



## **D1.3 Project's Data Management Plan, edition 1**



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Brief abstract	Data Management Plan (DMP) details the project's methods for handling data to ensure transparency, accessibility, and adherence to ethical standards. Utilising both existing data from governmental and public databases, previous studies, satellite imagery, and newly generated data to provide comprehensive insights into rural development challenges. Key components include the application of FAIR principles, data security, and GDPR compliance. Thorough documentation will support data validation, reuse, and long-term preservation, enhancing the project's impact and supporting broader research and policy-making in rural development.

## Disclaimer

Funded by the European Union. Views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union or European Research Executive Agency (REA). Neither the European Union nor the granting authority can be held responsible for them.

## Document history

Version	Date	Main measures/changes	Responsible
0.1	17/05/2024	Initial draft	Plan4all
0.2	22/05/2024	Initial version of Summary and Introduction	Plan4all
0.3	11/06/2024	Input from partners on data used and generated, conclusions	Plan4all
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## Abbreviations

Acronym	Title
AI	Artificial Intelligence
CC-BY	Creative Commons license - Attribution required
CC0	Creative Commons license - No Rights Reserved
CVUT	Czech Technical University
DMP	Data Management Plan
DOI	Digital Object Identifier
EU	European Union
FAIR principle	Findable, Accessible, Interoperable, and Reusable
GDPR	General Data Protection Regulation
GIS	Geographical Information Systems
GPL	General Public License
ISO	International Organization for Standardization
JSON	JavaScript Object Notation
MIT	Massachusetts Institute of Technology
OGC	Open Geospatial Consortium
XML	Extensible Markup Language



## Executive Summary

The PoliRuralPlus project is dedicated to fostering sustainable, balanced, and inclusive development of rural-urban communities through advanced data management strategies. This Data Management Plan (DMP) outlines the project's approach to handling data, ensuring transparency, accessibility, and adherence to ethical standards. By leveraging both existing data from governmental and public databases, previous studies, and satellite imagery, alongside new data generated through surveys and participatory sessions, the project aims to offer comprehensive insights into rural development challenges.

Key components of this DMP include the application of FAIR principles—making data Findable, Accessible, Interoperable, and Reusable. The project prioritises data security and compliance with GDPR, ensuring sensitive information is protected. Data generated and reused will be documented thoroughly, facilitating validation, reuse, and long-term preservation. This strategic approach not only enhances the project's impact but also promotes broader research and policy-making advancements in rural development.



## 1. Introduction

While the landscape of rural development is changing, the PoliRuralPlus project aims to use a variety of data sources to guide and shape sustainable policies and practices. This Data Management Plan provides an overview of the types and sources of data utilised and anticipated to be generated throughout the duration of the project. By detailing our data management strategies, we ensure transparency, facilitate access, and promote the reuse of data within the limits of ethical guidelines and privacy laws.

Our project leverages both existing data and new data to be generated. Existing data sources include governmental and public databases, previous rural development studies, and satellite imagery, which provide a foundational understanding of the current state of rural regions. At the same time, new data generated through surveys, interviews, and participatory planning sessions will offer fresh insights into the evolving needs and challenges faced by rural communities.

This deliverable - in edition 1 - outlines the specific data types, their sources, and how they will be collected, processed, and stored, ensuring alignment with the FAIR principles. Additionally, it addresses the measures taken to protect sensitive information and ensure compliance with GDPR and other relevant data protection frameworks. Subsequent versions will follow with further improvements in M18 and M30.

The primary purpose of this DMP is to describe how FAIR data management principles will be maintained during and after the project's end. Its structure as a Deliverable follows the Guidelines on FAIR Data Management in Horizon Europe (Version 1.1 - 1 April 2022) provided by the European Commission.



## 2. Data Summary

In the evolving landscape of rural development, the PoliRuralPlus project aims to harness a diverse array of data sources to inform and shape sustainable policies and practices. This section of the Data Management Plan provides an overview of the types and sources of data utilised and anticipated to be generated throughout the duration of the project. By detailing our data management strategies, we ensure transparency, facilitate access, and promote the reuse of the data within the confines of ethical guidelines and privacy laws.

Our project leverages both existing data (Table 2) and new data to be generated (Table 1). Existing data sources include governmental databases, previous rural development studies, and satellite imagery, which provide a foundational understanding of the current state of rural regions. Concurrently, new data generated through surveys, interviews, and participatory planning sessions will offer fresh insights into the evolving needs and challenges faced by rural communities.

This section outlines the specific data types, their sources, how they will be collected, processed, and stored, ensuring alignment with the FAIR (Findable, Accessible, Interoperable, and Reusable) principles. Additionally, it will address the measures taken to protect sensitive information and ensure compliance with GDPR and other relevant data protection frameworks.

WP	Task	Data(set) / output title	Abstract	Data controller / data processor	Generated via/used method	Language/s of data	Type of data	Size	Sensitive/personal data	Expected delivery	Storage	Users (if known)	Use Limitation
WP4	4.1	Optimal land-use		AV	Spatial + LLM	Int'l English							no
WP4	4.2	Carbon footprint		AV	Spatial + analysis	Int'l English							no
WP5	5.2	Regional Attractiveness		DIT	data processing, interviews, survey	Int'l English							no
WP5	5.2	Mallusjoki pilot (FI): customer survey	The data on customers' reasons to participate rural events in Mallusjoki	MYA	Online questionnaire and semi-structured interviews	Finnish	Qualitative and semi-quantitative data	100+ responses	No	8/2024	Stored at secured cloud storage.	n/a	no
WP5	5.2	Mallusjoki pilot (FI): community members' survey	The data on Mallusjoki region inhabitants' reasons to participate in planning and arrangements of rural events in Mallusjoki. Why do they voluntarily join in community actions?	MYA	Online questionnaire and semi-structured interviews	Finnish	Qualitative and semi-quantitative data	50+ responses	No	8/2024	Stored at secured cloud storage.	n/a	no
WP5	5.2	Consolidated structuring of municipal development programmes		VPR	policy review	Latvian	Qualitative and semi-quantitative data		No				
WP5	5.2	Data gathering on development initiatives in private, non-governmental sector		VPR	Interviews, surveys, data processing	Latvian	Qualitative and semi-quantitative data		No				
WP6	6.1	Database of stakeholders	An accurately maintained, GDPR-compliant record of all stakeholders involved. This is a mandatory deliverable of third parties involved in the project execution via the Outreach open call.	Third parties themselves	Collected by third parties through their network or organised events.	English	tabular data based on template from WP2	50+ stakeholders	Yes, details such as names of contact persons and	12/2024	Secure repositories of third parties. Anonymised version on the	n/a	yes, sensitive data, project partners only



## D1.3 Project's Data Management Plan, edition 1

WP	Task	Data(set) / output title	Abstract	Data controller / data processor	Generated via/used method	Language/s of data	Type of data	Size	Sensitive/personal data	Expected delivery	Storage	Users (if known)	Use Limitation
									their emails will be included.		secure CVUT shared project space.		
WP6	5.1	Open call deliverables	Third parties involved in the project will generate a set of mandatory and other deliverables. These outputs are not yet defined and will be added in the next update of the DMP.	Third parties themselves	TBD	English	TBD	TBD	No	2025/2026	TBD	TBD	no
WP2	All	PoliRuralPlus Stakeholders Database	An accurately maintained, GDPR-compliant record of all stakeholders involved.	Each of pilot's lead partner		English	tabular data	200+ stakeholders	Yes, details such as names of contact persons and their emails will be included.	05/2024, updated throughout the project duration	On secured data repositories of each partner. Anonymised version will be aggregated at the CVUT shared project space.	n/a	yes, sensitive data, project partners only
WP2	All	PoliRuralPlus References Database	CSV file of URLs to public documented reports and studies relevant to PoliRuralPlus	MAC & D2.3 partners	Analysis of published reports and studies relevant to PoliRuralPlus and their cited references.	English	tabular data	2000 URLs	None, as all are publically available	06/2024, updated throughout the project duration	On the secure CVUT shared project space	Knowledge Space for PoliRuralPlus Regional Analysis Dashboard	No, as all are publically available URLs

Table 1 Data and other outputs generated (research data and other outputs such as maps, databases, methodologies, models)

WPs	Tasks	Data(set) title	Abstract	Responsible partner	Language/s of data	Type of data	Size	Restrictions, protection
WP4	4.1	Digital elevation model, digital surface model		AV	Numerical data			Open
WP4	4.1	Frost API meteorological data		AV	English			Open
WP4	4.1	Smart Points of Interest	Global dataset of harmonised points of interest	AV	Int'l English, local languages	GIS data		Open
WP4	4.1	Open Landuse Map	pan European database of land use, land cover and other themes	AV	Int'l English, local languages	GIS data		Open
WP4	4.1	Land cover map AR5		AV	Norwegian	Detailed land cover		Open
WP4	4.1	Place name gazetteer		AV	Norwegian	Geographical names		Open
WP4.	4.1	Cultural heritage assets		AV	Norwegian			Open
WP4	4.1	Genesis Data		DIT	Int'l English, German	Quantitative Data		Open
WP5	5.2	Bayernatlas		DIT	German	GIS Data		Open
WP3	3.1	Regional Innovation Scoreboard (RIS)		DIT	Int'l English	Quantitative Data, Index Scores		Open
WP3	3.1	EU Regional Competitiveness Index 2.0		DIT	Int'l English	Quantitative Data, Index Scores		Open
WP3	3.1	Indikatoren und Karten zur Raum- und Stadtentwicklung (INKAR)		DIT	German	Indicators		Open
WP3	3.1	Eurostat	statistical data	DIT	Int'l English, German, French	Quantitative Data		Open
WP2, WP5	2.2, 2.3., 5.1., 5.2., 5.3.	Central Statistical Bureau of Latvia	The CSB is a direct administration body subordinated to the Ministry of Economics, and acting as the main performer and coordinator of the official statistical work in the country.	VPR	Latvian	Quantitative Data		Open
WP3	3.1	OpenStreetMap	Selected data from the open database	P4A	English	Geographic data		Open

WPs	Tasks	Data(set) title	Abstract	Responsible partner	Language/s of data	Type of data	Size	Restrictions, protection
WP3	3.1	Eurostat Database	Selected data from the open database	P4A	Int'l English, local languages	Statistical data		Open
WP3	3.1	International Labour Organization data	Selected data from the open database	P4A	English	Statistical data		Open
WP3	3.1	World Bank data	Selected data from the open database	P4A	English	Statistical data		Open
WP4	4.1, 4.2, 4.3	MAATool User Data	Name, email and password for each user	SINNO	Local languages	Qualitative data	400 KB	Sensitive

Table 2 Existing data intended to be reused, adapted, etc.



### 3. PoliRuralPlus FAIR Data Approach

In the digital age, the value of data lies not only in its collection but also in its effective management and utilisation. The PoliRuralPlus project is committed to adhering to the FAIR data principles, ensuring that all data generated and used throughout the project are Findable, Accessible, Interoperable, and Reusable. This section details our strategic approach to embody these principles, facilitating enhanced data sharing and collaboration both within our project and with the wider research and policy-making communities.

**Findability** entails making the data easily locatable by both humans and machines via well-maintained data catalogues and rich metadata that include clear, descriptive titles and keywords. **Accessibility** means ensuring that once data is found, it can be accessed by users under well-defined conditions, using standard communication protocols and with an awareness of data sensitivity. **Interoperability** involves structuring the data in formats and using vocabularies that are broadly applicable, thus enabling integration with other datasets and tools. Finally, **Reusability** is enhanced by detailed data documentation that supports replication and enables others to use and repurpose the data in different contexts.

In this section, we will explore the methodologies, tools, and standards adopted by PoliRuralPlus to meet these objectives, providing practical examples of how these principles are applied to our data sets. By embedding the FAIR principles into our data management strategy, we aim to maximise the impact and utility of our data, paving the way for innovative solutions to rural development challenges.

*The primary tool to be used for sharing open research data generated by PoliRuralPlus is Zenodo<sup>1</sup>. For this reason, a Zenodo PoliRuralPlus community was set up (Figure 1). The community including its members and uploaded data can be accessed at*

<https://zenodo.org/communities/poliruralplus>

<sup>1</sup> Zenodo (<https://zenodo.org/>) is an open-access repository developed under the European OpenAIRE program and operated by CERN. It enables researchers to share and preserve any research outputs in any size, format, and from all fields of science. Zenodo allows users to assign a Digital Object Identifier (DOI) to their data to ensure each dataset is citable and trackable.

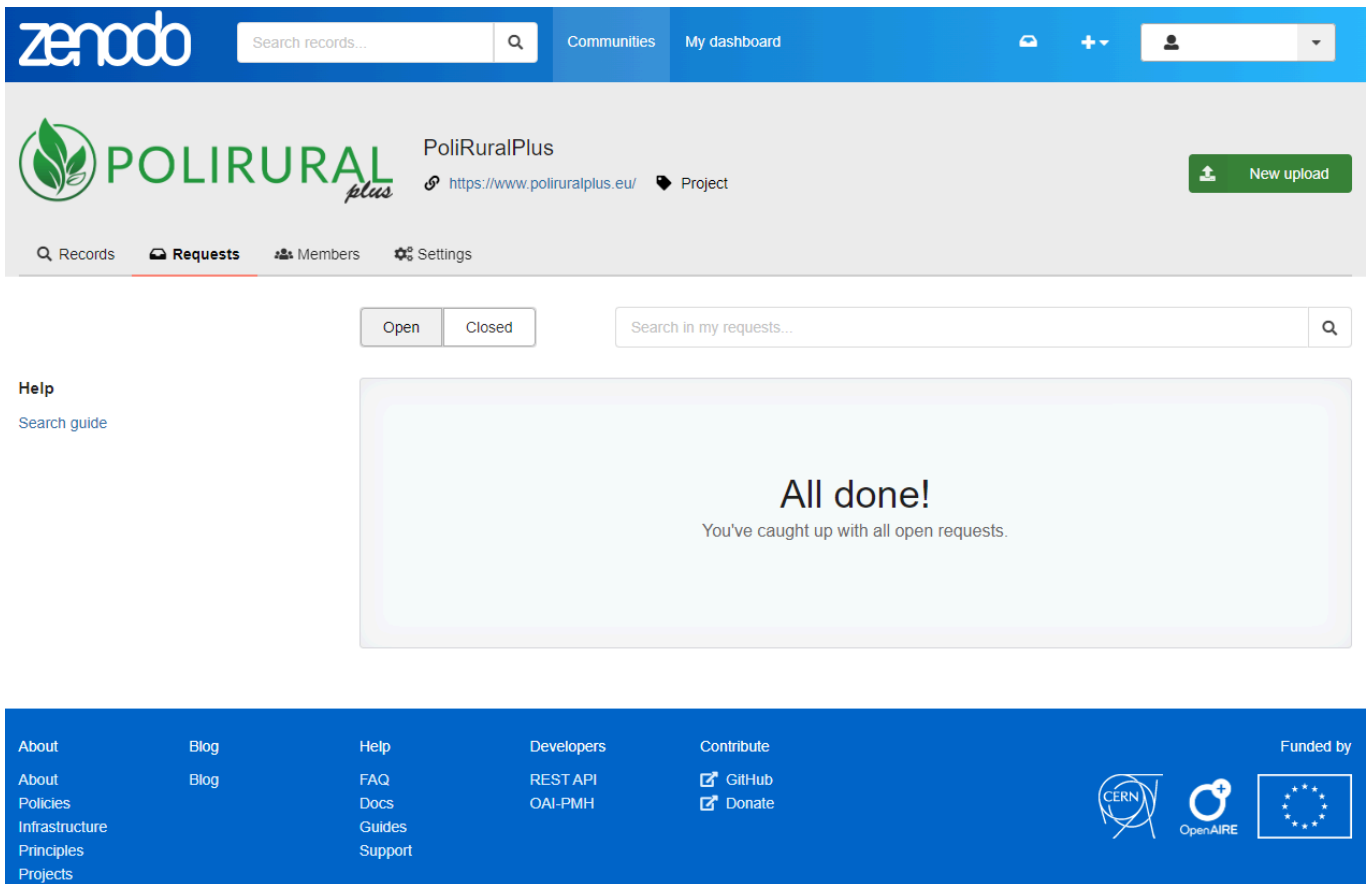


Figure 1 The PoliRuralPlus community at Zenodo.

Project partners are encouraged to view the Zenodo tutorial - How to use and upload your research available at <https://www.youtube.com/watch?v=BPVSErzNtME>.

### 3.1 Making data findable, including provisions for metadata

**Persistent identifiers:** All generated research data within the PoliRuralPlus project shared on Zenodo will be assigned a Digital Object Identifier (DOI), ensuring each dataset has a unique and permanent link. This identifier enhances the discoverability and provides a reliable mechanism for data citation and linkage across platforms.

#### Rich metadata creation and standards:

- **Zenodo Uploads:** For datasets uploaded to Zenodo, metadata will be generated automatically according to Zenodo's metadata standards, which cover essential fields such as title, author, keywords, and descriptions. This structured metadata ensures consistency and aids in the effective indexing and retrieval of data.
- **PoliRuralPlus Hub and Micka Catalogue:** For geospatial and other data not suitable for Zenodo, metadata will be catalogued in the PoliRuralPlus Hub using Micka. Micka, as a specialised metadata catalogue for geospatial data, adheres to INSPIRE standards and supports custom metadata schemas tailored to the specific requirements of our project.



This dual approach ensures that all data types are accommodated with appropriate metadata standards.

**Search keywords:** To maximise discoverability, we will incorporate relevant search keywords into the metadata for both platforms. These keywords will be carefully chosen to reflect the core themes and elements of the datasets, facilitating effective searches and increasing visibility across multiple search engines and databases.

**Harvesting and indexing of metadata:** Metadata from both Zenodo and the Micka catalogue will be structured to allow for harvesting and indexing by major data aggregators and search engines. This strategy not only enhances the visibility of our datasets but also ensures that they are accessible through commonly used research data portals and geographical information systems (GIS).

### 3.2 Making data openly accessible

For the publication of GIS data, the project utilises the **PoliRuralPlus Hub**, equipped with the Micka metadata catalogue. This platform is specifically chosen for its robust capabilities in handling geospatial data, enabling detailed metadata management and adherence to INSPIRE, ISO and other standards, which are critical for ensuring interoperability and compliance with EU regulations on spatial data. The Hub not only facilitates the structured storage and easy retrieval of complex GIS datasets but also supports special features that are essential for spatial data analysis and visualisation.

Conversely, **Zenodo** is employed for the publication of other types of research data generated by the project. This includes textual data, research articles, datasets from non-GIS methodologies, and any other research outputs that do not require the specific functionalities of a GIS-oriented system. Zenodo's strength lies in its ability to provide a stable, DOI-equipped, open-access repository that ensures long-term preservation and easy access to the data, thus enhancing the visibility and citation of the research outputs.

#### Repository:

For the PoliRuralPlus project, data will be deposited in trusted repositories such as Zenodo and the PoliRuralPlus Knowledge Hub. These repositories have been selected for their reliability and alignment with our data management needs. Zenodo ensures that each dataset is assigned a persistent identifier, such as a DOI, which resolves to a digital object, facilitating easy access and citation.

#### Data:

The PoliRuralPlus project is committed to making data as openly available as possible. However, specific datasets may be subject to restricted access conditions due to legal, contractual, or legitimate interests of project beneficiaries. These exceptions will be clearly documented, outlining the reasons for any restrictions and separating them into legal or intentional categories. If there are intellectual property concerns or publication intentions, an appropriate embargo period will be applied, which will be specified and justified, keeping in mind the goal of making research data available at the earliest practical opportunity. Access to data will be provided through free and standardised protocols. In cases of restricted access, mechanisms will be in place to ascertain the identity of individuals accessing the data, and if necessary, a data access committee may be established to evaluate and approve requests, especially for sensitive or personal data.

Personal data collected, including names, emails, and other contact details of stakeholders (D2.1), will be processed lawfully, fairly, and transparently, with explicit consent obtained from data subjects where necessary.



Each project partner responsible for data collection will act as the data controller, ensuring compliance with GDPR principles such as data minimization, purpose limitation, and storage limitation. Data subjects will be informed of their rights, including access, rectification, and erasure of their data, and mechanisms will be established to facilitate these rights. Additionally, any third parties involved in data collection through outreach activities will adhere to the same GDPR standards, with all data being securely stored on the CVUT shared project space.

#### Metadata:

Metadata associated with all datasets will be made openly available and will be licensed under the public domain dedication CC0, unless specific exceptions apply, which will be clearly justified. This metadata will contain detailed information necessary to access the underlying data. The PoliRuralPlus project ensures that metadata will remain available and findable post the project's conclusion.

### **3.3 Making data interoperable**

To achieve high levels of interoperability, the PoliRuralPlus project will adhere to internationally recognised data and metadata standards, formats, and vocabularies that are endorsed by the research community. For general research data JSON or XML for data formatting. For geospatial data, we will follow the OGC (Open Geospatial Consortium) standards and the INSPIRE directive, which provide frameworks for sharing geographic information and services. These standards ensure that our data is compatible with global systems and can be easily integrated with other datasets and tools.

When uploaded to the repository research data and outputs should only be stored in a preferred file format that conforms to the international standards (based on the KNAW-DANS Preferred Formats<sup>2</sup>, November 2015) to ensure future compatibility. These are some types of formats for long-term preservation of research data that we recommend being used in PoliRuralPlus:

- Document (.txt; .pdf; .doc; .docx; .odt)
- Spreadsheet (.csv; xls; .xlsx; .ods)
- GIS vector data (ESRI Shapefile, GeoParquet, GeoJSON, PostGIS)
- GIS raster data (.geotiff; .img, NetCDF)
- Database (.csv; .sql; .mdb; .accdb)
- Picture (.jpg; .tif; .png)
- Audio (.wav; mp3)
- Video (.avi; .mp4; .mov)

### **3.4 Increase data re-use (through clarifying licences)**

All data produced by the PoliRuralPlus project will be made freely available in the public domain whenever possible, using standard reuse licenses such as Creative Commons licenses (e.g., CC-BY or CC0), in accordance with the obligations set out in the Grant Agreement. This approach promotes the widest re-use possible by minimising legal barriers, thereby encouraging innovation and further research.

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<sup>2</sup> <https://dans.knaw.nl/en/file-formats/>



Thorough documentation of the provenance of the data will be maintained, adhering to appropriate standards. This includes tracking the origin of the data, any changes made, and the methodologies applied throughout the data lifecycle. Such documentation is crucial for validating the data's integrity and authenticity.





## 4. Other Research Outputs

In the PoliRuralPlus project, we will rigorously apply the FAIR principles across all categories of outputs, including software, methodologies, AI models, and other results.

We will utilise robust platforms such as GitHub or GitLab for the collaborative development, version control, and hosting of our software tools. An appropriate open-source license (e.g., MIT, GPL, Apache) to clarify how others can use and modify the code will be chosen on a case by case basis.

In order to make our research results and prototypes well accessible by the research community, we will consider using platforms like paperswithcode.com and others.



## 5. Allocation of Resources

In the PoliRuralPlus project, we have chosen Zenodo as our primary data repository, which is free of charge to authors to upload their data. Each partner of the PoliRuralPlus project generating any research data and other outputs will allocate appropriate resources for data management activities, ensuring sufficient resources are dedicated to achieving FAIR compliance.



## 6. Data Security

Data security is of high priority in PoliRuralPlus. There are two levels of internal data storage options:

1. **Partner level** - partners store research data on their institutional servers, also using services such as Google Drive, and Teams/OneDrive. When collecting and storing sensitive data on partners' infrastructure, it is essential to highlight that ensuring the physical security of this data lies solely with our partners. They are expected to safeguard the data through modern security measures, including physical access controls, protection against unauthorised access, and other relevant data protection mechanisms. Partners are also responsible for notifying the coordinator of any security incidents in compliance with applicable laws and internal guidelines. To manage and store data effectively, regular meetings with representatives from all partners are proposed to ensure continuous data updates and reviews of security measures.
2. **Project level** - Cloud storage OneDrive provided by CVUT is used as a data/file sharing repository (more details can be found in D1.2 – Project road map, handbook and action plan for project management and Ethics appraisal framework and handbook for the management of ethics).

In order to maximise data security, the following recommendations are in place:

- Data will be stored and processed on each partner's own repositories.
- To share data, partners will use either OneDrive provided by CVUT or the PoliRuralPlus portal with password protection.
- Partners are encouraged to have rigorous daily backup procedures in place.
- No personal or identifying data will be stored with response data. Such personal/identifying data will be kept in a separate, password protected location with access only for authorised members of the project team. It will not be shared between partners. Management will comply with GDPR.



## 7. Ethics

**Ethics and legal considerations:** Throughout the PoliRuralPlus project, we will closely monitor and address any ethical and legal issues related to data sharing. This includes complying with GDPR for the handling of personal data and adhering to ethical guidelines specified in the deliverable D1.2 – Project road map, handbook and action plan for project management and Ethics appraisal framework and handbook for the management of ethics. Potential ethical issues, such as privacy concerns and the risk of re-identification, will be thoroughly assessed and managed.

**Informed consent:** Informed consent will be a cornerstone of our approach to handling personal data. All questionnaires and data collection methods involving personal data will include provisions for informed consent, ensuring that participants are fully aware of how their data will be used, shared, and preserved. The consent forms will explicitly cover the aspects of data sharing and long-term preservation, providing clear options for participants to agree or object. A template for a consent form is in Annex 1.

This applies also to third parties that will be involved in the project execution via open calls and cascade funding.



## 8. Conclusions

The DMP outlined in this deliverable is designed to evolve, with subsequent versions incorporating improvements based on ongoing project developments and feedback. This iterative approach ensures that the data management practices remain aligned with emerging standards and best practices, thereby enhancing the project's overall impact and contribution to sustainable rural development.

By embedding robust data management practices into the project's framework, PoliRuralPlus is well-positioned to generate valuable insights and foster innovative solutions for rural-urban development challenges, ultimately contributing to a more sustainable and inclusive future for these communities.

The diligent execution of this Data Management Plan will not only benefit the current project but also set a precedent for future initiatives, promoting a culture of data excellence and ethical research practices in the realm of rural development.

## REFERENCES

1. Horizon Europe, EU Grants, AGA - Annotated Grant Agreement, EU Funding Programmes 2021-2027, version 1.0, 01.05.2024, [https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/aga\\_en.pdf](https://ec.europa.eu/info/funding-tenders/opportunities/docs/2021-2027/common/guidance/aga_en.pdf)
2. PoliRuralPlus, Grant Agreement
3. D1.2 – Project road map, handbook and action plan for project management and Ethics appraisal framework and handbook for the management of ethics



## Annex 1 Template for a Consent Form for Data Collection

### Consent Form for Data Collection

[Your Organization's Name]

[Your Organization's Address]

[Your Organization's Contact Information]

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### Purpose of Data Collection

We are collecting your personal data for the following purposes:

- [List specific purposes, e.g., marketing, service improvement, research]

### Data Controller

The data controller responsible for your personal data is:

- **Name:** [Your Organization's Name]
- **Contact:** [Email Address, Phone Number]

### Data We Collect

We will collect the following personal data:

- [List types of data, e.g., name, email address, phone number, etc.]

### Use of Data

Your personal data will be used for the purposes stated above and may be shared with:

- [List third parties if applicable, e.g., marketing partners, service providers]

### Retention Period

Your personal data will be retained for:

- [Specify duration, e.g., until the end of the service, for one year, etc.]

### Your Rights

You have the right to:

- Access your personal data
- Rectify any inaccuracies in your personal data
- Erase your personal data
- Restrict or object to the processing of your personal data



- Data portability
- Withdraw consent at any time

To exercise these rights, please contact us at [Your Contact Information].

### Consent

By signing this form, you consent to the collection and use of your personal data as described above.

- **Name:** \_\_\_\_\_
  - **Signature:** \_\_\_\_\_
  - **Date:** \_\_\_\_\_
- 

### Withdrawal of Consent

You may withdraw your consent at any time by contacting us at [Your Contact Information]. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

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### Contact Information

If you have any questions or concerns about this consent form or our data processing practices, please contact:

- **Data Protection Officer (if applicable):** [Name]
  - **Email:** [Email Address]
  - **Phone:** [Phone Number]
  - **Address:** [Your Organization's Address]
- 

### Electronic Consent

If you prefer to provide your consent electronically, please tick the box below:

☐ I consent to the collection and use of my personal data as described above.