BEYOND

Deliverable 6.3
BEYOND Data
Management Plan

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BEYOND

D6.3
BEYOND Data Management Plan

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BEYOND

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V0.1	10th September 2022	Initial version of the deliverable	Andreas Dubourg (FBR)
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V0.3	27th September 2022	Consortium Partnerl review	Peter Torstensen (ACC)
V1.0	30th September 2022	Final version of the deliverable	Andreas Dubourg (FBR)

BEYOND PROJECT

BEYOND aims to achieve a more interconnected European business acceleration industry in between 'modest' or 'moderate' and 'strong' or 'leading' acceleration ecosystems in Europe, and therefore directly contribute to foster the rise of investment flows from net contributor regions (leaders) towards 'modest' and 'moderate' regions as net beneficiaries, which might provide one effective solution against the above referred undesired geographical gap.

BEYOND project will focus on:

1. Testing a Self-Sovereign Digital Identity scheme (funding passport) that start-ups get no matter what accelerator they join. Through the funding passport start-ups can document their journey and get access to additional funding;
2. Building a joint platform for the core acceleration enabling online acceleration and a joint framework for how start-ups are most efficiently developed;
3. Sharing specific offers from the different project participants and resources to increase the value for start-ups;
4. Developing an incentive structure where all partners benefit from providing high quality start-ups and develop their services;
5. Creating a cross-region marketplace for raising funding to start-ups so start-ups are not as dependent on the local investor landscape.

These 5 elements constitute the backbone of BEYOND's Virtual Accelerator Marketplace (VAM) a trust framework to support joint business acceleration activities that will contribute in a sustainable manner to enhance a balanced interconnectedness of private investment flows and thus, contribute to dramatically improve quality and outreach of business acceleration services in developing innovation ecosystems. The VAM will be tested through 2 editions of a joint acceleration program co-designed by 5 business accelerators backed on their own VC Funds,

representing moderate (BG, LT, PL) and leading regions (DK, ES), that will select and support 2 cohorts of 20 Startups that will receive access to mentoring and VC investors.

Abbreviations

EU: European Union
VAM: Virtual Accelerator Marketplace
EIC: European Innovation Council
VC: Venture Capital
DoA: Description of Action
KPI: Key Performance Indicator
DMP: Data Management Plan
GDPR: General Data Protection Regulation
SSL: Secure Socket Layer
ACC: Accelerace
FBA: FundingBox Accelerator
ISDI: ISDI
OVK: Overkill Ventures
XLR: XL Radar
FBR: FundingBox Research

Executive Summary

The Data Management Plan (DMP) has been developed as per the project plan. The document will be updated for the duration of the project in compliance with the FAIR data principles (Findable, Accessible, Interoperable, Reusable), and the way in which data will be stored and preserved.

Specifically in BEYOND the type of data generated/collected during the project are:
(1) Personal data collected in BEYOND Virtual Platform (that consists of the applications - OnePass, BeyondBeta and Dealroom). (2) Content produced by users as part of their interaction with the online Community features. (3) Data gathered via forms, surveys, interviews or focus groups conducted during the Project; (4) Content produced by project partners as part of reports; (5). Content produced by project partners to manage, communicate, disseminate and coordinate project activities such as meeting minutes, meeting video records, communication and dissemination materials.

A large part of the data managed in the project will be data related to Startups participating in the Open Calls and Acceleration Programme. BEYOND collects data of both natural and legal persons through an online form within the OnePass platform. The consortium ensures confidentiality of the data included in the Application forms. The collected data will be protected according to the procedures for privacy and intellectual property rights defined in the consortium agreement.

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1 Introduction

The aim of a Data Management Plan (DMP) is to plan the life cycle of data within the BEYOND project. It offers a long-term perspective by outlining how data will be generated, collected, documented, shared, preserved and deleted within the project.

As described in the Guidelines on FAIR Data Management in Horizon Europe a Data Management Plan is a key element in ensuring that data is managed properly. To this end, it is necessary to identify the type of data that will be generated in the framework of the project.

Additionally, the Data Management Plan defined in M5 will be updated, if needed, during the project (e.g. due to the generation of new data or to reflect changes related to the original planning, changes in data/output access provisions or curation policies, changes in consortium practices (e.g. new innovation potential, decision to file for a patent), changes in consortium composition, etc.) and at the end of the project in any case. The DMP will include all aspects related to data lifecycle, which includes its organisation and curation, and adequate provisions for its access, preservation, sharing, and eventual deletion, both during and after a project, all in line with the FAIR principles ('Findability', 'Accessibility', 'Interoperability' and 'Reusability')

FBR will be responsible for Data Management and will produce a 'Data Management Plan [D.6.2]', describing the process in detail and considering data collected and stored in the background solutions used (namely OnePass, to manage Identity and Access to BEYOND Virtual Platform and its upgraded version, BEYOND VAM).

2 Data Summary

The type of data generated/collected during the project are:

(1). Personal data collected in the OnePass to facilitate access to the services offered in the BEYOND Virtual Platform as well as the data gathered in the BEYOND Virtual Platform;

(2) Content produced by users as part of their interaction with the online Community features.

(3) Data gathered via forms, surveys, interviews or focus groups conducted during the Project;

(4) Content produced by project partners as part of reports;

(5). Content produced by project partners to manage, communicate, disseminate and coordinate project activities such as meeting minutes, meeting video records, communication and dissemination materials.

Data will be managed with the utmost care and respect for the provisions of applicable regulations. In particular, the processing of personal data will take place on a legal basis pursuant to Art. 6 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 (General Data Protection Regulation, hereafter "GDPR") .

Project partners agree on maximising access and reuse of research data (anonymized statistics) generated by the project. If personal data is made accessible, it's shared only when an appropriate legal basis is ensured. In cases where it will be necessary to share the personal data resulting from the project, but it will not be necessary to make it available in a form that enables the identification of a natural person, personal data will be disclosed in a pseudonymised form. The collected data will be protected according to the procedures for privacy and intellectual property rights resulting from applicable laws, defined in the consortium agreement.

The data gathered to join and manage the BEYOND Virtual Platform will be treated as described in the OnePass Terms of Service (https://getonepass.eu/trust/terms) and according to the Privacy Policy (https://getonepass.eu/trust/privacy), which are aligned with the GDPR Regulation and updated on a regular basis depending on changes in law.

Carrying out tasks resulting from the Grant Agreement, FBA will set a BEYOND Community Space powered by FundingBox Spaces, with the aim of shaping an on-line space for keeping the conversation going with the project stakeholders. All operations on personal data performed within FundingBox Spaces will be held in accordance with the rules resulting from the GDPR, in line with the principles set out in the FundingBox Spaces Privacy Policy. Moreover, the FundingBox Spaces and Communities Specific Terms of Use together with General Terms of Service will find application. In general terms, all data gathered within the community will be exploited as follows:

(1). Storage: The platform to collect the data will provide a cloud-based environment located within EEA;

(2). Protection: Any databases containing data considered sensitive, or those that due to risk assessment require a higher degree of caution, will be secured using appropriate security measures;

(3). Retention: All personal data collected will be pseudonymised upon completion of the project and, in accordance to storage limitation principle resulting from art. 5.1.e) GDPR, will not be kept for longer than is necessary for the purposes for which the personal data are processed; In the case of data gathered for the online community, consortium partners might decide to continue running the community, transform it or close it. Personal data collected within the Community will be processed following the FundingBox Terms of Service and Privacy Policy applicable on the day of removal/transformation. Users that decide to abandon a given community are free to execute their rights related to the GDPR rules;

(4). Transfer: The exchange of data between partners will be handled by a secure server to ensure maximum security during transmission governed by the FundingBox Terms of Service and Privacy Policy. Each Community has its owner who is responsible for treatment of the data gathered within a given community. In any case it must follow GDPR regulations as well as ensure full transparency of how data are treated.

(5). Destruction: Data will be destroyed, deleted or anonymized when no longer needed according to the FundingBox. Terms of Service and Privacy Policy.

2.1 Expected BEYOND data

Through BEYOND's Virtual Accelerator Marketplace (VAM) a trust framework to support joint business acceleration activities will contribute in a sustainable manner to enhance a balanced interconnectedness of private investment flows in the acceleration ecosystem of Europe. The VAM will be tested through 2 editions of a joint acceleration program engaging with startups from all over Europe that will select and support 2 cohorts of 20 Startups that will receive access to mentoring and VC investors. All application, selection, mentoring/training and VC investor meetings will happen within the platform that consist of the interconnected applications OnePass, BeyondBeta and the Dealroom. The OnePass will act as Identity and Access Management Module for the beneficiaries where the first step is to fill in contact data and from here the user can create their single sign-on account which can be used throughout the BEYOND Virtual Platform, incl. BeyondBeta and Dealroom.

2.2 Versions and Updates

The Data Management Plan (DMP) has been developed as per the project plan. The document will be updated for the duration of the project in compliance with the FAIR data principles (Findable, Accessible, Interoperable, Reusable), and the way in which data will be stored and preserved. Such updates will occur due to:

- Significant changes in the project such as the availability of essentially new data sources orchanges due to the operations of Pilot Lines
- Changes in consortium policies
- Changes in consortium composition
- Any other reason that might be of relevance to the project

2.3 Data from Open Calls - Selection of the Participants

A large part of the data managed in the project will be data related to Startups participating in the Acceleration Programme. BEYOND collects data of both natural and legal persons through an online form within the OnePass platform (https://app.getonepass.eu/) which will be used to enable applicants to take part in the project. To apply applicants have to submit a form that requires them to provide personal data such as: applicant's full name, contact details, organization name and country of origin. The detailed scope of the collected data will be defined by partners within the project duration and elbaorated in detail in the updated DMP.

3 Fair Data

The aforementioned FAIR principles and processes described in this document, are aimed to ensure adequate data documentation from the beginning of the data production/collection. The project does not include the use of any pilots and the acceleration programs are based on the startups own solutions and no developement based on specific datasets provided by the consortium partners, some data might be created in the BeyondBeta academy based on beneficiaries participating in certain courses or using specific tools, though this data will only have limited availability for example mentors and consortium partners.

1) Findable

Project-internal storage, processing, and sharing of project data will mainly happen through the project's Google Drive and directly within the VAM, both protected from unauthorised access, the VAM additionally have the possibility of authorisation roles to limit access to some stakeholders. The transfer of project information by email will be limited to a strict minimum. Public project data will be mainly shared through the project website, social media and other dissemination activities.

BEYOND especially consider the naming, contents and structure of the different documents, so that they will be consistent with each other. We also emphasize the Project level rules and practices, e.g., where the different documents will be stored and the logical structure of the document folders. This relates to both the consortiums internal Google Drive for storing deliverables, documents, meeting minutes, recordings etc. and the structure of presenting public documents, results and deliverables on the project website.

The specific data created through OnePass or in the related applications of the VAM will be available in the platform. The structure here is already built in the platform, giving a proper overview and straightforward naming for the authorised people having access to the the given data.

2) Accessible

BEYOND is committed to make project outcomes publicly available.

No specific software tools will be needed to access the data, since pseudonymised or anonymised data sets will be saved and stored in open document and information formats where possible, facilitating its exploitation and guaranteeing their long-term accessibility.

3) Interoperable

The project partners will be responsible for storing all data in the appropriate format that will make data accessible to all professionals that might be interested in exploiting the data generated during the project. The generated data will be compatible with the needs of specific end users as proposed by Pagano et al[1].

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[1] P. Pagano, L. Candela, D. Castelli, "Data Interoperability", Data Science Journal, vol. 12, pp. GRDI19-GRDI25, 2013.

The language used in the project will be the one in common use within research and acceleration sectors, addressing the specific target audience of startups and their ecosystems. Vocabulary will not constitute a barrier for data interoperability and reuse.

4) Reusable

The collected data of BEYOND will be used only for analysis and development purposes related to the project and will be protected according to the procedures for privacy. Data related to the Open Calls will be made accessible once the final list of beneficiaries is published after each round. Other results such as the performance indicators of the accelerated projects will be published in agreement with the participantss when the acceleration programme reaches the end.

In order to ensure data quality assurance of personal data processing will be done in accordance with EU, national, and international laws considering the "data quality" principles listed below[2]:

- Data processing is adequate, relevant and non-excessive
- Accurate and kept up to date
- Processed fairly and lawfully
- Processed in line with the rights of data subjects
- Processed in a secure manner
- Kept for no longer that necessary and for the sole purpose of the project

The data quality assurance process will be in accordance with GDPR.

The consortium will maintain project data in a reusable state for as long as possible after the end of the project.

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[2] Wilms, G. Guide on Good Data Protection Practice in Research of the European University Institute. (March 2017). Retrieved from http://www.eui.eu/Documents/ServicesAdmin/DeanOfStudies/ResearchEthics/Guide-Data-Protection-Research.pdf.

4 Allocation of Resources

This section gives an overview of the main aspect in relation to costs and responsibilities:

Costs

- Costs for storage of data are included in the project costs.

Responsibilities

- The consortium project lead, being the coordinator, has the main responsibility to communicate the DMP to all project members.
- Each project member is responsible for implementing the DMP within their respective work packages (WP).
- The main data repository will be hosted as part of the BEYOND exclusive Google Drive. Thus, the GDrive host, Coordinator, manages the access rights to the data, and is monitoring and controlling access to the data repository.
- Each consortium member is solely responsible for the data the member processes.

Resources

- The project members responsible for the implementation of the DMP need to be identified.
- Data access plans, rights management and documentation for the main data repository has to be implemented by the project partner responsible for data management.

5 Data Security

Data security is the practice of protecting digital information from unauthorized access, corruption, or theft throughout its entire lifecycle. It's a concept that encompasses every aspect of information security from the physical security to administrative and access controls, as well as the logical security of software applications. It also includes organizational policies and procedures.

5.1 Storage and Backup

The VAM of BEYOND consists of the 3 applications OnePass, BeyondBeta and Dealroom, Each one serves a different purpose within the Beyond project lifecycle. Both the BeyondBeta Academy and the Dealroom can be accessed from within the OnePass application.

This means that ideally you start by entering and signing up through the OnePass Platform that is the Identity and Access Management module. This is done by creating a single-sign on account in OnePass that you can use for entering the other applications/modules where everything is linked so you can go back and forth between them using the same account and credentials.

OnePass

The OnePass platform will be used for the startup onboarding process. The startup can create a profile by following the onboarding wizard which guides them through a number of steps to capture the required information to create a basic profile. Once the basic profile is created, the startup can go directly to view available funding opportunities, or complete their profile, such as adding more information to the Organisation overview, adding the legal information, and fundraising profile. A specific application form for applying to BEYOND will be created in the OnePass, once the acceleration program is defined.

BeyondBeta Academy

Using the same single sign-on from OnePass, the entrepreneur is taken to the BeyondBeta application directly from within OnePass. Here the startup can complete the academy training courses and/or access different tools. Courses and tools can be updated to suit the entrepreneur.

Mentors are also accessing the BeyondBeta Academy application, where they will have an overall dashboard to either view the information of the startups mentored or access the startup management area to monitor the performances of the the startups in terms of completed tools and courses, team and other information. Any data created here will only be accessible to the assigned mentors and consortium partners of BEYOND.

Dealroom

The last application related to the BEYOND VAM and directly related to the BeyondBeta Academy and OnePass is the Dealroom, again this application is accessed directly form OnePass using the same account and credentials.

Within the dealroom application the startups sets up a specific new room (dealroom), once created both the startup and the accelerator/investor are invited to join the dealroom. Inside this specific secure and closed room, the proposal and negotiation starts, and when agreed, the due diligence is completed. The startup and the investor can securely share documents within the dealroom. Specific credentials associated with the due diligence process can be requested, issued and verified. Finally, Contracts can be securely signed.

Any type of payments happens outside of the dealroom, though follow-up and reporting can happen within the dealroom.

BEYOND collects data of natural and legal persons, through online forms within OnePass platform which are used during the project´s Open Calls. Data is deposited and secured in the FBOX platform. Regarding the deposit of data, associated metadata, documentation and code, projects are required to make their funded work publicly available under an open source license or as open research. As such, project data, metadata, documentation and code will already be publicly available

The Consortium deposits the consortium-wide management data and internal publications generated by the project in a limited GoogleDrive with access only to the consortium partners of BEYOND project, publicly available deliverables and publications will be presented in the projects website, not yet established. This will be the only central data repository for the BEYOND project, only authorized persons have access to this repository. If for a specific task there is a subject specific repository that is considered more relevant, then the chosen repository will be indicated in the updated versions of DMP. The organizations store their respective internal fiscal documents in their own systems along with other similar data from their organizations. For the purposes related to the performance of works under the BEYOND project, project partners may use their own IT tools, in particular clouds for data storage. However, it should be taken into account that each partner is responsible for ensuring an appropriate level of security measures.

The collected data will be protected according to the procedures for privacy and intellectual property rights defined in the consortium agreement. The same attention to data protection will be placed in publication and dissemination of data and analysis in order to maintain the correct balance between scientific explanation and personal data security.

5.2 Access and Security

FBOX strictly limits with whom it share personal data and who can access them. FBOX will makes data accessible to entities that ensure the proper functioning of the OnePass. These may be, in particular, vendors who provide FBOX with hosting or any other IT services. The list of our trusted processors can be found here: https://fundingbox.com/trust/processors/.

Either way, personal data are share only with verified suppliers who ensure an appropriate level of security.

FBOX applies technological and organisational means to secure personal data. FBOX implements security safeguards corresponding to the threats and category of data to be secured. In particular, FundingBox secures data against being published to unauthorised persons, being taken over by an unauthorised person, processed in violation of the law and changed, lost, damaged or destroyed. Among others, the SSL (Secure Socket Layer) certificates shall be applied. Your personal data is collected and stored on a secured server. Moreover, the data is secured by internal procedures of FundingBox related to processing of the personal data and information security policy.

In order to log in to the Account, data subjects have to provide relevant username and password. In order to ensure an appropriate level of security, the password for the Account exists in the OnePass only in a coded form. Furthermore, registration and logging into the OnePass takes place under a secure https connection. Communication between the User's device and servers is encoded using the SSL protocol.

FundingBox undertakes all necessary actions, so that our subcontractors and service providers guarantee appropriate security measures whenever they process personal data at the request of FundingBox.

The personal data collected during the project is processed in accordance to GDPR.
All the personal data is:

- processed lawfully, fairly and in a transparent manner in relation to the data subject ('lawfulness, fairness and transparency');
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes ('purpose limitation');
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed ('storage limitation');
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

All the personal and legal data is processed with the appropriate technical and organizational measures under art. 32 of the GDPR or other generally applicable laws. BEYOND collects data of natural and legal persons, through an online form within OnePass Platform which are used during the project´s Open Calls and other administration processes managed by FundingBox. The information is captured through online forms and is recorded and stored in FundingBox infrastructure.

Each Consortium Partner is a separate data controller. Data controllers are responsible for implementing appropriate technical and organisational measures to ensure and to demonstrate that their processing activities are compliant with the requirements of the GDPR. The data controllers are responsible for, and must be able to demonstrate, compliance with the data protection principles.

If the Coordinator and/or Consortium Partners wish to entrust processing of personal data to a processor, they shall ensure the appropriate legal basis. Entrusting processing should be constituted in a Data Processing Agreement. For this purpose it is recommended to use Standard Contractual Clauses provided by European Commission in the following decisions: https://eur-lex.europa.eu/eli/dec_impl/2021/914/oj and https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021D091

6 Ethical Aspects

According to Art 14.1 in the BEYOND GA, any action must be carried out in line with the highest ethical standards and the applicable EU, international and national law on ethical principles.

BEYOND is a Coordination and Support Action which seeks to achieve a more interconnected European business acceleration industry in between developing and leading acceleration ecosystems in Europe, and therefore directly contribute to foster the rise of investment flows throughout the different acceleration ecosystems, as described in Annex 1 of the GA.

BEYOND has also created an On-line Community aimed to foster networking among the involved stakeholders.

BEYOND, therefore, deals with ethics issues related to 'Protection of Data' because:

the projects collects general data of natural and/or legal persons, submitting a proposal to the BeYOND Open Calls through an online form in FundingBox's OnePass as part of the VAM platform, to select the third parties (Startups) that will participate in the Joint Acceleration Programme, receiving mentoring and access to investors through the dealroom. Data is collected during the application process only for the purpose of emerging the most promising third party projects. The personal data collected are i.e. data of the applicant (name and surname), contact data and data of the team members that will be engaged in the execution of the proposal (like their professional experience) and data that are necessary to assess the potential of the proposal. An applicant will be free to decide to what extent to provide those data (except contact details). Further data might be collected to the extent necessary to properly implement the applicant project. BEYOND does not plan to collect any sensitive data.

The same will be applied regarding the Personal Data gathered for the users' registration in the BEYOND Community.

7 Other

7.1 IPR and Copyrights

Taking in account the CSA nature of this project and the established KERs, the type of results foreseen, in the shape of IP subjects such as: datasets; original content; legal schemes; on-line marketplace; and visual identity; will be subjects of protection under Copyright, Trademark and confidential information.

Besides, the main result of the project, the Virtual Accelerator Marketplace, will be backed into already existing digital assets and brands subjected to IPR in the form of copyright and trademark that will shape the background IP needed for project implementation. Therefore, for the success of the project it is essential that all BEYOND project partners agree on explicit rules concerning IP ownership, access rights to any Background and Results for the execution of the project and the protection of intellectual property rights (IPRs) and confidential information.

Such issues are addressed in detail within the Consortium Agreement between all project partners and establishes a legal framework for the project in order to provide clear regulations for issues within the consortium related to the work, IP-Ownership, Access Rights to Background and Results and any other matters of the consortium's interest.

Thereby, in order to ensure a smooth execution of the project, in the Consortium Agreement the project partners have granted each other and their affiliated companies, royalty-free Access Rights to their Background and Results for the execution of the project. This allows the partners the ability to execute the project to the best of their ability, without being hindered by administrative issues.

The Consortium Agreement defines further details concerning the Access Rights for Exploitation to Background and Results. Regarding the IP ownership of results achieved during project implementation, such results shall be owned by the project partner carrying out the work leading to such Results. If any Results are created jointly by at least two project partners and it is not possible to distinguish between the contributions of each of the project partners, such results will be jointly owned by the contributing project partners.

Further details concerning jointly owned Results, are addressed in the Consortium Agreement.

Last but not least, the marketplace nature of the main result of the project will open the results of the project to participation of third parties that might become adopters of such marketplace solution, being as such, potential holders of IP rights in the form of copyrights, trademarks or confidential information that might become part of their offerings in such marketplace. Such issues related with third parties that may become adopters of the marketplace, will be addressed in detail within the enforceable legal scheme and related business model that will shape the terms of use and exploitation of such marketplace and, that will be developed as part of the work planned in T.5.1 sustainability strategy.

7.2 Public Funding Disclaimer

All data produced within the framework of the project will inform of the funding source by adding the following disclaimer and EU flag: