



D1.2 Project Setup and Organisation

DAPAS - Deploying AAL Packages at Scale

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Abstract:

The Project setup and Organisation includes information related to the overall organization, internal and external communication, templates for deliverables, reports and presentation, and the risk Management procedures used in the DAPAS project.

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0.1. Versions and Changes

<i>Version</i>	<i>Date</i>	<i>Changes</i>	<i>Name</i>	<i>Organisation</i>
0.1	05.10.2018	Generation of the document	Simone Stückler	EXT
0.2	30.11.2018	Included inputs from partners	Simone Stückler	EXT
1.0	07.12.2018	Final document	Simone Stückler	EXT
1.1	27.04.2020	Include information about PSMB and update executive board	Sabrina Stani	EXT

0.2. List of Authors

<i>Company</i>	<i>Name</i>
EXT – exthex GmbH	Sabrina Stani
EXT – exthex GmbH	Simone Stückler

0.3. Abbreviations

<i>Abbreviation</i>	<i>Descriptions</i>
AAL	Active and Assisted Living
AAL CMU	AAL Central Management
PM	person months
UAB	User Advisory Board
EB	Executive Board
PC	Project Coordinator
URC	User Research Coordinator
WPL	Work Package Leader
NCP	National Contact Point
WP	Work Package
EC	Ethical commission
PSMB	Product Safety Monitoring Board

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1. ABOUT THIS DOCUMENT

1.1. Role of the deliverable

The Project setup and Organisation includes information related to the overall organisation, internal and external communication, templates for deliverables, reports and presentation, and the risk Management procedures used in the DAPAS project.

1.2. Relationship to other DAPAS deliverables

The deliverable is related to the following DAPAS deliverables:

Deliverable	RELATION
D1.1	Consortiums Agreement, includes an overview of the project organisation

Figure 1: Relationship to other DAPAS deliverables

2. Introduction

In the following Project setup and Organisation Deliverable, the overall organization of the project is described.

Abbreviation	Role	Company	Responsible Person
PC	Project Coordinator	EXT	Tanja Kospach
URC	User Research Coordinator	MUV	Erika Mosor
TC	Technical Coordinator	EXT	Sabrina Stani
UAB	User Advisory Board Chair	CDC	Carina Dantas

Figure 2: Coordination roles

3. Description of the DAPAS-project

During the DAPAS project we will build up an innovative solution, which is based on the needs of older adults and their relatives. DAPAS combines successful functions of different service partners. These innovative solutions will be combined and refined into one product that can be distributed on a larger scale, to improve the quality of life of older people and their relatives. The product of DAPAS will be constructed as a tablet app with a cloud backend and includes smart hardware components and a voice assistant. Additionally, during the project, DAPAS will develop the organizational and technical structures, and framework around the packages that allow a distribution and plug & play installation at a bigger scale. With the execution of a

one-year trial phase, the product will be evaluated and tested. A scope of 120 older adults will participate in the 3 pilot sites (Austria, Luxembourg and Portugal), as well as their formal and informal caregivers. The product will be assessed and evaluated during the whole trial phase, comparing participants who use the product with a control group.

4. Project organisation

The structured and well-defined management scheme for DAPAS has been conceived by the Executive Board.

The DAPAS consortium consists of 9 partners. The Project is coordinated by exthex GmbH from Austria. Each partner has specific tasks to perform which are pictured in the Work Plan and the general project structure.

To ensure that the project will result in the expected outcomes according to its objectives, the scientific implementation as well as management work is defined in this document. The overall leadership is assigned to the Executive Board. The work to be done in the project is divided into 6 work packages and further into tasks, each one led by one of the consortium partners.

4.1. Roles within the project

Figure 1 lists all the roles within the DAPAS project.

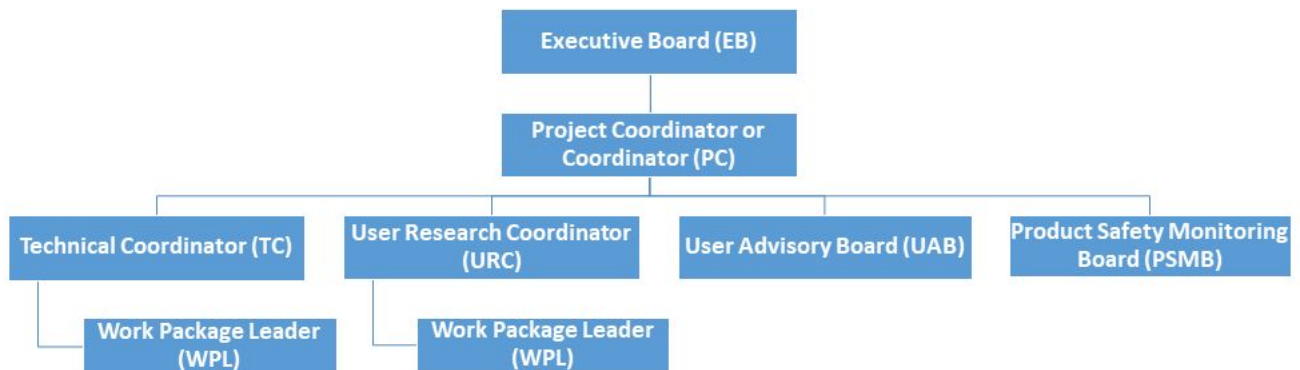


Figure 1: General Project Structure - The general structure lists all the roles within the DAPAS project.

4.1.1. Executive Board – EB

The Executive Board is the supervisory body for the project execution and decision-making and consists of one nominate representative of each party. It assumes overall responsibility for liaison between the *parties* in relation to the *project*.

Organization	Names of the Executive Board:
EXT	Paul Köberl
AIT	Christopher Mayer
CDC	Carina Dantas
MUV	Tanja Stamm
RCS	Beatrix Cichocki-Richtig
DEU	Amaya Mendez Zorrilla
NDU	Sandra Dittenberger
IDE	Iñaki Bartolomé
SHD	Viviane von Dollen

Figure 3: Executive Board

The Executive Board is responsible for:

1. Supporting the Project Coordinator in fulfilling obligations towards the AAL CMU
2. Ensuring that all work meets functional requirements
3. Agreeing on press releases and joint publications by the parties with regard to the project according to the rules in the Consortium Agreement
4. Project risk management
5. Dissemination and exploitation strategy
6. Strategic decisions
7. Resolutions of conflicts
8. Maintaining the IPR directory
9. Advising and directing the parties on the developments necessary for the project

The Executive Board decides in cases of:

1. Coordination, preparation and final approval of reports (technical, financial, etc.) prior to the submission to the AAL CMU
2. All budget related matters
3. Definition, allocation of tasks and changes in work sharing
4. The structure and restructuring of the project
5. The premature completion / termination of the project

4.1.2. Project coordinator – PC

The project coordinator of the project is EXT. The project coordinator is the single point of contact between the AAL CMU and the consortium.

The project coordinator is responsible for the following tasks and functions:

1. Overall management of the project
2. Chairing the Executive Board
3. Preparation of the meetings and decisions of the Executive Board
4. Timely collection and, with the support of the Executive Board, preparation of statements from the parties for transmission to the AAL CMU
5. Ensure prompt delivery of all hardware, software and data identified as deliverable items as requested by the AAL CMU for reviews
6. Management of all aspects related to third parties and the Consortium
7. Administer the financial contribution of the AAL CMU and fulfilling the financial tasks
8. Maintain details of approvals given in relation to material that is subject to controlled license terms

4.1.3. Technical coordinator – TC

The Technical Coordinator is EXT. It is responsible for the successful creation of the DAPAS prototype and the rollout of the user trails. The technical developments are conducted by the technical partners as defined in the work plan.

The technical coordinator is responsible for the following tasks and functions:

1. Coordination of the technical development tasks of DAPAS including specification, implementation and software testing
2. Reporting and monitoring of the progress of work packages covering technical issues to the Executive Board and the Project Coordinator
3. Defining and establishing standards and procedures for the system development
4. Calling frequent technical meetings and conference calls with all technical partners
5. Evaluating software implementation
6. Creating automated test process for new system features
7. Prepare rollout and support for the field trails

4.1.4. User research coordinator – URC

MUV appointed one of its employees from the DAPAS team for being the User Research Coordinator who acts as coordination and communication point for the trial sites. The User Research Coordinator coordinates the reporting of progress to the Coordinator and the General Assembly. The User Research Coordinator assists the trial sites by supporting them from a methodological-medical perspective and by providing information and guidelines to generate comparable trial results. Therefore, the User Research Coordinator will collect information about the inclusion rates from the sites and about the successful conduction of field trials as defined in the work plan.

In strong cooperation with the Ethics Committee, the User Research Coordinator supports the sites to assure the correctness of the trials and the rights of participating volunteers.

Responsibilities

1. Coordination of all tasks devoted to the DAPAS trials including planning, realisation and data assessment of the activities devoted to the evaluation of prototypes in accordance with involved WP and Task Leaders
2. Reporting and monitoring of the progress of accordant tasks in WP5 to the Executive Board and the Project Coordinator
3. Defining trials protocols and standard procedures for the trials
4. Presenting trials results to the technical partners in the form of suggestions for improvements
5. Managing the translation of the texts of the prototypes

4.1.5. User Advisory Board – UAB

The Chair of the User Advisory Board is responsible for coordinating the works of the UAB and also to maintain the communication between this body and the consortium partners. The UAB is a collegiate body that aims to ensure that this project will obey to ethical and deontological principles in research with humans, namely older adults as well as in storage, processing and protection of sensitive personal data. It will further ensure that the perspectives, values and needs of older adults are well represented within the entire project.

Responsibilities

1. Drawing up of the procedures to verify that ethical considerations are being properly addressed throughout the DAPAS project, specifically in research and technological development applied to older adults.

2. Oversee strict compliance of the ethical and moral requirements throughout the various phases of the project, according to standards of integrity, honesty and quality.
3. Assess the issues that arise in the course of the project which are not yet regulated or clear enough from an ethical point of view, as well as regarding preferences, values and needs of older adults.
4. Initiate and proofread lay summaries of project results and participate in the communication towards lay people.

4.1.6. Product Safety Monitoring Board - PSMB

The Product Safety Monitoring Board consists of three Product Safety Officers from the end-user organisations and one person from each technical partner involved in the DAPAS development. The board will meet virtually in case of a safety issue and/or adverse events that might be reported at a trial site via a Product Safety Officer (using the defined support process in **D3.1 Deployment and Support Concept**). The board will then liaise with the User Advisory Board decide on possible necessary consequences.

Organization	Name
RCS - End user partner	Beatrix Cichocki-Richtig
SHD - End user partner	Viviane von Dollen
CDC - End user partner	Carina Dantas
EXT - Technical partner	Sabrina Stani
IDE - Technical partner	Iñaki Bartolomé
DEU - Technical partner	Amaya Mendez Zorrilla
AIT - Technical partner	Christopher Mayer

Figure 3: Product Safety Monitoring Board

4.1.7. Work package leader - WPL

To ensure the performance and progress of the work package (WP) with regard to the overall work plan, a work package leader will be defined for each package.

5. Communication and organisational procedures

During the project DAPAS with 9 partners an extensive communication between the collaborating organizations is required. As a basis, DAPAS uses standard communication techniques such as Email, phone, Skype and face-to-face meetings.

Data handling is the process of ensuring that research data is stored, archived or disposed off in a safe and secure manner during and after the conclusion of a research project. This includes the development of policies and procedures to manage data handled electronically as well as through non-electronic means.

Therefore the DAPAS project complies the general data protection regulation according to the european data protection law.

5.1. Google Drive

The main platform for coordination, sharing and editing documents is Google Drive. Each project member received the log-in via Email. Changes (e.g. new project member joins, project member leaves the organisation, etc.) will have to be communicated to the Project coordinator per email. For all deliverables EXT will provide a first version by using the template. To work collaborative on the documents we use google.docs for our deliverables. A description how to use google.docs is included in the template. Documents should be downloaded as pdf to keep the formatting.

5.2. Email communication and Mailing Lists

For efficient communication within the project, three mailing lists have been set up:

- dapas_all@exthex.com (for communication across all partners; for communication concerning the user-centered design aspects and all user involving activities)
- dapas_tech@exthex.com (for communication regarding technical issues)
- dapas_trial@exthex.com ((for communication regarding trail issues)

These mailing lists will be managed by the Project coordinator. Changes (e.g. new project member joins, project member leaves the organization, etc.) will have to be communicated to the Project coordinator. A list of the contact data of all people involved to the project will be maintained by the coordinator and can be found on Google Drive.

https://drive.google.com/drive/folders/1t5zzNKX_lcK7b5whll3k8ErsR85hPTfW

5.3. Project Meetings

The online status meeting will be held by using Skype. During the kick-off meeting it was decided to have three different types of online status meetings:

- **DAPAS_all** skype held every two weeks, led by the coordinator (EXT): for status updates on all aspects of the project with a focus on WP1 Project management; WP Leader should report on the WP tasks, deliverables and open points; dissemination and exploitation activities should be reported by the partners.
- **DAPAS_tech** skype, held once a month, led by the technical coordinator (EXT): for status updates and discussions related to WP2 (Requirements and Specification), WP3 (Development and Integration) and WP4 (Rollout and Support) tasks.
- **DAPAS_trail** skype, held as needed, led by the Work Package Leader (SDH): focus on the trails concerning WP4 and WP5. The coordinator sends out an agenda of the meeting a few days before the meeting.
- **DAPAS_business** Skype,

The Leader of the meeting is responsible:

- to send out an agenda for the meeting at least one working day before the meeting takes place
- to write the minutes during the meeting
- to send out the minutes via mail and also upload the minutes on Google Drive

5.4. Project Meetings

During the project phase we will also have physical meetings with all partners, namely:

- Kick-off meeting [M1]
- Official midterm review [~M18]
- Project meetings once a year [M12, M24, M34]
- Additional meetings

5.5. Midterm review

Normally, the midterm review takes place 2 months before the half term of the project. The coordinator will inform all partners and will organize the location of the midterm review. The review meeting will last around 4 hours. The CMU will be represented and also the involved NCPs may participate. During the midterm review two external reviewers are invited to assess the status of the project and provide recommendation for the next phase. Before the meeting the consortium has to provide a pre-submission of midterm-review questionnaire and material.

5.5.1. Project meetings

During the Kick-off Meeting the consortium decided to organise Project Meetings once a year. The project coordinator is responsible to initialise the meeting. The meeting should take place in the different countries (Spain, Portugal and Luxembourg).

5.5.2. Additional meetings

Additional meetings, such as WP or technical meetings, will be scheduled upon request and will be held either as face-to-face meeting, virtually or in course of the official project meetings.

5.5.3. Meeting organization

The overall organisation of the meetings are assigned to EXT. Additional meetings can be organised by the leader in agreement with the coordinator.

- Organizer should announce a meeting 2 weeks before
- Announcement shall be followed by a Doodle
- Provide an agenda and additional documents, which are necessary for the meeting
- Provide minutes of the meeting. Use the templates which are provided in Google Drive

5.6. Holidays

To better coordinate and to avoid delays due to longer absences of a single project members, please make sure to:

- inform relevant partners, the WP Lead and Project Coordinator in advance
- nominate a replacement if possible

6. Reporting procedures

6.1. Bi-Annual Reporting

To have an overview of the resources spent within the project a bi-annual reporting is set up. Each partner should provide an report every six month. The template for this report is saved in Google Drive.

<https://drive.google.com/drive/folders/1cgIF-IXLc8liizFGhj1EQWPITcRIVgCK>

The reporting should include

- Progress per WP in the concerned period
- Ressources (PM) per WP in the concerned period

The coordinator will send out a reminder one month before the report is necessary.

6.2. Central progress reports CMU (collection-coordinator)

The coordinator is responsible for the preparation and delivery of the central progress report to the AAL CMU. The central progress report is an annual report and first report has to be generated in month 6, 18, 24 and 36.

The template will be send out two months before the reporting has to provided to the CMU. All partners have to fill out their information and provide the information to the coordinator. The coordinator will collect the information and will send out report to the CMU.

6.3. National reporting

The Reporting to the local National Funding Agencies (NFA) will be done independently because each partner is responsible for their own national reporting.

7. Organisation

7.1. Templates

Templates are saved in Google Drive. Please use the last version from the share.

<https://drive.google.com/drive/folders/1cgIF-IXLc8IilzFGhj1EQWPITcRlVgCK>

Deliverable Templates are already uploaded for each Work Package and Task.

7.2. Review Procedure

The responsible partner for the deliverable is responsible for delivering the document on time. It should be reviewed by the involved partners. The lead partner shall send out an email to the involved partners one week before the due date. The reviewers should work in the google.docs and use the “suggest changes”. The lead partner is responsible to create the final document.

8. Risk management

The following chapter provides an overview on the risk management procedures of the DAPAS project. Risk management is an continuous process throughout the lifetime of a project and addresses the planning of risk management, identification, analysis, monitoring and control. Each project risk could have a cost impact, or affect time scales or product technical characteristic.

8.1. Risk management process

The coordinator EXT is responsible for the T1.2 Quality and Risk Management. EXT will set up a continuous process and manages the risk. The analysis plan is our central tool for monitoring our project.

8.1.1. Identification

To identify a potential risk in the projekt the following structure of workfields in the project are used.

Source of possible risks:

- Technical Risks
- Cost Risks
- Political Risks
- PM-Risks (Project Management Risks)

- Risk concerning staff and employees
- Risk concerning project partners
- Risk concerning Schedule

8.1.2. Analysis Plan

Risk analysis involves examining how project outcomes and objectives might change due to the impact of the risk event. All possible risks will be evaluated to identify the range of possible project outcomes.

Impact classification Matrix:

Probability of Risk Occurrence		
1	Low probability	under 10%
2	Medium-Low probability	10% - 25%
3	Medium probability	25% - 50%
4	Medium High probability	50% - 75%
5	High probability	over 75%

Table 4: Classification Matrix - Probability of Risk Occurrence

Risk Classification Table – Severity		
1	Irrelevant - 1	no limitations
		the budget should be unexhausted
		early finishing expected
2	Low - 2	minimal or litel limitations
		the budget is enough
		the schedule is realistic and fulfillable
3	Critical - 3	several limitations
		little lack of financial reccourses
		delay are possible in the schedule
4	Disastrous - 4	severely limitations
		severely lack of financial reccourses
		no schedule possible

Table 5: Classification Matrix - Severity

Risk description	Risk-class	possible causes	probability of occurrence (1-5)	severity (1-4)	RBZ	arrangements
Development of extra functions that are not required	Technical	a developed function is not part of	1	2	2	continuous communication

		the requirements				of the requirements
Legal boundary conditions	Political	legal changes	2	4	8	monitoring of the legal situation
Ethic Commissions	PM-Risk	problem with Ethical commission because of the long procedure.	2	4	8	good preparation of the documents for the EC. The guidelines provided to all trial sites should be reviewed by the UAB. Relevant documents for the EC should be reviewed by the UAB
Low client satisfaction based on technical problems	Technical	low service quality; bad development concept	3	3	9	user oriented concept development reducing of technical mistakes
Low motivation of user to take part in the trail	PM-Risk	low acceptance towards the product	3	3	9	good product presentation; easy product description
Unplanned requirements; requirements are not included in the plan	Cost-Risk	a hardware is not included in the cost plan	1	3	3	precise requirements engineering
Some project members may leave the project before it is finished.	Staff/employee	a project member resigns before the project has finished	1	2	2	good communication; handover plan
Project partners do not deliver components as agreed upon	Staff/employee	a partner misses the appointment	2	3	6	clear and open schedule; early reminder
Staff needs extra time to learn unfamiliar tools	Staff/employee	a tasks is still open at the end of the deadline	1	3	3	clear and open schedule; early reminder
Conflicts among team members	Staff/employee	2 project members can not cooperate with each other	1	1	1	good communication; team building events

Low motivation of the partners	Partners	a partner is overloaded with other work	1	3	3	fluent communication; presentation of the progress
Oversize project scope	PM-Risk	unclear requirement specification	2	3	6	good planning of the project scope at the beginning of the project
Underestimation of the costs	Cost-risk	the project takes more time than expected	1	3	3	prises cost plan
Lack of resources	PM Risk	be understuffed	2	2	4	detailed estimation of the persons months
Technological components do not fit the purpose or they are of low quality	Technical	no linking possibility	1	1	1	good planning of the software structure
It is not possible to bring the product into service	Technical	ist was not possible to bring a component together	1	1	1	early reaction to arising problems
No realistic schedule	Schedule	a task takes more time than expected	2	3	6	good agreement between the project partners
Tasks are not part of the schedule	Schedule	a task gets out of one's mind	1	2	2	continues review of the schedule
A delay in one task causes cascading delays in dependent tasks	Schedule	a task takes more time and causes a delay in other tasks	1	2	2	continues review of the schedule
Unfamiliar areas of the product take more time than expected	Schedule	the stuff is not familiar with a special software implementation technique	1	1	1	check of the skills in a team before the project has started
Priorities had changed during the project	PM-Risk	user requirements hat changed	1	1	1	continuous monitoring of the requirements

Table 6: Risk classification

REFERENCES

Reference Number	Titel	Athor	Publisher
[1]	General Data Protection Regulation		https://gdpr-info.eu/

ANNEX

USER ADVISORY BOARD REGULATION

Article 1 (Object)

This Regulation establishes the form of action and rules of DAPAS project User Advisory Board (UAB).

Article 2 (Definition)

The UAB is a collegiate body, established within DAPAS project that aims to ensure that this project will obey to ethical and deontological principles in research with humans, namely older adults as well as in storage, processing and protection of sensitive personal data. It will further ensure that the perspectives, values and needs of older adults are well represented within the entire project.

Article 3 (Functions)

1. The UAB is responsible for drawing up procedures to verify that ethical considerations are being properly addressed throughout the DAPAS project, specifically in research and technological development applied to older adults.
2. The UAB shall also oversee strict compliance of the ethical and moral requirements throughout the various phases of the project, according to standards of integrity, honesty and quality.
3. The UAB will also assess the issues that arise in the course of the project which are not yet regulated or clear enough from an ethical point of view, as well as regarding preferences, values and needs of older adults. Together with the steering group, the UAB will support the clarification of these issues.
4. The UAB will initiate and proofread lay summaries of project results and participate in the communication towards lay people.

Article 4 (Composition and obligations of members)

1. The composition and functions of the UAB are established according to the *Standards and operational guidance for ethics review of health-related research with human participants*, established by the WHO.
2. The UAB is composed by 9 members: Chair and 8 other members, with the following profile:
 - The Chair should be a representative of one of DAPAS pilot site and have relevant experience in the assessment of Ethical Compliance of digital solutions for older adults;

- Two members shall be representatives of the other two pilot sites of DAPAS, that should be able to bind the institution into complying with the directives and recommendations of the UAB;
 - Three older adults (aged 65 or more), nominated by the pilot sites;
 - One external advisor with expertise on user perspective and age-friendly environments;
 - One external advisor with expertise on data sharing between study sites on an international level, qualitative and quantitative data analysis and ethical compliance and regulations.
3. The members shall be appointed for the UAB for the whole period of execution of the DAPAS project, being relieved of their duties with its completion. All members can withdraw themselves if they wish or need and appropriate replacements will be nominated.
 4. The members of the UAB must maintain secrecy and confidentiality on the contents of the discussion of all the issues raised in the meetings.

Article 5 (Operation)

1. The UAB normally meets once a year, in principle in a virtual meeting, and extraordinarily when convened by the Chair. Prior to each meeting, the UAB will be informed by the coordinator about project progress, as well as adverse events.
2. The UAB shall act in the presence of a majority of its members, and the decisions are taken by vote, with a simple majority.
3. Decisions of the UAB shall be sent to the whole consortium partners in the week following to the meeting, that will take them into account in the actions and tasks to which they respect

NOMINATION OF MEMBERS FOR THE UAB | November 2018

Chair

Name	e-Mail	Pilot Site
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Site representatives

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Marie-Paul Spielmann	spielmannmp@gmail.com	Stiftung Hëllef Doheem	Nurse, manager of care for an older adults centre

Older representatives

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TBD	TBD	Austria	Österreichisches Rotes Kreuz

ANNEX

9. Art. 13 GDPR Information to be provided where personal data are collected from the data subject

1. Where personal data relating to a data subject are collected from the data subject, the controller shall, at the time when personal data are obtained, provide the data subject with all of the following information:
 - a. the identity and the contact details of the controller and, where applicable, of the controller's representative;
 - b. the contact details of the data protection officer, where applicable;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;
 - e. the recipients or categories of recipients of the personal data, if any;
 - f. where applicable, the fact that the controller intends to transfer personal data to a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means by which to obtain a copy of them or where they have been made available.

2. In addition to the information referred to in paragraph 1, the controller shall, at the time when personal data are obtained, provide the data subject with the following further information necessary to ensure fair and transparent processing:
 - a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject or to object to processing as well as the right to data portability;
 - c. where the processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - d. the right to lodge a complaint with a supervisory authority;
 - e. whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether the data subject is obliged to provide the personal data and of the possible consequences of failure to provide such data;

- f. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
3. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were collected, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph
4. Paragraphs 1, 2 and 3 shall not apply where and insofar as the data subject already has the information.

10. Art. 14 GDPR Information to be provided where personal data have not been obtained from the data subject

1. Where personal data have not been obtained from the data subject, the controller shall provide the data subject with the following information:
 - a. the identity and the contact details of the controller and, where applicable, of the controller's representative;
 - b. the contact details of the data protection officer, where applicable;
 - c. the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
 - d. the categories of personal data concerned;
 - e. the recipients or categories of recipients of the personal data, if any;
 - f. where applicable, that the controller intends to transfer personal data to a recipient in a third country or international organisation and the existence or absence of an adequacy decision by the Commission, or in the case of transfers referred to in Article 46 or 47, or the second subparagraph of Article 49(1), reference to the appropriate or suitable safeguards and the means to obtain a copy of them or where they have been made available.
2. In addition to the information referred to in paragraph 1, the controller shall provide the data subject with the following information necessary to ensure fair and transparent processing in respect of the data subject:
 - a. the period for which the personal data will be stored, or if that is not possible, the criteria used to determine that period;
 - b. where the processing is based on point (f) of Article 6(1), the legitimate interests pursued by the controller or by a third party;

- c. the existence of the right to request from the controller access to and rectification or erasure of personal data or restriction of processing concerning the data subject and to object to processing as well as the right to data portability;
 - d. where processing is based on point (a) of Article 6(1) or point (a) of Article 9(2), the existence of the right to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - e. the right to lodge a complaint with a supervisory authority;
 - f. from which source the personal data originate, and if applicable, whether it came from publicly accessible sources;
 - g. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.
3. The controller shall provide the information referred to in paragraphs 1 and 2:
 - a. within a reasonable period after obtaining the personal data, but at the latest within one month, having regard to the specific circumstances in which the personal data are processed;
 - b. if the personal data are to be used for communication with the data subject, at the latest at the time of the first communication to that data subject; or
 - c. if a disclosure to another recipient is envisaged, at the latest when the personal data are first disclosed.
4. Where the controller intends to further process the personal data for a purpose other than that for which the personal data were obtained, the controller shall provide the data subject prior to that further processing with information on that other purpose and with any relevant further information as referred to in paragraph 2.
5. Paragraphs 1 to 4 shall not apply where and insofar as:
 - a. the data subject already has the information;
 - b. the provision of such information proves impossible or would involve a disproportionate effort, in particular for processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, subject to the conditions and safeguards referred to in Article 89(1) or in so far as the obligation referred to in paragraph 1 of this Article is likely to render impossible or seriously impair the achievement of the objectives of that processing. In such cases the controller shall take appropriate measures to protect the data subject's rights and freedoms and legitimate interests, including making the information publicly available;
 - c. obtaining or disclosure is expressly laid down by Union or Member State law to which the controller is subject and which provides appropriate measures to protect the data subject's legitimate interests; or
 - d. where the personal data must remain confidential subject to an obligation of professional secrecy regulated by Union or Member State law, including a statutory obligation of secrecy.

11. Art. 15 GDPR Right of access by the data subject

1. The data subject shall have the right to obtain from the controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:
 - a. the purposes of the processing;
 - b. the categories of personal data concerned;
 - c. the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries or international organisations;
 - d. where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e. the existence of the right to request from the controller rectification or erasure of personal data or restriction of processing of personal data concerning the data subject or to object to such processing;
 - f. the right to lodge a complaint with a supervisory authority;
 - g. where the personal data are not collected from the data subject, any available information as to their source;
 - h. the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

2. Where personal data are transferred to a third country or to an international organisation, the data subject shall have the right to be informed of the appropriate safeguards pursuant to Article 46 relating to the transfer.
3. The controller shall provide a copy of the personal data undergoing processing. For any further copies requested by the data subject, the controller may charge a reasonable fee based on administrative costs. ³Where the data subject makes the request by electronic means, and unless otherwise requested by the data subject, the information shall be provided in a commonly used electronic form.
4. The right to obtain a copy referred to in paragraph 3 shall not adversely affect the rights and freedoms of others.