decision, thus you will not suffer any relevant consequences.

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, 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.
- *Right to object:* you may request us to stop processing their 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 these rights may be restricted in the light of the GDPR (e.g. art. 89 par. 2) and the applicable national 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