

INFORMATION SHEET

WORKINGAGE (WA) PROJECT SMART WORKING ENVIRONMENTS FOR ALL AGES

SECTION I – DESCRIPTION OF WORKINGAGE PROJECT RESEARCH

Title of Research: WA STUDIES

Investigator: The WA consortium composed by

- Instituto Tecnológico de Castilla y Leon (ITCL – Spain),
- Exus Software Monoprosopi Etairia Periorismenis Evthinis (EXUS - Greece),
- The Chancellor Masters and Scholars of the University of Cambridge (UCAM - UK),
- Politecnico di Milano (POLIMI – Italy),
- Green Communications Sas (GC – France),
- BrainSigns S.r.l. (BS – Italy),
- Rheinisch-Westfaelische Technische Hochschule Aachen (RWTH – Germany),
- Telespazio France Sas (TPZ - France),
- Audeering GmbH (AUD – Germany),
- European Emergency Number Association Asbl (EENA - Belgium),
- Fundacion Intrass (INTRASS - Spain),
- Telematic Medical Applications Emporia Kai Anaptixi Proionton Tiliatrikis Monoprosopiki Etairia Periorismenis Eythinis (TMA - Greece)

Before agreeing to participate in this research study, it is important that you read the following explanation. This statement describes the purpose, procedures, benefits, risks, discomforts, and precautions of the program. It also describes the alternative procedures available to you, as well as your right to withdraw from the study at any time. No guarantees or assurances can be made as to the results of the study.

EXPLANATION OF THE WA PROJECT

The goal of WorkingAge (*smart working environments for all ages*) (WA) project will be to develop a smart assistive system capable to interact naturally with ageing users. It will bring a “working” solution that will learn user behaviour, physiological data, and preferences by employing biometric and visual sensors. This innovative system will provide older adults assistance in their everyday working routine in the form of reminders, risks avoidance and recommendations. In this way, the WA project will create a product that will empower users and ease their lives by attenuating the impact of ageing in their working environments considering all wellbeing aspects.

EXPLANATION OF PROCEDURES

You are being asked to participate in the tests required within the WA project. This project has been funded by the European Commission under the EU funding programme for research and innovation H2020.

Consent 1: During your participation to this project we will collect, on your workplace, data on biological signals, namely, your heart rate, Galvanic Skin Response (GSR), brain activity via Electroencephalography (EEG), muscle activity, facial expression, eyeblink detection, eye movement, pupil diameter variations. We will also record your voice to perform voice/emotion analyses, and record images of your body posture to perform gesture

recognition. Finally, we will record a loose representation of your location at the workplace employing the proximity of your smartphone to the WiFi access points.

The WorkingAge project also employs an environmental quality sensor, which collects data on the temperature, humidity, and level of carbon dioxide. Such a sensor, however, collects no data related to your person, or that can be used to identify you.

All these signals, except for your location, will be collected by sensors at your work location, **labelled with a fictitious identity (that is an identifier with no relation to your actual identity)**, transferred to one or more dedicated WA servers at your company, which will process them only knowing the fictitious identity, and then the results will be transferred to your smartphone, which will use the said fictitious identity to obtain them from the WA servers.

The results sent to your smartphone will be in the form of high-level information (e.g., your body pose will be inferred from a video recording) and will be encrypted in a form that only your smartphone can decrypt.

The processed data, i.e., the high-level information, bound to the fictitious identity, may be shared among AUD, BS, RWTH, UCAM, INTRAS. This sharing may only take place during the data processing, i.e., when the servers are computing the data. The purpose of this data sharing is to perform cross-checks to detect possible failures in the data collection equipment and analyse the effectiveness of the WAOW tool.

The high-level information will be deleted from everywhere except for your smartphone as soon as the checks for possible failures are done, in accordance with the *minimality of data retention* principle of the GDPR.

The location data will stay on your smartphone and be managed directly by the WA app alone.

The WA app will also collect your feedback on whether it is contributing to improving your work life experience, through questionnaires. The answers to the questionnaires will be analysed by personnel at UCAM, BS, INTRAS and RWTH.

In addition to this data collection done at the workplace in your company, we will collect on the WA smartphone also the following data about your habits outside your workplace and/or at home. An *activity tracking smart* bracelet will be provided to you to measure your sleep duration and sleep quality as well as to register the count of the steps taken in a day and your heart rate. In addition, you will also be provided with a *smart scale* to measure your weight and compute your body mass index.

Two questionnaires, one before the beginning of the participation and one at the end of the participation (from now on: pre- and post-questionnaires) will be collected via the [encuesta.com](https://www.encuesta.com) GDPR compliant online form service (the privacy statement from [encuesta.com](https://www.encuesta.com) is provided as Annex A of this document, and available at <https://www.encuesta.com/privacidad>). These data will be extracted to a private server owned by INTRAS and stored there in clear. Network and physical access control policies to the data will be enforced by INTRAS. The data from these questionnaires will be shared by INTRAS with UCAM and RWTH via encrypted e-mails. UCAM will employ whole-volume encryption techniques on the mass storages where the data are stored, while RWTH will resort to physical and network access control to prevent unauthorized access to the cleartext-stored data.

The WA app collects log files, i.e., text files containing a diary of the interactions of the WA app with the sensors, such as the date and time at which the sensors are active or turned off. These log files will be sent to UCAM and RWTH, in encrypted form so that only UCAM and RWTH will be able to access them.

You should also answer questionnaires, provided via the WA app, about your health and well-being habits and/or health status. The data from the questionnaires will be collected by the WA app and sent to personnel from UCAM, INTRAS, BS and RWTH, who will be able to analyse your answers and perform statistical analyses on them with data being collected from other sensors. In particular:

- UCAM will perform statistical analyses on the WA app log files, the pre- and post-questionnaires collected by INTRAS, the questionnaires answers provided via the WA App and the readings from UCAM sensors.
- BS will perform statistical analyses on the questionnaires' answers provided via the WA App and the readings from BS sensors
- INTRAS will perform statistical analyses on the pre- and post-questionnaires answers, and the readings from the smart scale and smart bracelet sensors. Moreover, INTRAS will also analyse the answers to the questionnaire collected by the WA app concerning: Nutritional habits and sleep quality and custom questions within the app.
- RWTH will perform statistical analyses on the WA app log files, the pre- and post-questionnaires collected by INTRAS, the questionnaires answers provided via the WA App, and the readings from RWTH sensors.

The WA app will compose a *profile* of you, aggregating the data available and it will store the said profile on the WA smartphone **only**.

For backup purposes an encrypted backup of your data, on a remote storage server offered by the WA project, will be periodically performed. On the WA smartphone, you alone will have the key to decrypt the said backup.

Consent 1 is mandatory: *The data collection illustrated up to now is required for the WA tool to function properly and is thus **required** to participate to the WA project.*

Consent 2: In addition to the data collection required to participate to the WA project, you may consent to additional data collections.

Specifically, you may consent to the collection of noise-level and audio data at your home, outside the working hours. A noise recording sensor will be provided to you and will require you to provide a wired internet connection to it. If you need, the WA project will provide you with ethernet-over-powerline adapters which will ease its installation.

Together with noise-level and audio data, also the environmental sensor collecting temperature, humidity and level of carbon dioxide will be used.

In case teleworking applies to your working scenario, you may consent to the use of both a headset and an Internet connected camera also outside your working hours at your home. You may switch on these sensors, outside your working hours (e.g., the headset and camera), at your will.

Consent 2 is optional: *Not providing this consent will not influence in any way your participation to the WA project.*

Consent 3: At your choice, you may allow the WA consortium to retain the raw data collected on the WA dedicated server at your company (except for the raw audio data collected during work), even after the processing that condenses the information that are subsequently sent to your smartphone. If you choose to do so, the said data will be employed only for research purposes, and they will not be employed for any kind of commercial purposes.

Only the use, not the disclosure of images, video and audio recordings will be allowed in this case, and all the raw data will not be directly linkable to you: your name will be

substituted with a random fictitious identity, while other directly identifiable information will be removed altogether.

These pseudo-anonymous data may only be published in the form of aggregated statistics, combining them with the ones of other WA project participants.

Consent 3 is optional: *Not providing this consent will not influence in any way your participation to the WA project.*

Consent 4: As a last option, you may also consent, if you are willing to do so, to donate your data (except for raw audio data collected during work) for scientific, non-commercial research, including their release, under fictitious identity, for use by other research entities which do not belong to the WA consortium.

The publication of video recordings, in case you provide your consent, will also be subject to the approval for publication by your employer.

This includes the possibility to publish raw data in scientific papers (bound to a fictitious identity) and/or make them available in public research repositories (bound to a fictitious identity).

Consent 4 is optional: *Not providing this consent will not influence in any way your participation to the WA project.*

The WA tool is also experimenting with an emergency detection and calling service. However, this service will not be operational during the tests you are going to participate. In case an emergency is detected, the service will automatically generate a message, containing your current position at work and the sensor data that triggered the emergency service, that will be sent to one of the WA project servers for functionality monitoring purposes, but no real emergency service will be warned. In case you need to contact emergency services, please contact them in the way you would do, as if you did not use the WA tool. WA will not contact emergency services for you.

Testing this service in real conditions will help us improve the system for an operational service in the future.

Full details on which data are collected and through which sensors are provided in the publicly available “WA intervention protocol” document which can be provided to you upon request.

METHODOLOGY

The base functions of the WA tool will require the deployment of measurement sensors on the available furniture at your workplace, save for the smart bracelets and the EEG sensors, which need to be worn. Some sensors (e.g., camera, microphone) will collect data on you starting from the moment where your smartphone signals to the WA equipment's that your fictitious identity is operating at a given workplace or outside-your workplace (at home) when you give your permission to and terminate when your activities stop, or you decide to terminate the data collection. Some other sensors (e.g., bracelet) will continuously collect the corresponding data. The work-related risks while performing the data collection will be the same as the risk in normal life.

To prevent the possibility that someone could obtain your data and use it in a way that harms you legally, financially, or emotionally, we have taken several steps to protect your data as described in the subsequent Section II **“INFORMATION ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE EU REGULATION 679/2016 (GDPR)”**.

- Bear in mind that you are responsible for taking steps to protect your privacy. Do not post or disclose your participation to the WA project on any public forum including websites, Facebook, newspapers, radio, and television. Protect your role in the study the same way that you protect other personal and private information. If you do not keep confidential your role in the study, there is a risk that some of the data collected during the study may be used against your will.
- The data of other co-workers or acquaintances who have not signed a consent form that are accidentally recorded will be deleted as soon as data processing identifies them as non-consenting users. All attempts will be made to not collect identifying information on such subjects.

If you decide to participate, you will be asked to do the following things:

- Undergo a consent process which includes reviewing and signing a consent form.
- Allow us to install the data collection equipment.
- Behave as you normally would while you are in the study.
- You will be asked to answer some questionnaires about your experience during the tests.

HOW LONG WILL YOU BE INVOLVED?

Your participation to the WA project will be split in two separate time intervals.

A first test phase will be performed to ensure the full functionality and reliability of both the WA tool and the sensing/processing equipment and assess the physical acceptability of the setup. This test phase will end approximately in **two months**.

The second test phase is the one where the true effectiveness of the WA tool will be assessed. This test phase will span approximately **eight months**, during which the WA tool will be fully functional, and providing you feedback and advices on how to improve your work life.

WHAT HAPPENS WHEN THE STUDY IS OVER?

After the conclusion of the second test phase, you will be required to return all the sensors except for the smartphone, the activity tracking smart bracelet, and the digital scale, which can be kept by you as a reward at no cost if **you participated for the full duration of test phase**.

In case you are willing to accept the monitoring by an extended set of devices out of your working place/time, the equipment provided by the WA consortium will include additionally a headset, an Internet connected camera (IP) and, if provided, a power-over-ethernet adapter kit that you will be allowed to keep.

PROCEDURES RISKS

All data collection equipment is mounted such that, to the greatest extent possible, it does not pose a hazard or problem for you in normal life. None of the data collection equipment should get in the way of your normal field of view.

Misbehaviours related to the use of the equipment provided by the WA consortium may result in your removal from the study and reporting of the behaviour to the appropriate authorities.

WITHDRAWAL WITHOUT PREJUDICE

Participation in this study is voluntary; refusal to participate will involve no penalty. You are free to withdraw your consent and discontinue your participation in this project at any time. In case you withdraw your consent to participate, you will be asked to return all the sensors and devices which have been given to you, including the ones that would have been kept by you as a reward. You may withdraw your consent and participation contacting Fabio BABILONI, privacy@brainsigns.com, and pointing out to him your will to withdraw your consent. Detailed indications are reported in this document, in Section II, Subsection XI - Contact Point.

INCIDENTAL FINDINGS

If, through the data collection and elaboration in the WA project, a potentially medically relevant condition is detected in you, and such condition may require medical follow-up, you will be contacted confidentially by project partners with the suggestion to contact a physician. If required by such interventions, you may withdraw without prejudice from the research.

COSTS AND/OR PAYMENTS TO SUBJECT FOR PARTICIPATION IN RESEARCH

There will be no costs for participating in the research. In addition, you will be able to keep the WA smartphone, activity tracking smart bracelet and digital scale after the project, at no cost. If you consent to the additional monitoring outside working hours you will also be allowed to keep the headset and the IP camera, and, if provided, the power-over-ethernet adapter kit.

ALTERNATIVE PROCEDURES

If you choose not to participate, no alternative procedure is necessary.

Questions concerning the research project can be addressed to the WA Coordinator: Marteyn VAN GASTEREN at ITCL, marteyn.vangasteren@itcl.es.

Questions regarding rights as a person in this research project should be directed to Gerardo Pelosi at POLIMI, email: gerardo.pelosi@polimi.it.

Any other questions, e.g., concerning the use of the WA tool, or how to wear the WA sensors, can be directed to the Company Manager in contact with the WA researchers:

(Name SURNAME) _____ at _____, email: _____

SECTION II - INFORMATION ON THE PROCESSING OF PERSONAL DATA IN ACCORDANCE WITH THE EU REGULATION 679/2016 (GDPR)

This information is issued pursuant to art. 13 of the EU Regulation 2016/679 of 27 April 2016 (GDPR) and of the respective national laws on which the treatment relating to the protection of natural persons will be carried out with regard to the processing of personal data and in compliance with the legislation on the processing of personal data, as well as the free circulation of such data, within the research project "WorkingAge".

I –Joint Data Controllers

WORKINGAGE Project Coordinator: Instituto Tecnológico de Castilla y Leon (ITCL)-Calle López Bravo 70, Burgos 09001, Spain. ITCL Point of contact for the management of personal data:

Marteyn VAN GASTEREN (marteyn.vangasteren@itcl.es)

Partner	Address	Point of contact for the management of personal data
Exus Software Monoprosopi Etairia Periorismenis Evthinis (EXUS - Greece)	73-75 Mesogion Avenue, Athens 11526, Greece.	Ms Zoi Christogerou zochr@exus.co.uk
The Chancellor Masters and Scholars of the University of Cambridge (UCAM - UK)	Trinity Lane the Old Schools, Cambridge, Cb2 1tn, United Kingdom	dpo@admin.cam.ac.uk
Politecnico di Milano (POLIMI – Italy)	Piazza Leonardo Da Vinci 32, Milano 20133, Italy	privacy@polimi.it (e-mail). +39 02 2399 9378 (phone)
Green Communications Sas (GC – France)	6 rue Emile Dubois, Paris 75014, France	contact@green-communications.fr (e-mail) with [Privacy] in the email's subject
Brainsigns Srl (BS – Italy)	Via Sesto Celere 7c, Roma 00152, Italy	privacy@brainsigns.com (email)
Rheinisch-Westfaelische Technische Hochschule Aachen (RWTH – Germany)	Templergraben 55, Aachen 52062, Germany	dsb@rwth-aachen.de
Telespazio France Sas (TPZ - France)	26 Avenue Jean Francois Champollion, Toulouse 31023, France	dpo.fr@telespazio.com
Audeering Gmbh (AUD – Germany)	Landsberger Strasse 46 D, Gilching 82205, Germany	Mr. Stephan Rottmann (s.rottmann@rottmannsit.com)
European Emergency Number Association Asbl (EENA - Belgium)	Avenue De La Toison D'or 79, Bruxelles 1060, Belgium	dpo@eena.org (e-mail) +32 (0)2 534 97 89 (phone)
Fundacion Intrass (INTRAS - Spain)	Calle Martin Santos Romero, Num. 1, Valladolid 47016, Spain	dpo@intrass.es
Telematic Medical Applications Emporia Kai Anaptixi Proionton Tiliatrikis Monoprosopiki Etairia Periorismenis Eythinis (TMA - Greece)	Street Skra N.1-3, Kallithea 17673, Greece	philosot@tma.com.gr

The project coordinator and all partners as joint controllers of the processing according to the provisions of the Data Sharing Agreement signed by the project partners on July 10th, 2021 (whose summary is reported on the site <https://www.workingage.eu>) inform you that the data that are requested and will be provided by you at the time of your participation to the WorkingAge project will be processed as described in Section I, pursuant to the GDPR.

Responsible for Data Protection and contact point.

The Responsible people for Data Protection directly involved in the WorkingAge project as identified in the Grant Agreement (GA) no. 826232 are the DPOs of the coordinating institution and of the partners as specified in the Table above.

Point of contact on behalf of the whole group of partners:

privacy@polimi.it (e-mail) / +39 02 2399 9378 (phone).

Responsible for archiving the signed consent forms and data which users allow to be employed for research purposes.

The completed consent forms will be stored for a period of 10 years in their original paper format, in a secure location at BrainSigns s.r.l., Rome, Italy, separate from the anonymous test data.

At the end of the said period, the forms will be destroyed.

Requests of WA partners to access data for research purposes in case the participant gave her/his explicit consent to do so is managed as detailed in **Section II, Subsection VI - Data retention for future research activities**, of the second part of this document.

Participants may revoke their consent to the processing of personal data as detailed in **Section II, Subsection XI - Contact Point**, of the second part of this document.

II - Purpose of processing, legal basis, data categories and retention period

For the purposes of the application of European and national legislation on the matter (EU Regulation 679/2016, henceforth Regulation), we inform you that your personal data will be used for the following purposes:

Table I			
Purpose of processing of your personal data	Legal basis	Categories of the personal data to be processed	Retention period of personal data
Participation in the WorkingAge project allowing to benefit from the suggestions of the WA tool.	Consent (Article 9, paragraph 2, letter a) of Regulation)	Heart rate, Galvanic Skin Response (GSR), brain activity via EEG, muscle activity, facial expression, blink rate, eye movement, pupil diameter variations, voice to perform voice/emotion analysis, samples of body posture to perform gesture recognition, loose representation of geographical location. Questionnaires concerning your mood, frustration level, difficulty and or pain experienced in deambulation and movement, perceived level of mental workload.	Raw data are accessed by the proper WA partners for the time required to elaborate them to obtain high-level information (minutes to hours). Subsequently, the said high-level information will be available for the duration of the WA project only on the participant's smartphone, unless s/he asks for deletion. A copy of the answers to the questionnaires and of the readings of the sensor being analysed with them will reside on the computer of the partner performing the statistical analyses. Specifically, UCAM, INTRAS, BS, and RWTH, will analyse the readings from their own sensors with the answers to the questionnaires and will keep a copy of all the data for the minimum required amount of time to perform the analysis. Secure deletion will be performed afterwards.
Tailoring of the suggestions of the WA tool to the user profile	Consent (Article 9, paragraph 2, letter a) of Regulation)	Synthetic aggregates (e.g., average emotion over a month), kept on the participant's smartphone and handled by the software program running on the smartphone itself.	At the participant's will. S/he may decide to erase all the data in the WA app whenever s/he is willing to do so. Erasing from the smartphone the decryption key of the data, also renders the remote backup copies unreadable.
Allow more effective suggestions by the WA tool	Consent (Article 9, paragraph 2, letter a) of Regulation)	Optional audio-visual data collected via headset and camera at home outside working hours.	These data can be collected only if the user provides an optional consent and will be employed with the same praxes as the mandatory ones (first row of the table). A copy of the answers to the questionnaires and of the readings of the sensor being analysed with them will reside on the computer of UCAM. UCAM, will analyse the readings from their own sensors with the answers to the questionnaires and will keep a copy of all the data for the minimum required amount of time to perform the analysis. Secure deletion will be performed afterwards.

Provide data to foster scientific research within the WorkingAge project (aggregated publication only)	Consent (Article 9, paragraph 2, letter a) of Regulation)	Either the set of personal data required for the WA tool to be functional (first cell of this column), or both the personal data for the WA tool to be functional, plus the optional ones (third cell of this column)	Ten years after the last request to access the data.
Provide data to foster scientific research (non-aggregated publication allowed)	Consent (Article 9, paragraph 2, letter a) of Regulation)	Either the set of personal data required for the WA tool to be functional (first cell of this column), or both the personal data for the WA tool to be functional, plus the optional ones (third cell of this column)	Ten years after the last request to access the data, plus the data retention resulting from the publication in scientific literature.
Collect your consent to the participation to the project.	Consent (Article 6, paragraph 1, letter a) of Regulation)	Name and surname, date when the consent is given, willingness to be subject to the measurements needed for the WA tool to work, willingness to be subject to the optional measurements, willingness to allow, to a given degree, the use of the collected data for scientific research purposes.	Ten years after the end of the project or less if the participant explicitly asks for data deletion.

III - Nature of the data

Providing the data that are strictly required for the WA tool to work as well as the optional ones is based on a completely voluntary consent, expressed by the test subjects. If the data required for the WA tool to work, as described in Section I – EXPLANATION OF PROCEDURES, are not provided, the subject cannot participate to the WA project, while refusing to provide the optional data, also described in Section I – EXPLANATION OF PROCEDURES, will not prevent a subject from participating to the WA project. Similarly, providing no consent for the use of the data for scientific research purposes will not lead to being excluded from the WA project.

IV - Special categories of data

In the context of the WA project, personal biometric and physiological data need to be processed, to the end of the WA tool working. According to the GDPR directive, *art. 9 par. 1*, such processing is forbidden, unless the exceptions stated in *art. 9, par. 2* of the GDPR itself apply. The use of the data made in the WA project falls under *par. 2, sub-par. (a)*, i.e., *"the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject"*, as the WA project collects spontaneous and wilfully given consent from all the participants.

More specifically, the data falling under the scope of *art. 9 par. 1* of the GDPR are:

- Heart rate, Galvanic Skin Response (GSR), brain activity via EEG, muscle activity, facial expression, blink rate, eye movement, pupil diameter variations, voice recordings, samples of body posture, answers to the questionnaires on the subject's mood, frustration level, difficulty and or pain experienced in deambulation and movement, perceived level of mental workload.
- At the user's option also audio and visual data outside working hours at his residence can be collected

The processing of such data is done in accordance with the purposes described in Table I.

The data collected during the study will be recorded, stored, processed, analysed for the duration of the project, currently scheduled to last until January 31st, 2022, a date which can be postponed by at most a few months via previous approval by the EU commission.

V – Modality for data processing

In designing the digital data processing, we followed the directives from the GDPR article 25 (Data protection by design and by default), providing an architecture that guarantees that the collected data are kept only for the minimum amount of time to provide the service.

Furthermore, we designed the data management infrastructure so that the directives in GDPR Article 32 (Security of processing) are followed, as we provide data confidentiality through standardized cryptographic primitives and protocols and ensure reliability and timely restore thanks to an encrypted backup system.

Data collection, management and processing are carried out for the purposes indicated above and via sensors and communication infrastructure provided by the WA partners making use of both the WA computers and the WA application, which in turn runs on the smartphone supplied by WA personnel to participants.

All the data stored by the WA application running on the smartphone will be protected by the smartphone whole-storage encryption, and the user will be the only person able to unlock the phone and directly access the data.

All the user-profile data stored on the remote encrypted backup provided by BS are decryptable only by the user, who is the only owner of the required private key.

The network communication in the dedicated WA networking infrastructure deployed in the working-places are protected by secure standardized transport encryption procedures.

The WA automated data processing servers are placed in company, and act on encrypted mass storage devices, to minimize the likelihood of in-processing data theft.

The data collected by WA, and processed by human intervention by UCAM, BS, INTRAS and RWTH resides, on the machines of the said partners. The WA app log files are collected by the smartphone, encrypted in multiple copies, each one under the public key of the partner (among the said ones) in need of receiving the data employing the OpenPGP encryption format. The encrypted data bundles are transferred securely to the machines of the partners. UCAM and BS employ whole-volume encryption techniques on the mass storages where the data are stored, while INTRAS and RWTH resort to physical and network access control to prevent unauthorized access to the cleartext-stored data.

The data collected in the pre- and post-questionnaires are transferred from the encuesta.com service to the INTRAS servers by means of a mechanized transfer via a dedicated program. The data in the said questionnaires is then forwarded by INTRAS, in the

form of GPG encrypted e-mails, to the partners in need of performing statistical analyses jointly on such data and on the answers to the pre- and post-questionnaires.

The WA data kept, under spontaneous and wilfully given consent by the user, for research purposes, will also be manipulated on computers endowed with encrypted mass storage. Whenever encrypted mass storage is not available, the partners take responsibility on the fact that appropriate physical access control to the computers is applied.

Concerning the management of data stored on paper, i.e., the management of the collected consent forms, the participant's name, and the date of the participation, will be the only pieces of personal information entered on the informed consent form.

The forms will include no participant-related reference numbers to make the information on the forms un-linkable with any data captured during the tests.

VI - Data retention for future research activities

The WA project tackles the issue of data retention for future research activities asking explicitly to the participants to either permit or deny the use of their data for further research activities beyond the scope of the project. Raw audio data collected during work will never be used for further research activities. In particular, the WA consortium allows the participants to consent to two levels of data use for research purposes.

- The first one limits the data use for research activities beyond the WA project only to the WA consortium, allowing the reuse of the collected data, but their publication only in anonymous and aggregated form. In this case data are kept for ten years after the last access request by the WA consortium members, for result reproducibility. Access requests will be made to BS, which will act as the consortium member performing digital data archival duties. The access requests will be logged in either paper or digital form (including server logs), at BS's convenience.
- The second option expresses the participant consent to allow the unrestricted use of his data for research purposes. In this case, any reference to the identity of the user will be removed before publication (e.g., no references to the actual name and surname will be kept), however it will not be possible to blur-out faces in visual emotion recognition data.

VII - Profiling

The data collected for the purposes here described will be processed according to an automated process, which does not involve a profiling pursuant to art. 22, paragraph 1 of the GDPR as:

A - does not produce any legal effects on the person concerned.

B- does not produce effects causing automated decision making resulting in effects on the subject.

Indeed, the profile data are only visible to the subject itself, and the WA tool, and do not exit the subject smartphone.

VIII - Categories of recipients

If the subject agrees to take part in the present WorkingAge project we inform that - in addition to the aforementioned partners participating in the research - the data will not be shared with any other entity without consent. In particular, if the subject does not consent

to the use of her/his data for research purposes beyond the project goals, the data will not be shared with anyone outside the project consortium.

IX - Transfer to a non-EU country

The data will circulate in the EU area with the exception of the partner institutions present in United Kingdom for which it is guaranteed that the personal data will be treated according to the GDPR regulations, nonetheless.

The WA consortium will ensure that, in the, currently unforeseen, event of data transfer outside the EU, the data treatment outside the EU will be made in compliance with both the local applicable legal provisions, and subject to the stipulation of the standard contractual clauses provided by the European Commission.

X – Rights of Subjects

If your personal data are being processed, you are affected by the GDPR and you have the following rights against the controller:

1. Right to information

You can ask the data controller to confirm whether they are processing personal data concerning you.

If such processing exists, you can ask the person responsible to provide the following information:

- The purposes for which the personal data are processed.
- The categories of personal data being processed.
- The recipients or categories of recipients to whom the personal information about you has been or will be disclosed.
- The planned duration of the storage of personal data concerning you or, if specific information on this is not possible, criteria for the determination of the storage period.
- The existence of a right to rectification or deletion of personal data concerning you, of a right to limitation of the processing by the controller or of a right to object to such processing.
- The existence of a right to appeal to a supervisory authority.
- All available information on the origin of the data if the personal data is not collected from the data subject.
- The existence of automated decision-making, including profiling in accordance with Articles 22(1) and (4) GDPR and – at least in these cases – meaningful information on the logic involved and the scope and intended effects of such processing for the data subject.

2. Right to correction

You have the right to correct and/or complete any personal data processed concerning you that is incorrect or incomplete. The person responsible shall make the correction without delay.

3. Right to limitation of processing

You may request that the processing of personal data concerning you be restricted under the following conditions:

- if you dispute the accuracy of the personal data concerning you for a period of time that allows the data controller to verify the accuracy of the personal data.
- the processing is unlawful, and you refuse to delete the personal data and instead request the restriction of the use of the personal data.
- the data controller no longer needs the personal data for the purposes of the processing, but you need it to assert, exercise or defend legal claims, or
- if you have filed an objection to the processing pursuant to Art. 21 para. 1 GDPR and it has not yet been determined whether the legitimate reasons of the person responsible outweigh your reasons.

If the processing of personal data concerning you has been restricted, such data may only be processed – apart from being stored – with your consent or for the purpose of asserting, exercising, or defending rights or for the protection of the rights of another natural or legal person or on grounds of an important public interest of the Union or a Member State.

If the processing restriction is restricted according to the above conditions, you will be informed by the person responsible before the restriction is removed.

4. Right to deletion

a) Duty to delete

You may request the data controller to delete the personal data concerning you immediately and the data controller is obligated to delete this data immediately if one of the following reasons applies:

- The personal information about you is no longer necessary for the purposes for which it was collected or otherwise processed.
- You revoke your consent on which the processing was based in accordance with Article 6(1)(a) or Article 9(2)(a) of the GDPR, and there is no other legal basis for the processing.
- You file an objection against the processing pursuant to Art. 21 para. 1 GDPR and there are no overriding legitimate grounds for processing, or you file an objection against the processing pursuant to Art. 21 para. 2 GDPR.
- The personal data concerning you has been processed unlawfully.
- The deletion of personal data concerning you is necessary to fulfil a legal obligation under European Union law or the law of the Member States to which the data controller is subject.
- The personal data concerning you have been collected in relation to information society services offered pursuant to Art. 8 para. 1 GDPR.

b) Information to third parties

If the data controller has made the personal data concerning you public and is obligated to delete them in accordance with Article 17(1) of the GDPR, he shall take appropriate measures, including technical measures, taking into account the technology available and the implementation costs, to inform data processors who process the personal data that you as the data subject have requested the deletion of all links to this personal data or of copies or replications of this personal data.

c) Exceptions

The right to cancellation does not exist if the processing is necessary:

- For the exercise of the right to freedom of expression and information.

- To fulfil a legal obligation required for processing under the law of the European Union or of the Member States to which the controller is subject, or to perform a task in the public interest or in the exercise of official authority conferred on the controller.
- For reasons of public interest in the field of public health in accordance with Article 9(2)(h) and (i) and Article 9(3) GDPR.
- For archiving purposes in the public interest, scientific or historical research purposes or for statistical purposes according to Art. 89 para. 1 GDPR, insofar as the law mentioned under a) is likely to make it impossible or seriously impair the attainment of the objectives of such processing.
- For asserting, exercising, or defending legal claims.

5. Right to information

If you have exercised your right to rectification, deletion or limitation of processing against the controller, the controller is obligated to notify all recipients to whom the personal data concerning you have been disclosed of such rectification or deletion or restriction of processing, unless this proves impossible or involves disproportionate effort. You have the right vis-à-vis the person responsible to be informed about these recipients.

6. Right to data transferability

You have the right to receive the personal information about you that you have provided to the owner in a structured, common and machine-readable format. In addition, you have the right to transmit this data to another person in charge without obstruction by the person in charge to whom the personal data was provided, provided

- The processing is based on a consent pursuant to Art. 6 para.1 lit. a GDPR or Art. 9 para.2 lit. a GDPR or on a contract pursuant to Art. 6 para. 1 lit. b GDPR and
- Processing is carried out using automated methods.

In exercising this right, you also have the right to have the personal data concerning you transferred directly from one data controller to another data controller, insofar as this is technically feasible. The freedoms and rights of other persons must not be affected by this.

The right to data transfer shall not apply to the processing of personal data necessary for the performance of a task in the public interest or in the exercise of official authority conferred on the controller.

7. Right to objection

You have the right to object at any time, for reasons arising from your particular situation to the processing of personal data concerning you in accordance with Article 6(1)(e) or (f) of the GDPR, including profiling based on these provisions.

The controller no longer processes the personal data concerning you unless he can prove compelling grounds for processing that outweigh your interests, rights and freedoms or the processing serves to assert, exercise or defend legal claims.

If personal data concerning you are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for the purpose of such advertising, including profiling, in so far as it is related to such direct marketing.

If you object to the processing for direct marketing purposes, the personal data concerning you will no longer be processed for these purposes.

8. Right to revoke the data protection declaration of consent

You have the right to revoke your data protection consent at any time. The revocation of consent shall not affect the legality of the processing carried out on the basis of the consent until revocation.

9. Right to appeal to a regulatory authority

Without prejudice to any other administrative or judicial remedy, you have the right of appeal to a supervisory authority, in particular in the Member State where you reside, work or suspect of infringement, if you believe that the processing of personal data concerning you is contrary to the GDPR. The supervisory authority to which the complaint was lodged informs the complainant of the status and the results of the complaint, including the possibility of a judicial remedy under Article 78 GDPR.

XI – Contact Point.

The user has the possibility to revoke his consent to the processing of personal data at any time.

To this end, he needs to communicate to the responsible for the consent forms archival (Contact: Fabio BABILONI, privacy@brainsigns.com) to log the revocation of consent. The consent revocation will be logged on paper and archived together with the consent form.

Following this, the user can personally delete the information collected by the WA tool on his smartphone, by a suitable function provided in the WA app. The responsible for the consent form archival will communicate to the other WA partners the reception of the revocation of consent and ask for the data deletion in case the user gave his consent to the data use for further research purposes. The deletion of the data residing on the WA smartphone will also remove the private key representing the unique means to access the remote encrypted backup, rendering the remote data inaccessible.

XII – Expression of the Consent.

By selecting the appropriate checkbox, you expressly declare your free and full consent to the Processing of Data according to the purposes indicated in this information sheet and to the extent to which your consent is required for the purposes of the law.

The expression of at least the first consent option is required and mandatory for the participation to the research. If you don't give such a consent to the first option below you cannot be recruited in the pilot study. We inform you that as an interested party you have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent prior to revocation. Before giving his consent, the interested party is informed of this. Consent is withdrawn as easily as it is granted.

ANNEX A

Privacy statement for the survey services provided by www.encuesta.com.

Original version available at: <https://www.encuesta.com/privacidad/>

1 . Who is responsible for the processing of your data?

The party responsible for the processing of your personal data is WEBTOOLS, S.L., (hereinafter, "**WEBTOOLS**"), with tax identification number B-84794122, and registered address at Paseo de la Castellana número 123, Escalera Derecha, 3ºB, 28046 Madrid.

WEBTOOLS offers its services through its Encuesta.com web application. We hereby inform you that the ownership of the Encuesta.com website domain (hereinafter, the "**Website**") belongs to WEBTOOLS.

Access and/or use of the Website confers the condition of User (hereinafter, the "User"), and implies acceptance, from said access and/or use, of this Privacy Policy.

The User may contact WEBTOOLS at the following email address: [info@webtools.es].

2. Recommendations

Please read carefully and follow the following recommendations:

The Website is not intended for minors. Please activate the parental control to prevent and control the access of minors to the Internet and inform minors about security aspects.

Keep antivirus software installed and properly updated on your computer to ensure that your computer is free of malicious software and spyware applications that put your Internet browsing at risk, as well as the information stored on your computer.

Please review and read the legal texts, as well as this Privacy Policy which Enquete.com makes available to you on the Website.

3. Why is WEBTOOLS entitled to carry out data processing?

WEBTOOLS is entitled to process your data to carry out the provision of the services which you have contracted on the Website.

WEBTOOLS takes the protection of your privacy and your personal data very seriously. Therefore, your personal information is held securely and treated with the utmost care.

This Privacy Policy regulates access to and use of the service (hereinafter, the "Service") which WEBTOOLS, through Encuesta.com, makes available to the User interested in the services and Contents hosted on the Website.

4. What are the purposes of the processing of your personal data by WEBTOOLS?

Your personal data collected by WEBTOOLS via Encuesta.com may be used for the provision of the services offered on the Website.

Likewise, the User consents to the processing of his or her data for profiling and for the segmentation of his or her data. The aforementioned treatments will have as purpose the analysis and the realization of statistics to know the traffic and use of the Web Site by the Users, as well as to be able to offer advertising according to their interests.

5. Accuracy of the data provided by the Users

The User guarantees that the personal data provided are truthful and is responsible for communicating to WEBTOOLS any changes thereto. The User will respond, in any case, the veracity of the data provided, reserving WEBTOOLS the right to exclude from the registered Services to any User who has provided false information, without prejudice to other actions that may apply in law.

6 . Conservation of data

The data collected by WEBTOOLS through Encuesta.com shall be kept for as long as the contractual relationship between the parties is maintained, as long as the User does not request the deletion of said data.

The User is informed that his or her data shall be collected solely for the purposes set out in the previous paragraphs and shall not be processed in a manner incompatible with these purposes.

7. User's rights in relation to their data

The User has the right to (i) access his/her personal data, as well as (ii) request the rectification of inaccurate data or, where appropriate, request its (iii) deletion, (iv) request the limitation of the processing of his/her data, (v) oppose the processing of his/her data and (vi) request its portability. In addition, the User may exercise his/her (vii) right to be forgotten, (viii) right to file a complaint with the supervisory authority, (ix) as well as the possibility to revoke consent at any time.

The User can exercise all these rights at the following email address [info@webtools.es], indicating the reason for his request and providing a copy of his ID card.

The user can also send his request by regular mail to the following address: **WEBTOOLS, S.L. Paseo de la Castellana número 123, Escalera Derecha, 3ºB, 28046 Madrid.**

Without prejudice to any other administrative remedy or legal action, the User shall be entitled to lodge a complaint with a Supervisory Authority, in particular in the Member State in which he has his habitual residence, place of work or place of the alleged infringement, in the event that he considers that the processing of his personal data is not in accordance with the regulations, as well as in the event that he does not see the exercise of his rights satisfied. The supervisory authority to which the complaint has been submitted will inform the complainant about the course and outcome of the complaint.

8. Data security

The protection of privacy and personal data of Users is very important to WEBTOOLS. Therefore, WEBTOOLS does everything in its power to prevent their data from being used inappropriately, allowing access to them only to authorized personnel.

WEBTOOLS maintains security levels of personal data protection in accordance with applicable law and has established all the technical means at its disposal to prevent the loss, misuse, alteration, unauthorized access and theft of data provided by the User through the Website, without prejudice to inform you that Internet security measures are not impregnable.

WEBTOOLS undertakes to comply with the duty of secrecy and confidentiality of personal data in accordance with applicable law, and to give them a safe treatment in assignments and international transfers of data, if any, may occur. In those web services that require registration as a User, a password must be chosen. The User is responsible for maintaining the confidentiality of this password, as well as all activities that occur in the session initiated with your name and password. The User agrees to notify WEBTOOLS as soon as possible the unauthorized use of the username and/or password or any other breach of security. WEBTOOLS will not be liable for any damages or losses that may arise due to non-compliance with this obligation by the User.

9. Changes

WEBTOOLS reserves the right to revise its Encuesta.com Privacy Policy at any time it deems appropriate. For this reason, we would ask you to regularly check this Privacy Policy to read the most recent version of the same. Notwithstanding the foregoing, any change made to this Privacy Policy shall be communicated to the User.

10. Links to web pages

The Website may contain links to websites of third-party companies and entities.

WEBTOOLS cannot be responsible for the way in which these companies treat the protection of privacy and personal data, so we advise you to carefully read the Privacy Policy statements of these websites that are not owned by WEBTOOLS regarding the use, processing and protection of personal data. The terms and conditions offered by these websites may not be the same as those offered by WEBTOOLS.

11. Questions

If you have any questions about this Privacy Policy or the processing of your data, please contact WEBTOOLS by e-mail to the following e-mail address: [info@webtools.es]

12. Acceptance and Consent

The User declares to have been informed of the conditions on protection of personal data, accepting and consenting to the processing thereof by WEBTOOLS, in the manner and for the purposes stated in this Privacy Policy.