

D3.1 REPORT ON ETHICAL ISSUES



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GAME TO PROMOTE ENERGY

EFFICIENCY ACTIONS

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Deliverable 3.1 – Version 2

Work-package n°2

| Nature of the deliverable | | |
|----------------------------------|---------------------------------|----------|
| R | Report | X |
| Dec | Websites, patents, filling etc. | |
| Dem | Demonstrator | |
| O | Other | |

| Dissemination Level | | |
|----------------------------|--|----------|
| PU | Public | |
| CO | Confidential, only for members of the consortium (including the Commission Services) | X |



ACKNOWLEDGEMENT

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GreenPlay aims at raising awareness among citizens through the implementation of a real time monitoring energy consumption platform and the development of a serious game

The project runs from March 2015 to February 2018, it involves six partners and is coordinated by ESTIA (École Supérieure Des Technologies Industrielles Avancées, France).

More information on the project can be found at <http://www.greenplay-project.eu/>



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D3 : ETHICS DELIVERABLE

I. INTRODUCTION

The GreenPlay project aims to save energy through people's behaviour change. The solution will combine smart electricity sensors, a website and a game to promote energy efficiency and reduce electricity consumption. User data will be collected in order for the solution to work for research purposes – These data are critical for the project, but they are also personal and therefore sensitive.

The GreenPlay project will protect and respect privacy regarding data collection and use. This deliverable explains what kind of data will be gathered and for what purpose. Of course, the GreenPlay project fits with European Union protection about personal data.

II. DATA COLLECTION

Several kinds of data will be collected during the GreenPlay project. These data are required to enable the solution to work efficiently and to conduct research on the experimentation.

Energy usage and temperature

Sensors will measure the general electricity use, the water heater, the heating consumption and the interior temperature of the household. These data will be collected every 10 minutes during all the experimentation, from 12 months to 18 months.

The GreenPlay project is based on this data collection. It is essential to give to the user feedback about their energy use, to give them advice, and to connect their energy consumption to the serious-game if they want to change their behaviour. These data are needed to help users to save energy.

The energy profile of households

Information is going to be gathered about the energy profile of participating households. A non-exhaustive list of these data is below:

- Address
- Height above ground (e.g. 4th floor, ground floor,...)
- Orientation (e.g. south, east, etc.)



- Insulation type
- Date of construction
- Energy efficiency improvements (e.g. glazing, insulation, ventilation ...)
- Energy efficiency label (BBC, Energy Star)
- Total floor area
- Number of rooms
- Water heater system type and capacity
- Heating system type and number of radiators / heaters in the apartment
- A list of households' appliances
- Approximate glazing surface and type of glazing

These data will be used to help the user to decrease energy consumption by enabling the GreenPlay solution to fit his profile. It is required to provide relevant advice and suitable information depending on his household's energy profile.

This information will also be used during the research conducted to assess the impact on energy efficiency of the GreenPlay solution.

User profile

Information is going to be gathered about user profiles. A non-exhaustive list of these data is below:

- Name
- Apartment number
- Telephone number
- E-mail
- Number of occupants in the household
- Age of occupants
- Lifestyle
- Electricity provider and contract
- Electricity bills of the previous year
- Socio-economic class
- Environmental awareness
- Gamers profile

These data will be used to assist the installation of the solution in each household and to contact the user.

This information will also be used during the research conducted to assess the impact on behaviour change and environmental awareness of the GreenPlay solution.

Additional information may be requested from the users during the experimentation to better understand their energy profile or their use of the GreenPlay solution.



III. PRIVACY PROTECTION AND DECLARATION

The European Union protects privacy through the Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. The first article of this directive explains that "In accordance with this Directive, Member States shall protect the fundamental rights and freedoms of natural persons, and in particular their right to privacy with respect to the processing of personal data.". This protection is therefore realized by specific agencies in each country. The GreenPlay project and the solution developed will be implemented in Spain and France. The responsible agencies are AEPD in Spain (Agencia Española de Protección de Datos) and CNIL in France (La Commission Nationale de l'Informatique et des Libertés).

A reform of this Directive is currently underway. It will be taken into account as soon as it will be realized by the European Commission.

Obligations have been established to allow data collection, according to the AEPD website these obligations are:

1. Notify the responsible agency about the file and its characteristics
2. Obtain consent for the treatment of personal data and ensure that citizens are in a position to exercise their rights through information
3. Ensure that the data are appropriate and reliable, obtained lawfully and legitimately and proportionate to the purpose for which they were collected.
4. Ensure data security and confidentiality, to protect them from distortion or disclosure to unauthorised third parties
5. Accept on-site inspections by the agency, and reply to any request for information.

To respect these obligations, the following actions have been done:

1. A declaration has been submitted to CNIL in France and AEPD in Spain. These declarations have been done by eGreen in France and Faimevi in Spain for the GreenPlay project. (*see Annex*)



2. A document describing terms and condition of use will be signed by each user. This document explains the privacy policy and informs users about the use of their personal data. *(See IV. Terms and condition of use)*
3. Data will be collected through three channels, the electricity and temperature sensor installed in the household, the users themselves and the landlord. The goal of this data collection is to help people save energy and to realize research on energy efficiency aspects, behavior change model and serious game usability and user experience. *(See II. Data collection)*
4. Data will be secured throughout the collection and storage phase. Nominative and quantified data will never be communicated to any third party without consent from the users. *(See V. Data use and protection)*
5. Of course, any request for an inspection on-site by the CNIL or the AEPD will be authorized.

IV. TERMS AND CONDITION OF USE

Terms and condition of use will be addressed to each user before getting them involved in the GreenPlay project. This document will summarize the rules which users must understand and agree to before becoming part of the experimentation. Users will have to accept that the consortium will collect data about their household and their energy consumption. The privacy policy will be explained to inform people about the use of their personal data.

This term-of-service agreement is a legally binding document. It will inform users about the way their data will be collected, used, managed and protected.

V. DATA USE AND PROTECTION

The data collected during the GreenPlay project will be used exclusively for this project's purposes. This information will never be communicated with users' name to any third party without consent from the users. Anonymized data may be communicated for dissemination and communication purposes.

The consortium strives to protect user privacy to the best of its ability and to implement advanced technologies for this purpose. Each phase of the data collection and storage is secure.

Data collection and communication over the internet

Data on energy use are gathered through the smart sensors and are sent to an external server over the internet with a gateway connected to the household's internet box. The



communication over the internet is secured by the HTTPS protocol. This protocol encrypts communication with SSL certificates. Consumption information sent over the internet is never named, containing only the sensor ID.

Personal information are collected through forms on the web site. Communication over the internet is also encrypted with the HTTPS protocol.

Data storage

Data will be stored on an external server. A physical server will be installed in a datacenter based in Paris and managed by the company Gandi, a French host provider. This datacenter is ISO 9001:2008 and ISO/CEI 27001:2005 certified.

The configuration of the server and the database are implemented by the consortium and will ensure data protection. Software will always be kept up to date with stable version. Every port to access to the server are shut off except one to authorize SSH access which are a cryptographic network protocol to access to a remote server. Personal data and user identification data are stored in different table.

Data access

Users will have access to their personal data and the serious game on a secure web platform through a web browser. A login and a password are mandatory to access this internal area. Passwords will never be sent by email, and all connections to the web platform are encrypted with the https protocol



VI. ANNEXES

Directive 95/46/EC of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data

<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:31995L0046&from=EN>

The CNIL, the French privacy agency

<http://www.cnil.fr/>

The AEPD, the Spanish privacy agency

<https://www.agpd.es>





FUNDACION AXENCIA INTERMUNICIPAL DA ENERXIA
DE VIGO
CALLE OPORTO 1-1º
36201 VIGO
PONTEVEDRA

Nº Registro Salida: 256063/2015

La Directora de la Agencia Española de Protección de Datos, a propuesta del Registro General de Protección de Datos, ha acordado en virtud de las competencias que le atribuyen los artículos 60 y 61 del Reglamento de desarrollo de la Ley Orgánica 15/1999, de 13 de diciembre, de Protección de Datos de Carácter Personal, aprobado por Real Decreto 1720/2007, de 21 de diciembre y el artículo 12.2.a del Real Decreto 428/1993 de 26 de marzo, vigente de conformidad con lo dispuesto en la Disposición Transitoria Tercera de la citada Ley Orgánica 15/1999, proceder a la/s siguiente/s inscripción/es en el Registro General de Protección de Datos correspondiente/s al/los fichero/s en el/los que figura como responsable FUNDACION AXENCIA INTERMUNICIPAL DA ENERXÍA DE VIGO:

| CÓDIGO INSCRIPCIÓN | NOMBRE FICHERO | OPERACIÓN |
|--------------------|---------------------------|-----------|
| 2152531840 | USUARIOS GREENPLAY ESPAÑA | ALTA |

Las inscripciones en el Registro General de Protección de Datos únicamente acreditan que se ha cumplido con la obligación de notificación dispuesta en la Ley Orgánica 15/1999, sin que de esta anotación se pueda desprender el cumplimiento por parte del responsable del fichero del resto de las obligaciones previstas en dicha Ley y demás disposiciones reglamentarias (estas obligaciones se pueden consultar en www.agpd.es/portalwebAGPD/Deberes.html). De conformidad con lo dispuesto en el artículo 58 del citado Reglamento, la inscripción del fichero deberá encontrarse actualizada en todo momento.

Contra esta Resolución, que pone fin a la vía administrativa, podrán interponer, potestativamente, recurso de reposición ante el Director de la Agencia Española de Protección de Datos en el plazo de un mes a contar desde el día siguiente a la notificación de esta resolución, o, directamente recurso contencioso-administrativo ante la Sala de lo Contencioso-Administrativo de la Audiencia Nacional con arreglo a lo dispuesto en el artículo 25 y en el apartado 5 de la disposición adicional cuarta de la Ley 29/1998, de 13 de julio, reguladora de la Jurisdicción Contencioso-Administrativa, en el plazo de dos meses a contar desde el día siguiente a la notificación de este acto, de conformidad con lo previsto en el artículo 46.1 del referido texto legal.

La Directora de la Agencia Española de Protección de Datos,
Mar España Martí



INFORME DE SITUACIÓN DE INSCRIPCIÓN EN EL REGISTRO GENERAL DE PROTECCIÓN DE DATOS

CIF: G36921278

TOTAL FICHEROS PRIVADOS ACTIVOS: 4

11/09/2015

| RESPONSABLE Y DIRECCIÓN | CÓDIGO INSCRIP. | NOMBRE DEL FICHERO | DESCRIPCIÓN DE LA FINALIDAD | NIVEL MED. SEG. | COLECTIVOS |
|---|-----------------|--|---|-----------------|---|
| FUNDACION AXENCIA INTERMUNICIPAL DA ENERXIA DE VIGO PRAZA DO REI S/N - CASA DO CONCELLO 2 36202 VIGO PONTEVEDRA ESPAÑA | 2071990512 | ALUMNOS CURSOS | GESTION DE CURSOS | BASICO | - CLIENTES Y USUARIOS - ESTUDIANTES - SOLICITANTES - BENEFICIARIOS |
| FUNDACION AXENCIA INTERMUNICIPAL DA ENERXIA DE VIGO RUA OPORTO 1-1º 36201 VIGO PONTEVEDRA ESPAÑA | 2142861764 | DATOS PERSONALES PARTICIPANTES SORTEO PROYECTO EUROPEO MOBI.EUROPE | SOLICITUD DATOS PERSONALES A LOS PARTICIPANTES DEL SORTEO Y SEGUIDORES DE LA PAGINA DE FACEBOOK DE MOBI.EUROPE PARA LA CUMPLIMENTACION DE UNA ENCUESTA DE OPINION SOBRE LA MOVILIDAD DEL VEHICULO ELECTRICO EN EUROPA. | BASICO | - SEGUIDORES DE LA PAGINA DE FACEBOOK DE MOBI.EUROPE INTERESADOS EN PARTICIPAR EN EL SORTEO |
| FUNDACION AXENCIA INTERMUNICIPAL DA ENERXIA DE VIGO PRAZA DO REI S/N - CASA DO CONCELLO 2º 36202 VIGO PONTEVEDRA ESPAÑA | 2071990547 | NOMINAS, PERSONAL Y RECURSOS HUMANOS | GESTION DE NOMINAS Y RECURSOS HUMANOS | BASICO | - EMPLEADOS - BECARIOS |
| FUNDACION AXENCIA INTERMUNICIPAL DA ENERXIA DE VIGO CALLE OPORTO 1-1º 36201 VIGO PONTEVEDRA ESPAÑA | 2152531840 | USUARIOS GREENPLAY ESPAÑA | GESTIÓN DE LA APLICACIÓN GREENPLAY, PARA CONSEGUIR AHORRO ENERGÉTICO EN HOGARES. COMBINA SENSORES ELÉCTRICOS INTELIGENTES, UNA WEB Y UN JUEGO. LOS DATOS SERÁN UTILIZADOS EXCLUSIVAMENTE PARA LOS PROPÓSITOS DEL PROYECTO. ESTA INFORMACIÓN NUNCA SERÁ COMUNICADA NOMINATIVAMENTE A NINGUNA ORGANIZACIÓN FUERA DEL CONSORCIO SIN EL ACUERDO DE LOS USUARIOS | BASICO | - CLIENTES Y USUARIOS - SOLICITANTES - BENEFICIARIOS |

RÉCÉPISSÉ

DÉCLARATION NORMALE

Numéro de déclaration

1885799 v 0

du 04 septembre 2015

Monsieur JEAN Jérémie
EGREEN
3 RUE DE VAUCOULEURS
75011 PARIS**A LIRE IMPERATIVEMENT**

La délivrance de ce récépissé atteste que vous avez transmis à la CNIL un dossier de déclaration formellement complet. Vous pouvez désormais mettre en oeuvre votre traitement de données à caractère personnel.

La CNIL peut à tout moment vérifier, par courrier, par la voie d'un contrôle sur place ou en ligne, que ce traitement respecte l'ensemble des dispositions de la loi du 6 janvier 1978 modifiée en 2004. Afin d'être conforme à la loi, vous êtes tenu de respecter tout au long de votre traitement les obligations prévues et notamment :

- 1) La définition et le respect de la finalité du traitement,
- 2) La pertinence des données traitées,
- 3) La conservation pendant une durée limitée des données,
- 4) La sécurité et la confidentialité des données,
- 5) Le respect des droits des intéressés : information sur leur droit d'accès, de rectification et d'opposition.

Pour plus de détails sur les obligations prévues par la loi « informatique et libertés », consultez le site internet de la CNIL : www.cnil.fr

Organisme déclarant**Nom :** EGREEN**Service :****Adresse :** 3 RUE DE VAUCOULEURS**Code postal :** 75011**Ville :** PARIS**N° SIREN ou SIRET :**

751465089 00017

Code NAF ou APE :

6201Z

Tél. : 33686804971**Fax. :****Traitement déclaré**

Finalité : SUIVI DES CONSOMMATIONS D'ELECTRICITE ET DE LA TEMPERATURE INTERIEURE DANS LE CADRE D'UN PROJET EUROPEEN APPELE GREENPLAY. CE PROJET VISE A SENSIBILISER AUX ECONOMIES D'ENERGIE A TRAVERS LE SUIVI DES CONSOMMATIONS ET UN JEU LUDIQUE MOTIVANT LES ECONOMIES D'ENERGIE. PRES DE 150 LOGEMENTS SERONT EQUIPES ET PARTICIPERONT A L'EXPERIMENTATION PENDANT UN AN ET DEMI.

Fait à Paris, le 04 septembre 2015
Par délégation de la commissionIsabelle FALQUE PIERROTIN
Présidente