



Collaborative Platform for trAnsmedia storytelling and cross channel distribution of EUROPEan sport events

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D8.3: Interim legal and ethical assessment

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Project Partners

Logo	Partner	Country	Short name
	WORLDLINE IBERIA SA	Spain	WLI
	FOUNDATION FOR RESEARCH AND TECHNOLOGY HELLAS	Greece	FORTH
	FRAUNHOFER INSTITUTE FOR TELECOMMUNICATIONS, HEINRICH HERTZ INSTITUTE, HHI	Germany	Fraunhofer HHI
	IBM ISRAEL - SCIENCE AND TECHNOLOGY LTD	Israel	IBM
	NOVA TELECOMMUNICATIONS SINGLE MEMBER S.A.	Greece	NOVA
	EBOS Technologies Limited	Cyprus	EBOS
	VITEC GmbH	Germany	VITEC
	LiveU Ltd.	Israel	LU
	EKTACOM	France	EKT

List of abbreviations

Abbreviation	Definition
AI	Artificial Intelligence
API	Application Programming Interface
DMP	Data Management Plan
DPIA	Data Privacy Impact Assessment
DPO	Data Protection Officer
E2E	End-to-End
EB	Ethics Board
EM	Ethics Manager
EU	European Union
GDPR	General Data Protection Regulation
OTT	Over-the-Top
TuB	Technical University of Berlin
UC	Use Case

Executive Summary

In this deliverable the legal and ethical assessments performed throughout the project up to date are reported. Specifically, the requirements that have been identified in D1.1 “Legal and ethical framework” and D1.2 “COPA EUROPE requirements and use cases definition – Initial version” for research and other activities of COPA EUROPE are considered for this assessment. For the assessment the relevant European Union (EU) legal frameworks that apply to the activities of the project have been considered, based on the findings that have been reported in D1.1.

Ethical risks have been identified, as well as mitigation actions for each specific case. Also, the requirement for a Data Privacy Impact Assessment (DPIA) was explored based on the evidence of the current and foreseen research activities. Finally, the actions with respect to Ethics for the live demonstration event of Use Case 3 that took place in Berlin and involved human research participants are reported in this deliverable.

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1 Introduction

The COPA EUROPE project aims to engage transmedia storytelling of over-the-top (OTT) sports and esports events by providing end-to-end (E2E) integrated streamlined workflows. The project focuses on three use cases (UCs):

1. Disrupting premium sports television services
2. Cultivating European eSports as a broadcasting property
3. “Glass-to-Glass” live coverage streaming over 5G testbeds

To fulfil the goals of the three UCs, the project depends on the engagement of a wide range of actors and stakeholders, from technical partners to general audience (end users). The involvement of human subjects throughout the trials of COPA EUROPE requires the ethical supervision of the project activities, based on the legal and ethical framework adhering to the EU Regulations, as this has been defined in D1.1 “Legal and ethical framework”. In this deliverable, the legal and ethical assessment of the project is performed, by documenting all the actions that have been taken thus far. Moreover, this assessment is based on the material that has been reported in the following deliverables:

- D1.1 “Legal and ethical framework”
- D1.2 “COPA EUROPE requirements and use cases definition – Initial version”
- D8.4 “Data management plan - Initial version”
- D8.7 “Data management plan - Interim version”
- D9.1 “GEN – Requirement No. 1”

1.1 Mapping Project’s Outputs

The purpose of this section, is to map COPA EUROPE’s Grand Agreement commitments, both within the formal Deliverable and Task description, against the project’s respective outputs and work performed.

Table 1: Adherence to COPA EUROPE’s GA Deliverable & Tasks Descriptions

COPA EUROPE Task	Respective Document Chapters	Justification
<p>T8.3.1: Ethical oversight, validation and updates</p> <p><i>“As the technological development of the project evolves, this Task will: i) provide oversight and guidance on the implementation of the legal and ethical requirements in the pursuit of an ethically and legally compliant development that safeguards the privacy and data protection of individuals involved in the use case scenarios; ii) provide clarification on legal and ethical issues that may arise;”</i></p>	4.5– UC3 event in Berlin	In Section 4.5 guidelines of all the necessary steps taken to provide an ethically sound solution for the UC3 live demonstration event in Berlin is discussed.

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<p><i>“iii) develop a Data Privacy Impact Assessment (DPIA) in accordance with the GDPR, to identify potential legal and ethical threats raised by the use of the technology and provide guidance concerning the measures, safeguards and mechanisms needed for the protection of personal data;”</i></p>	<p>4.2 – Data Protection Impact Assessment</p>	<p>In Section 4.2 the necessity for a DPIA in relation to the project activities is discussed.</p>
<p><i>“iv) keep the partners updated with regards to future legal developments that are relevant to the project; and v) validate the solutions from the legal and ethical point of view.”</i></p>	<p>4 – Actions in COPA EUROPE involving ethical aspects</p>	<p>In Chapter 4 all the actions that have been taken up to date to safeguard the project ethically are documented.</p>
<p><i>“A key result of this Task is the DPIA, which is concerned with the implementation of a comprehensive privacy and ethical impact assessment to mitigate the impact of COPA EUROPE on privacy and other fundamental rights and ethical values. It will include an assessment of the impact of the system and its modules on privacy and other fundamental rights from legal and ethical perspectives, and finding ways to mitigate or avoid any adverse effects. To conduct this DPIA, all the consortium members will engage in a collaborative exercise, which can be done through activities such as questionnaires, teleconferences and interviews of the legal and ethics partners with the different stakeholders involved (technical partners and end-users) with the goals of (1) refining the initial analysis and (2) identifying the most adequate mitigation measures. Then, an identification of the ethical and legal risks posed</i></p>	<p>2- COPA EUROPE platform 3- COPA EUROPE risk audit</p>	<p>In Chapter 2, all the components of the COPA EUROPE platform that require ethical oversight are documented.</p> <p>In Chapter 3, potential ethical risks that have been identified are listed with the accompanying mitigation measures.</p>

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<p><i>by COPA EUROPE and the most frequently adopted mitigation measures, will be conducted. This collaboration will serve as a platform for a dialogue between all the partners involved in the project with the common goal to ensure that the final product meets the ethical and legal standards identified in T1.4. The results will be discussed and explained in project meetings and internal workshops, to select the most appropriate and relevant mitigation measures.”</i></p>		
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2 COPA EUROPE platform

Based on the legal and ethical framework, as this has been documented in D1.1, all the building components of the COPA EUROPE platform have been reviewed and assessed with regard to whether they pose a risk from an ethical or legal perspective. All functional components have been listed in Table 2 and have been categorised with respect to their functionality into:

- Core components;
- User applications;
- Content management;
- Processing components;
- Middleware; and
- Analytics.

Table 2: A list of all functional components that comprise the COPA EUROPE platform

Category	Components
Core Components	<ul style="list-style-type: none"> • COPA EUROPE Coordinator • User Authentication • Message Broker
User Applications	<ul style="list-style-type: none"> • End-User XR Application • Data-Driven Graphics Payout Dashboard • Livestream Director • Livestream Producer • Collaborative Transmedia Authoring & Event Production • TV Viewing App
Content Management	<ul style="list-style-type: none"> • Semantically Rich Media Asset Library
Processing Components	<ul style="list-style-type: none"> • Context-Tailored Transcoding & Delivery components • Transmedia Storytelling Tools • Media Artificial Intelligence components • Blockchain
Middleware	<ul style="list-style-type: none"> • Third-Party Social Services • Third-Party Services for Real-Time Data Acquisition
Analytics	<ul style="list-style-type: none"> • Analytics Service

2.1 Functional components requiring ethical oversight

An analysis has been undertaken for each component separately with respect to the methods employed for gathering, storing and processing data. The outcome of this analysis highlights the components which have been identified for potentially requiring ethical oversight and are discussed in the following subsections.

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2.1.1 Semantically Rich Media Asset Library

The Semantically Rich Media Asset Library is the only component that exists in the content management category of COPA EUROPE. It is responsible for hosting and managing the content provided on the COPA EUROPE platform, such as videos and their corresponding metadata. As such, this component may require some legal and ethical oversight, as it must be ensured that the hosted content does not contain anything illegal and that, for example, adult content is censored or removed. Moreover, content rating will be applied on all media available through the platform, thus ensuring that the end-users are only consuming content, which is suitable for their age group. Moreover, to mitigate any potential risks with respect to hosting illegal or sensitive content, the platform will be operating in a controlled environment, as the end users will be research participants during the trials. Nonetheless, in case that users upload content to the platform, which contains personal data, the content will be linked to electronic consent form signed by the uploader prior publishing. In the event of upscaling commercially after the lifetime of the project, the mitigation measures should be redefined. D1.4 “COPA EUROPE requirements and use case definitions -Final version” will contain all requirements with respect to any ethical issues during experimentation, whereas the mechanisms to be employed for satisfying the abovementioned requirements will be documented in the respective deliverable (D3.5).

2.1.2 Transmedia storytelling tools

The transmedia storytelling tools comprise multiple sub-components that help connected subscribers and media professionals in indexing, searching, navigating, synchronising, and editing compelling productions from heterogeneous media sources and a variety of social media channels. It is one of the services responsible for processing the content of the platform and, thus, part of the processing components’ category. In particular, the *Transmedia Storytelling Manager* provides the backend mechanism and the assistive tools for the process of authoring and managing transmedia storytelling. The *Data-Driven Graphics Layout* component interfaces with real-time third-party data application programming interfaces (APIs), to conduct data-driven production of rich, illustrated information, infographics, and visual summarisations. The *Intelligent Narrative Manager* uses Artificial Intelligence (AI) to automatically spot actions within sports or esports videos, a feature that is utilised for understanding and analysing the events occurring in a game. Finally, the *Layout Manager* constitutes a layout and interaction framework targeting a variety of dashboard applications for a wide range of smart surfaces to allow spectators an enhanced and personalised viewing experience. Some of these sub-components store and process media in various formats, including images. Especially because these components can not only be used by media professionals but also by end users, it must be ensured that sensitive or illegal data is not stored, used, played out, and, if necessary, it will be censored or entirely removed.

Similarly to the Semantically Rich Media Asset Library, to mitigate any risks with regard to importing illegal or inappropriate content, the platform will only be tested by specified end users during the trials. However, as mentioned earlier for the Semantically Rich Media Asset Library, content rating and age classification will be applied for the uploaded content. Moreover, as it has already been identified in the latest version of the Data Management Plan (DMP), which was documented in D8.7 “Data management plan – Interim version”, images of players from the esports events are used based on image copyrights owned by our Stakeholders’ Board members. However, in case that the use of players’ images poses challenges, the possibility of replacing them with avatars has been explored and can be used alternatively.

2.1.3 Middleware components

The Third-Party Social Services component is part of the middleware category along with the third-party services for real-time data acquisition. The Third-Party Services for Real-Time Data Acquisition component retrieves live data from COPA EUROPE events and interacts with external APIs that report in real time in-game statistics as well as specific information about players, game status and in general valuable data that describe the overall status of the game. As no personal or other sensitive data are interacting within this component, it does not

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require ethical oversight. On the other hand, the Third-Party Social Services component acts as a bridge between various social media platforms, such as Twitter and Facebook, and offers a unified interface for other COPA EUROPE components to interact with these social media platforms. This component is mainly used to post media content about events or to retrieve up-to-date information about events. In this capacity, there may be the need for ethical oversight as it must be ensured that the information posted does not contain any sensitive data (e.g., event photos that contain underage attendees without parental consent). UCs of COPA EUROPE are executed in a controlled environment and thus, it does not pose an ethical risk at this moment. Moreover, research participants in the events organised by the project are requested to provide an informed consent form, in which they are informed about COPA EUROPE and its objectives, as well as the purpose for collecting their personal data. For example, the individuals who participated in the live event concerning UC3 between 9 and 11 of May 2022 in Berlin were provided with the consent form available in Annex I.

2.1.4 Analytics Service

The Analytics Service component receives usage information from all COPA EUROPE components in the form of events (e.g., page views). The data will then be stored and made available internally in the form of dashboards and reports. This component will be based on the open-source Matomo, which is General Data Protection Regulation (GDPR)-compliant analytics engine. Still, this component might require ethical oversight, as it needs to be made sure that only anonymised usage data is sent to the analytics engine. Currently, the Analytics Service component is in development.

2.2 COPA EUROPE components that require ethical oversight

In conclusion, there are multiple components of the COPA EUROPE platform that we have identified as potentially requiring ethical oversight. None of these components, however, inherently require the gathering, storing, or processing of de-anonymised user information, and only have the potential of accidental leakage of such data. The following list enumerates all components that may require ethical oversight:

- Semantically Rich Media Asset Library
- Transmedia Storytelling Tools
- Third-Party Social Services
- Analytics Service

To this end, actions that have been taken thus far to safeguard COPA EUROPE from any ethical or legal implications are discussed in the rest of the document, based on the legal and ethical framework, as it was identified in D1.1.

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3 COPA EUROPE risk audit

Based on the legal and ethical framework, as this has been defined in D1.1 “Legal and ethical framework”, a list of risks associated to legal and ethical background have been identified and are presented in Table 3. Risks ER1 – ER11 are part of the project’s overall risk assessment and are constantly monitored by the Ethics Board (EB), whereas actions for their mitigation have been proposed. In the event new risks arise or old risks are no longer valid, the Ethics Risk registry is continuously updated. Currently, all three UCs have had their first trials. However, only UC3 has required the involvement of the Ethics Manager (EM), at this stage.

Table 3: List of ethical and legal risks

Risk #	Description of risk	WP affected	Risk Trigger	Risk Owner	Status	Proposed measures and preventive actions	Mitigation actions
ER1	Personal and/or sensitive data breach	WP1 WP3 WP4 WP8	<ul style="list-style-type: none"> Bad publicity Messages through SM or website 	WP/Task Leaders	Unmaterialised	<ul style="list-style-type: none"> Investigate which organisational and technical measures are taken Update DMP frequently (data inventory, tasks related, etc.) Ensure GDPR principles adhered to (purpose, retention period etc.) Subject rights enablement Storage location/ Repositories and safety Data transfers D&C to monitor news/bad publicity/contact us messages. 	Depending on nature of data: <ul style="list-style-type: none"> Notify authority Notify data owners affected Notify consortium and PO Consult Legal advisor/EB team Issue statement
ER2	Project output in terms of deliverables imposes risks on E&L issues.	All	<ul style="list-style-type: none"> Testing session results fail on E&L 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Review of deliverables and software modules to verify Testing sessions to include security aspects 	<ul style="list-style-type: none"> Inform involved partner(s) Analyse the thread and take action (edit reports/change software components)
ER3	Security elements not included in the COPA Architecture in all relevant modules.	All	<ul style="list-style-type: none"> Testing session results fail on E&L 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Review of deliverables and communication with architectural partners to ensure inclusion of Ethics/ Legal considerations 	<ul style="list-style-type: none"> Inform involved partner(s) Analyse the thread and take action (revisit software components & revise)

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Risk #	Description of risk	WP affected	Risk Trigger	Risk Owner	Status	Proposed measures and preventive actions	Mitigation actions
	(building blocks as per section 2)						
ER4	Use Cases definition does not include Ethics considerations by design.	All	<ul style="list-style-type: none"> Testing session results fail on E&L 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> D1.2 already included aspects and UCs definition As per development use cases review for ensuring security elements 	<ul style="list-style-type: none"> Inform involved partner(s)/EB team Analyse the thread and take action (redesign use cases/alter set up conditions)
ER5	Activities involving research participants do not cater for Consent and research integrity principles.	All	<ul style="list-style-type: none"> Bad publicity Messages through SM or website 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Request and archive consent forms obtained Investigate how the purpose of research was communicated 	<ul style="list-style-type: none"> Inform partners involved/EB team Obtain consents or delete data concerned
ER6	Personal data is used for profiling and advertisement.	All	<ul style="list-style-type: none"> Bad publicity Messages through SM or website 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Monitor and prevent profiling (based on behaviour and habits collection) with advertisement 	<ul style="list-style-type: none"> Identify thread and related partner Remove personal data used for profiling
ER7	Technological components developed leading to breach in Ethics/ Legal considerations.	All	<ul style="list-style-type: none"> Testing session results fail on E&L 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Technologies like ML, IoT and AI to be investigated (if applicable to COPA) Blockchain as the chosen method for transactions will be reviewed 	<ul style="list-style-type: none"> Inform involved partner(s)/EB team Analyse the thread and take action (revisit software components & revise)
ER8	Free flow of non-personal data restricted.	All	<ul style="list-style-type: none"> Testing session results fail on E&L Restricted flow evidenced from communication of users 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Architectural considerations to ensure openness but at same time reinforce data security 	<ul style="list-style-type: none"> Inform involved partner(s)/EB team Analyse the thread and take action (revisit software components & revise)

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Risk #	Description of risk	WP affected	Risk Trigger	Risk Owner	Status	Proposed measures and preventive actions	Mitigation actions
ER9	Online platforms regulatory framework issues (responsible, transparent, trustworthy).	All	<ul style="list-style-type: none"> Testing session results fail on E&L Restricted flow evidenced from communication of users 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Architectural considerations with technical partner(s) to ensure aspects. 	<ul style="list-style-type: none"> Inform involved partner(s)/ EB team Analyse the thread and take action (revisit software components & revise)
ER10	Automated decision-making (eg UC1), Competition Law leading to violation of principles.	All	<ul style="list-style-type: none"> Testing session results fail on E&L Restricted flow evidenced from communication of users 	WP/Task Leader	Unmaterialised	<ul style="list-style-type: none"> Ensure that collection of data does not violate GDPR principles. Fairness and antitrust principles to be investigated 	<ul style="list-style-type: none"> Inform involved partner(s)/ EB team Analyse the thread and take action (revisit software components & revise)
ER11	Data subjects' Subject Rights not complied to.	All	<ul style="list-style-type: none"> Bad publicity Messages through SM or website 	WP/Task Leader	Unmaterialised	Make sure mechanisms of responding and acting on data subject's rights (delete, amend, notify, inform, etc.) from processing partners are activated.	<ul style="list-style-type: none"> Inform involved partner(s) Analyse the thread and take action (revisit mechanisms for responding, processing of data in line with GDPR principles)
ER12	Mature content in the platform is accessed by underaged users.	WP1 WP2 WP3 WP6 WP8	Testing session results fail on E&L	WP/Task Leaders	Unmaterialised	Make sure content rating is applied for all content provided through the COPA EUROPE platform	<ul style="list-style-type: none"> Notify end-users and in case of minors, their parents/legal guardians Issue legal statement
ER13	Underaged users are trying to access adult rated content	WP1 WP2 WP3 WP6 WP8	Testing session results fail on E&L	WP/Task Leaders	Unmaterialised	Require age verification of user upon registration to access adult-rated content. The requirements will be defined in D1.4, whereas the processes will be established before the UCs execution.	<ul style="list-style-type: none"> Notify parents/legal guardians of minors exposed. Issue legal statement

4 Actions in COPA EUROPE involving ethical aspects

COPA EUROPE is foreseen to participate in numerous events and other activities where the active involvement of human research participants is taking place. Such activities involve the participation of individuals in the research activities, as this has been already implemented for the purposes of UC3, the use of resources stemming from sports and esports events, and the utilisation of the COPA EUROPE platform by the end users, where they are able to upload their content. It is therefore of paramount importance to safeguard the project ethically by following the legislation and all appropriate actions, as these have been reported in D1.1, including GDPR [1], ePrivacy Regulation [2], Free Flow of Non-Personal Data Regulation [3] and Platform-to-Business Regulation [4].

4.1 Data management plan

The DMP is a vital component for monitoring the activities of the project on partner and consortium level, with respect to the collection, processing and/or storage of personal data. Currently, the DMP has been updated twice officially with the submission of the preliminary and interim versions of D8.4 and D8.7. Additionally, the DMP has been updated on an ad-hoc basis whenever the need arises. Moreover, in the aforementioned deliverables important information for the data used in the project, as well as the corresponding internal data policy and assigned data protection officer (DPO) of each organisation is provided.

4.2 Data Protection Impact Assessment

According to Article 35 of the GDPR, a DPIA is required for any project that is likely to involve “a high risk” to other people’s personal information. More specifically, a DPIA would only be necessary if any of the following reasons applied for COPA EUROPE [5]:

- An automated decision making, such as profiling, for a systematic and extensive evaluation is applied to the personal data related to natural persons.
- An extensive processing of sensitive data occurs.
- A systematic monitoring of public areas occurs on a large scale.

Based on the input received by the project partners via the DMP, as well as discussions during the project meetings, there is no need for a DPIA at this stage for COPA EUROPE, since none of the three conditions mentioned earlier are met. This is also confirmed by our independent Ethics Advisor, Mrs Rosanna Garreta, in D9.1 “GEN – Requirement No.1”. In the event new evidence that reveals the need for a DPIA emerges, such actions will have to be taken prior to any data processing.

The project does not require any sensitive data for fulfilling its research goals and is not foreseen to be involved in any of the actions mentioned earlier, which constitute prerequisites for a DPIA. Nonetheless, the EB is closely monitoring the activities of the project in case the research needs of the UCs evolve to a direction where a DPIA is required.

One example where a DPIA would be required was if it was decided to stream the UC3 live feed, further described in Section 4.5, over our YouTube channel. As YouTube is established in a non-EU country, the consequences of transferring personal data in the form of videos containing faces to a non-EU country and what implications this action has should be considered. For such actions, a DPIA would be mandatory.

4.3 Ethics Board

An EB has been formed to provide the ethical oversight of the COPA EUROPE project under the supervision of an independent Ethics Advisor (Mrs Rosanna Garreta, WLI). The main aim of the EB is to ensure that any activities related to the project, including trials involving human participants, are performed while adhering to the legal

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and ethical requirements of the project. Three EB meetings have taken place. During these meetings any aspects involving ethical considerations have been discussed. Ad-hoc meetings also take place, when needed (e.g., for the organisation of UC3 live demo event).

In general, the EB has the following roles during the project's lifetime:

- a. Inform and support the consortium with relevant practices and regulations regarding Ethics;
- b. Constantly review and update the DMP as the project's data inventory and source of potential risks, as well as the risk assessment registry containing risks of the projects;
- c. Identify deliverable reports, events or other project outputs that would entail risks associated to the ethics' context;
- d. Monitor and check partners' actions in a certain framework and whether policies of the project are followed; and
- e. Analyse information and decide on the Data Impact Identification Assessment requirements depending on the parameters set by the GDPR regulation.

The members of the EB are listed in Table 4. Other members of the consortium can be added to the EB if required.

Table 4: Members of the Ethics Board

Name	Organisation	Role
Antonio Paradell	WLI	Project coordinator
George Margetis	FORTH	Technical manager
Yerasimos Yerasimou	EBOS	Ethics manager
Dany Moshkovich	IBM	Member

Moreover, the EB is foreseen to have a monitoring role throughout the project. Thus, deliverables that have been selected based on their content will be reviewed in case they contain material that could compromise the project from an ethical and/or legal point of view. Similarly, tasks and project outputs that have been identified as high-risk are constantly monitored by the EM and the rest of the team. Table 5 lists the tasks and deliverables that have been identified by the EB and their actions are continuously monitored. More specifically, the deliverables related to the requirements and UC definitions are monitored, as well as the work related to the project's architecture, in order to ensure that there aren't any ethics-related issues with the technologies developed in COPA EUROPE. Moreover, the initial work on blockchain was monitored to confirm that no personal data are collected and stored. The list presented in Table 5 contains the items that have been reviewed thus far and those that will be reviewed in the following months of the project. The list will be constantly updated throughout the project, as new developments occur and deliverables are produced.

Table 5: Deliverables, tasks, and outputs identified by the Ethics Board as high-risk

#	Title	Type	Description
D1.2, D1.4	COPA EUROPE requirements and use cases definitions	Deliverable	Ethical considerations outlined and ensured for the Privacy-by-Design principle

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#	Title	Type	Description
D1.3, D1.5	COPA EUROPE architecture	Deliverable	Review privacy elements and architectural components (<i>e.g.</i> , user authentication) to ensure security framework.
T1.1	Use cases definition and refinement	Task	Ensure no personal data is involved and if involved technical measures are taken.
D4.1	Blockchain network design and setup	Deliverable	Ensure no ethical issues are related to the blockchain network developed for the COPA EUROPE platform.

The EB objectives remain active throughout the duration of the project. The identification of risks, data to be produced or collected throughout the project are under constant review on an ongoing basis rather than a one-off exercise to make sure the actions and measures taken remain relevant and effective till the project end.

In summary, decisions, recommendations and suggestions by the EB within its mission and objectives will be communicated formally to Consortium members and record keeping will be followed with actions and plans to make sure that any points raised are thoroughly followed and activities are executed towards minimising risks.

4.4 Underaged users

The final COPA EUROPE platform will provide a set of features and functionalities that will be appealing for a wide range of audience groups. It is thus expected that underaged users will also be using the project’s services. Therefore, special attention is given during the design, development and deployment phases to accommodate such users. Article 8¹ of the GDPR states the conditions which are applicable to the consent of children in relation to information society services. Specifically, in case an informed consent is given by a child, processing of its personal data is lawful if the child is at least 16 years old, whereas for children under the threshold of 16 consent must be given or authorised by their parent and/or legal guardian. On the other hand, the data controller should make reasonable efforts to verify that the consent is given or authorised by the parent and/or legal guardian for children under the age of 16.

As mentioned in Section 2.1, COPA EUROPE will implement mechanisms for verifying the age of the user and in case the account belongs to an underaged person, consent will be collected by the holder of parental responsibility. Moreover, the content provided through the COPA EUROPE platform will be filtered based on its age suitability. More details regarding the requirements for the deployment of this technology will be presented in D1.4 “COPA EUROPE requirements and use cases definition – Final version” (due in M24). Finally, in Chapter 3, specific risks (ER12, ER13) related to underaged users have been identified and mitigation measures have been proposed for handling them.

4.5 UC3 event in Berlin

A live event demonstrating the concept of UC3 took place in Berlin. Specifically, “glass-to-glass” multi-cloud multi-component live production over 5G cellular network of sports events was piloted. The two-days table tennis tournament was held near the Fraunhofer grounds in Berlin (TuB), mainly targeting students and academic staff of TuB. The UC3 live demonstration was a cross-collaboration between five project partners that resulted in the successful setup of a full live video “supply chain” to ingest, process, and distribute multiple audio/video streams.

¹ Art. 8 GDPR (<https://gdpr-info.eu/art-8-gdpr/>)

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As the event involved human participants, several actions were performed for retaining compliance with GDPR. Such actions included the organisation of an EB meeting prior to the event, in which partners from EBOS (EM), WLI (Project Coordinator), FORTH (Technical Manager) and LU (UC3 leader) participated. The agenda of the meeting included details of the live event; particularly the processes that shall be followed for the collection, processing and sharing of personal data of the participants were discussed. The following actions were agreed for the event:

- The participants were provided with an information sheet containing details for the project and the specific event. The information sheet distributed at the event is available in Annex I.
- The participants signed an informed consent form, stating they had been informed for the purposes of the research actions and they agree to the processing of their data. The template of the informed consent form is also available in Annex I. The consent forms were collected and stored by the FHHI DPO, after they had been anonymised.
- The functionality of each component to be used in the UC3 event and to what extent this involved any ethical aspects were clarified.
- In the live event, signs stating the existence of a live event in progress were placed at the entrance and other visible locations on the event premises. Additionally, a film-free zone was provided for whoever wanted to observe the event without being filmed, and thus be included in the data collected by the UC.
- The footage from the event was live streamed through the COPA EUROPE platform and the project's dedicated YouTube channel. In order to avoid any ethics-related complications, the YouTube streaming was shared only with project partners through private links, thus only for fulfilling the research activities of the project. The live stream feed was stored by FORTH for further processing within the context of the project's research activities and in line with the project's DMP.

5 Conclusions

In conclusion, this deliverable has provided an intermediate legal and ethical assessment, based on the legal and ethical framework, as this was formed in D1.1 and the initial technical requirements of COPA EUROPE that were reported in D1.2. Additionally, the DMP deliverables and the report produced by the project's external Ethics Advisor have provided important resources for this assessment.

Based on the relevant EU Regulations, and in particular the GDPR, the ePrivacy Regulation, the Free-Flow of Non-Personal Data Regulation and the Platform-to-Business Regulation, the various building components of the project have been evaluated in close collaboration with the technical partners. As a result, the components which have been singled out as requiring the attention of the EB are closely monitored throughout their development.

In addition, a list of ethical risks that could materialise in the lifetime of the project has been identified. Monitoring those risks and potentially identifying new ones as the project progresses, remains an active task of the EB. Monitoring and already designing specific actions to ensure adherence to policies remains a pivotal part of the ethics in this project in spite of not requiring a DPIA at this moment.

This deliverable constitutes the interim legal and ethical assessment with its final version due at the end of the project (M36). The next version will conclude the ethics oversight, which accompanies all research activities with particular attention towards the experimentation phase, whereas the final components of the COPA EUROPE platform will be evaluated along the technical partners to ensure that the final outputs abide by the legal and ethical requirements.

6 References

- [1] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, OJ L 119, 4.5.2016, p. 1–88.
- [2] Directive 2009/136/EC of the European Parliament and of the Council of 25 November 2009 amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services, Directive 2002/58/EC concerning the processing of personal data and the protection of privacy in the electronic communications sector and Regulation (EC) No 2006/2004 on cooperation between national authorities responsible for the enforcement of consumer protection laws (Text with EEA relevance). OJ L 337, 18.12.2009. p. 11-36.
- [3] European Commission. (n.d.). *Proposal for an ePrivacy Regulation*. <https://digital-strategy.ec.europa.eu/en/policies/eprivacy-regulation>
- [4] Regulation (EU) 2018/1807 of the European Parliament and of the Council of 14 November 2018 on a framework for the free flow of non-personal data in the European Union (Text with EEA relevance.) PE/53/2018/REV/1, OJ L 303, 28.11.2018, p. 59–68.
- [5] *Data Protection Impact Assessment (DPIA)*. (n.d.). gdpr.eu. Retrieved June 15, 2022, from <https://gdpr.eu/data-protection-impact-assessment-template/>

Annex I: Information sheet and consent form for UC3 live event



Collaborative Platform for trAnsmidia storytelling and
cross channel distribution of EUROPEan sport events.

Information sheet for participating in COPA EUROPE project

You are invited to take part in Glass-to-Glass trial of the COPA EUROPE project. This form contains information that will help you decide whether to take part in the research activities.

KEY CONTACT DETAILS

Controller of the data collected during the co-creation workshops

COPA EUROPE PROJECT

Contact details of the person in charge of data collection

On site event organization in charge (even organization, participant contact, data collection, data anonymization): Kirsten Krüger, FHFI, kirsten.krueger@hhi.fraunhofer.de

KEY INFORMATION ABOUT THE PROJECT

Project Coordinator: WORLDLINE IBERIA SA- WLI

Funding Program: Horizon 2020

Website and contacts: <https://www.copaeurope.eu/> / info@copaeurope.eu

INTRODUCTION

COPA EUROPE aims to address the exploding demand for non-linear sports consumption (live and eSports) by leveraging Over the Top (OTT) and combining it with new set of media technologies that will democratise the consumer experience, enable cost-sensitive live video from anywhere, and personalize the distribution to change the experience of each viewer individually. I am also informed that COPA EUROPE will deliver a cloud-based infrastructure for harvesting, accommodating, transmitting, and distributing digital media with regard to sport and competitive events, including the infrastructure needed to allow content creators and producers of live coverage to react to live outcomes, via innovative workflows. In order to achieve the objectives, three use cases are foreseen during the three phases of the project. These include requirements gathering, lab testing, trial validation, user evaluation and small-scale assessments with users. The aim of the use cases is to analyse and assess usability, technology acceptance and impact creation. The use cases will involve volunteers, relevant to the predefined use-case environments.

For more information, please refer to the project's website: <https://copaeurope.eu/privacy-policy/>

PURPOSE OF THE RESEARCH

The purpose of this event is the first trial of the COPA EUROPE live Glass-to-Glass use case. It will test the video flow from camera to viewing applications in a 5G network. The data collected is of the components' performance and of participants' feedback. It may be used to improve the use case components.

PROCEDURE OF THE RESEARCH ACTIVITY

Participants will play one another in a table tennis tournament. This tournament, games and potential happenings around the games, will be transmitted live via cameras and smartphones of the COPA EUROPE partners to the cloud and from there to the COPA EUROPE smartphones back on-site for



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viewing experience, and potentially to other smartphones. The live video will also be sent to COPA EUROPE component for storage and later analysis. No “reruns” or re-broadcasting will be done.

Participants will be asked for their feedback on the trial, including questionnaire or other forms of expressing their feedback, if any.

PERSONAL DATA

Personal data procurement and management within COPA EUROPE will strictly comply with the provisions of GDPR 2016/ 679.

The project in general will follow data minimisation principles and any data will be “anonymized”, i.e., collected and stored in a way that can not be traced back to an individual trial or demonstrator participant. Media content that are part of a collective data set cannot be anonymised.

In accordance with the GDPR Article, EU Member State implementations, COPA EUROPE will adopt a general **data controller / data processor** architecture for the handling and management of personal data. COPA EUROPE trials and live demonstrators launched for evaluation will involve the collection or processing of personal data and therefore all partners responsible may be called up to act as data controllers (NOVA, FORTH, LU, , WLI and eBOS).

The COPA EUROPE consortium is committed to perform the project in compliance with the GDPR and any implementing local legislation (collectively referred to as the “EU Data Protection Legislation”). To this end, the partners will ensure that no Personal Data (as such term is defined in the GDPR) will be shared between the partners unless (i) it has been fully anonymized prior to the data sharing, or (2) the specific partners who have elected to exchange or otherwise process Personal Data, have entered into separate data processing agreement and have determined what operational measures should be taken prior to such Personal Data exchange or processing, all in accordance with the EU Data Protection Legislation.

The data controllers will also carry the responsibility to manage and delete data, when applicable:

The participant personal data – name and contact details (phone and/or email), will be used to organize the tournament. If requested by the participants not to be kept, then it will be deleted.

The participant personal data – audio/video clips will be transmitted live to the COPA EUROPE applications and will be stored in COPA EUROPE Media Asset Management (MAM) for the duration of the project, without identifying metadata. It shall not be re-broadcasted but it may be re-viewed by the COPA partners during the project lifetime. Video clips can not be deleted before the project ends because they are “group videos” with potentially various other participants and are needed for the COPA EUROPE development under this informed consent.

The participant personal data – role in the industry (if any) will be kept in order to analyse the feedback, if any. Keeping this role without name and/or contact details is possible per request or if personal details are not provided by the participant.

PERSONAL DATA RETENTION PERIOD

Personal data will be stored for a maximum period of five years after the end of the COPA EUROPE project. The project will be completed in September 2023.

RIGHT TO REFUSE OR WITHDRAW

Should any participant(s) wish to withdraw their participation at any time; they can do so by launching a request to the appropriate data controller. Where applicable, participant data will be removed from results already produced, provided it is not yet published or otherwise reported in project deliverables. As stated in Personal Data section, videos or any other media collected at the time of this event can not be deleted.

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You can withdraw your consent to this study at any time, in writing to Antonio Paradell (WLI) - antonio.paradell@worldline.com.

RIGHTS OF PARTICIPANTS

In accordance with principles of research ethics and EU data protection regulations, the participants have rights regarding how their personal data are processed.

1. Right to be informed about the personal data collected in and for the purposes of this study
2. Right to access them, and
3. Right for these data to be in a portable and easily accessible form.
4. Right to rectification
5. Right to erasure
6. Right to restrict processing
7. Right to object to processing
8. Right to not be evaluated based on automated processing
9. Right to file a complaint to the corresponding national Data Protection Authority (*[contact details of national Data Protection Authority]*).

We aim to fulfil all requests. In accordance with data protection legislation, some requests may be rejected.

WHO TO CONTACT?

To exercise your rights, contact the project coordinator, Antonio Paradell (WLI) - antonio.paradell@worldline.com.

For any further information regarding COPA EUROPE project's personal data protection policy, you may visit the website <https://www.copaeurope.eu/privacy-policy/>.

This form and data are regulated by the COPA EUROPE ethics committee. Contact at: yerasimosy@ebos.com.cy



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Informed Consent Form

By signing the attached consent form, I understand that I agree to participate in the COPA EUROPE project funded by the European Union (Grant Agreement no. 957059) and co-ordinated by WORLDLINE IBERIA SA.

<p>I, the undersigned (name/surname) hereby declare that I agree to participate in this study, in the context of the COPA EUROPE project, <i>“Collaborative Platform for trAnsmedia storytelling and cross channel distribution of EUROPEan sport events”</i></p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I agree to participate in this activity in the context of the COPA EUROPE project.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>The purpose of the study, the respective activities and my rights have been explained to me in writing (in the information sheet).</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I am participating voluntarily and understand that I can withdraw from the research activities without repercussions, at any time by the end of the study, and have my data deleted, except in the case of collective media, such as videos, images etc.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I am satisfied that the assurances of responsible and strict data governance, given by the COPA EUROPE project, will be upheld.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I understand that my personal data are kept and treated as confidential as far as this research program is concerned.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I know and understand that my personal data will be kept in a secure environment and that the data controller, as well as any data processors, will take all the necessary and appropriate measures to protect the security, and in particular the confidentiality and integrity, of personal data, according to data protection legislation and the relevant guidelines.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>
<p>I explicitly declare that I agree with the publication of the results of this study in anonymous form and with the publication of selected screenshots for the promotion of the study in mass media, and / or scientific publications aimed at informing the public and / or the scientific community.</p>	<p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

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You may withdraw your consent at any time by submitting a request in writing to (antonio.paradell@worldline.com)

Print name (participant)

Print name (researcher)

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Signature (participant)

Signature (researcher)

.....

.....

Date

Date

.....

.....



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