



# DELPHI

**FeDerated nEtwork of pLatforms for PAssenger and  
freighT Intermodality**

**Grant Agreement Number: 101104263**

## D.1.4: Ethics, Fundamental Rights, Data and Privacy Issues

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## Document Information

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## Executive Summary

DELPHI project is committed to being carried out in line with the highest ethical standards and the applicable EU, international and national law on ethical principles. To this end, the deliverable at hand is intended to set the ethical and legal framework the project should abide by, as well as to lay down the practices all partners need to follow in order to achieve this.

The ethical and legal framework pertaining to the project, as identified, consists of several laws, regulations, codes and guidelines, briefly presented in titles below:

- Fundamental Rights
- GDPR and Data Privacy
- e-Privacy Regulation
- Free Flow of Non-Personal Data Regulation
- Platform-to-Business Regulation
- Guidelines for Trustworthy AI
- Code of Conduct for Research Integrity
- Gender Equality
- European Data Governance Act and Data Sovereignty
- Social Science and Humanities approach
- Fair Competition

Furthermore, the role of the Data Management Plan (DMP) as a tool towards ethical and legal compliance is set forth. The Ethics Review Committee (ERC) is established to oversee the ethical aspects of DELPHI and ensure that all project-related activities, including pilots involving human participants, adhere to the legal and ethical standards put forward.

In addition, various practices concerning data handling in the project, towards ethical compliance, are outlined, referring to the following:

- Data Protection by Design and Default
- Pseudonymization and Anonymization
- Free and Informed Consent to Data Processing
- Use of Previously Collected Data (“secondary use”)
- Data Security
- Profiling, Tracking, Surveillance, Automated decision-making and Big Data
- Transfer of Personal Data to non-EU countries
- Deletion and Archiving of Data

Finally, based on this framework, an initial set of potential legal and ethical risks in the context of the project scope is compiled, to be updated throughout the project lifecycle

and handled accordingly based on the practices and measures laid out in this document.

*Not officially approved by the EC*