

Justice Programme &

Rights, Equality and Citizenship Programme

**Progress Report**

**Version 0.1**

**01 August 2019**

**PROGRESS REPORT**

** This is the template for beneficiaries’ progress reports which are not linked to payments.**

* **Instructions and footnotes in green will not appear in the text generated by the IT system/should be deleted from the word file.**
* **For options *[*in square brackets*]*: the option that applies must be chosen in the IT system/word file. Options not chosen will automatically either not appear or appear as ‘not applicable’/should be deleted from the word file**
* **For fields in [grey in square brackets] (even if they are part of an option as specified in the previous item): enter the appropriate data in the IT system/word file.**

**This template is not IT-supported. It must be downloaded by the beneficiaries and uploaded as deliverable on PP Continuous Reporting (SyGMa Deliverables screen).**

**IMPORTANT NOTICE**

**What is a progress report?**

Progress reports are deliverables which are sometimes requested at mid-term (or other crucial points in the project) if there is a long time-span without reporting.

The report must be prepared (by all beneficiaries together) in WORD format and uploaded as a PDF document on the PP Continuous Reporting (SyGMa Deliverables screen). The template to use is available either on the SyGMa Deliverables screen (via the help button) or in the Participant Portal Reference Documents.

 Progress report should NOT be confused with periodic reports. Periodic reports are linked to payments, progress reports are not.

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| logo_ec_17_colors_300dpi | EUROPEAN COMMISSION  Directorate-General Justice and Consumers  [**JUST O.4 – Programme and financial management** |

**Justice Programme &**

**Rights, Equality and Citizenship Programme**

# PROGRESS REPORT

## COVER PAGE

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| **PROJECT** | |
| **Project number:** | 814775 |
| **Title:** | SupporT small And medium enterprises on the data protection Reform II |
| **Acronym:** | STAR II |
| **Coordinator contact:** | Dr Attila Péterfalvi, NAIH |
| **Starting date:** | 01/08/2018 |
| **Duration:** | 24 months |
| **Amendments:** | not applicable |
| **Project website:** | [website address] |

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| **PERIOD COVERED**  cid:image001.png@01D0B99B.7C10A740 *Please note that this is only a progress report. The information in this report must also be included in the next periodic report/final report.* | |
| **Period (from last periodic report)**: | from 01/08/2018 to 31/07/2019 |

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## 1. DELIVERABLES, MILESTONES & CRITICAL RISKS

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| **Deliverables, milestones & critical risks** | **YES/NO** |
| We confirm that we updated the following PP/SyGMa Continuous Reporting screens:   * Deliverables * Milestones * Critical risks | YES |

## 

## 2. OVERVIEW OF THE PROGRESS & ACTIVITIES

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| **WORK PACKAGES** |

### *Work package 1*

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| **Work package 1: Project management & coordination** | | | |
| **Activities**  *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* | | | |
| Task number  (numbering Annex 1 GA) | Task name | Implemented?  (Yes/No/Partially) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| T1.1 | Launch of the action (kick-off meeting) [M1] | Yes | NAIH organised the kick-off meeting of the STAR II project, which took place at their premises in Budapest on Monday, 10 September 2018. The meeting brought together the project consortium members, to discuss in detail the execution of the STAR II project, actions leading to the first deliverables as well as the European Commission’s expectations and any administrative details. |
| T1.2 | Project coordination [M1-M24] | Partially | This is an ongoing task from the beginning until the conclusion of the project. NAIH has provided coordination, management and administration of STAR II during the first year of the project. NAIH has monitored and supervised the work progress; maintained the project implementation plan and liaised with relevant contacts among partners and the European Commission.  An effective communication and flow of information among partners has been ensured through regular contacts via email and Skype. Project documents are also shared by using the secure local servers of VUB through the OwnCloud software. Online consortium meetings are held on a regular basis. Skype conference calls for project coordination and management were organised on the following days:  - 19 November 2018  - 17 January 2019  - 5 April 2019  - 2 May 2019  - 6 June 2019  - 25 July 2019  There are written notes from each coordination meeting. These notes will be put in form in a separate deliverable (D1.3) which is due in M24. During the reporting period, the coordinator participated on the kick-off meeting of projects selected following call for proposals REC-RDAT-TRAI-AG-2017 on 03 December 2018 in Brussels, organised by the DG JUST. |
| T1.3 | Financial Management [M1-M24] | Partially | This is an ongoing task from the beginning until the conclusion of the project. NAIH has been in charge of the financial administration and management of the STAR II project. Likewise, in 2018-2019 NAIH ensured the financial management of the budget of STAR II and distributed the payments among the project partners. |
| T1.4 | External Advisory Board [M4-M24] | Yes | After the consortium compiled a list of suggested members, NAIH has initiated communication with potential members of the External Advisory Board in October 2018. The candidates accepted the request and a formal welcome letter was sent them via e-mail in November 2018, and the fully operational External Advisory Board (EAB) was established with five members. |
| Other issues  *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | | None. | |
| **Milestones & deliverables**  *Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.*  *Ensure consistency with the SyGMa Milestones and Deliverables screens.* | | | |
| Milestone number  (numbering SygMa) | Milestone name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS1 | Kick-off meeting [M1] | Yes | For organizational reasons (August would not have been suitable for most of the people involved in the project) the project partners agreed to hold the Kick-off meeting on 10 September 2018 in Budapest. The meeting brought together the project consortium members, to discuss in detail the execution of the STAR II project, actions leading to the first deliverables as well as the European Commission’s expectations and any administrative details. |
| MS2 | External Advisory Board [M4] | Yes | After the consortium compiled a list of suggested members, NAIH has initiated communication with potential members of the External Advisory Board in October 2018. The candidates accepted the request and a formal welcome letter was sent them via e-mail in November 2018, and the fully operational External Advisory Board (EAB) was established with five members. |
| Deliverable number  (numbering SyGMa) | Deliverable name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D1.1 | Kick-off meeting | Yes | Submission deadline: 31 August 2018  Submitted: 30 September 2018  Lead Beneficiary: NAIH  Gábor Kulitsán, Deliverable D1.1 Minutes from the kick-off meeting  For organizational reasons (August would not have been suitable for most of the people involved in the project) the project partners agreed to hold the Kick-off meeting on 10 September 2018 in Budapest.  Deliverable D1.1 contains the minutes of the STAR II kick-off meeting, held on Monday, 10 September 2018 in Budapest. |
| D1.2 | Progress report | Yes | Submission deadline: 31 August 2019  Submitted: 31 August 2019  Lead Beneficiary: NAIH  Deliverable D1.2 Progress report. Present deliverable constitutes the progress report, written by the consortium partners and submitted by the project coordinator, NAIH. |
| D1.3 | Coordination meetings | No | Submission deadline: 31 July 2020  There are written notes from each coordination meeting held so far. These notes will be put in form in a separate deliverable (D1.3) which is due in M24. |
| D1.4 | Composition of Advisory Board | Yes | Submission deadline: 30 November 2018  Submitted: 31 December 2018  Lead Beneficiary: NAIH  Renáta Nagy, Deliverable D1.4 Composition of Advisory Board  The deliverable describes how the STAR II External Advisory Board was established and who its members are. |
| D1.5 | Final, wrap-up meeting | No | Submission deadline: 30 June 2020 |
| Other issues | | None. | |

### *Work package 2*

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| **Work package 2: State-of-the-art** | | | |
| **Activities**  *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* | | | |
| Task number  (numbering Annex 1 GA) | Task name | Implemented?  (Yes/No/Partially) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| T2.1 | DPA’s efforts to raise awareness among SMEs [M1-M6} | Yes | TRI IE developed appropriate interview questions to meet the project's information needs, then designed interview templates, validated these with the consortium and revised them accordingly. TRI also produced methodological guidance for the project's interviewers.  NAIH conducted interviews with 7 EU DPAs (out of a total of 8)  TRI IE conducted interviews with ??? EU DPAs (out of a total of 14)  VUB conducted interviews with ??? EU DPAs (out of a total of 6) |
| T2.2 | SME’s experience with the GDPR [M1-M6] | Yes | TRI IE developed appropriate interview questions and prepared an online survey to meet the project's information needs, then designed interview templates, validated these with the consortium and revised them accordingly.  NAIH contacted the members of the Advisory Board and asked them to share the link of the online survey through the communication channels they have at their disposal (e.g. mailing lists, social media, SME associations contacts they have).  TRI IE & VUB please detail how many interviews you have conducted |
| T2.3 | Validation Workshop (W1; Dublin) [M7] | Yes | TRI IE organised the first validation workshop which was held on 24 June 2019 in Dublin. |
| Other issues  *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | | WP2 extension requests: NAIH contacted the PO three times to ask for extension of WP2:  1. On 02.10.2018 we asked the PO whether the deadline for workstream 2 of STAR II could be extended from February to April 2019. Reasons:  - TRI IE would like to ramp up more their Irish office in preparation for the validation workshop at the end of WS2, which they are hosting.  - They also want to assure an adequate venue for the workshop.  - Their intention is to adhere as closely as possible to the current deadlines for the written deliverables (D2.1 and D2.2) and preferably to have substantial drafts of these deliverables available at that point (given how they are needed to feed into WS3 and WS4).  - A side-benefit of this change is that the consortium could include some promotion of the hotline at the Validation workshop in Dublin, and increase its international character.  On 03.10.2018 the PO informed us that there is no problem in granting two more months for WP2 and its related deliverables. Although delivery dates of deliverables and work packages can only be changed by means of an amendment, but according to the PO in this case it is not necessary.  2. On 25 February 2019 we requested a further two-months-extension to completion of WP2. Reasons:  - TRI IE has had an informal contact with the Irish Data Protection Commission about their sponsoring the workshop, which was agreed, for maximising impact. However, two written follow-up e-mails have yielded no confirmation. TRI IE suspects that the GDPR is impacting their resource flexibility. TRI IE continues to pursue the DPC. If that option proves fruitless, additional internal resources will be brought together at TRI IE to provide a GDPR "clinic" for SMEs as part of the workshop which will increase participation, and provide valuable input into the WP2 research on the real needs of SMEs, but doing so will also take more time to organise.  - TRI IE has had contact with various SME associations as foreseen in the DoA; however, they have not yielded much in the way of interview material and TRI IE is planning a new set of interviews with a cross-section of SMEs to compensate for their interests in the SME associations, supported by an additional survey instrument. TRI IE aims to complete a plan for interview alternatives by early March and to restart the interview process by mid-March, but they do not believe there is enough time to complete the interviews before the envisaged workshop. Hence, TRI IE and the consortium need more time for the interviews.  - It is in the best interests of the project to produce excellent results with a two-month delay rather than patchy results according to the schedule. TRI IE will continue to provide the consortium with their interim findings as the work progresses and ensure that this delay does not impact subsequent deadlines or deliverables.  On 04 March 2019 the PO informed us that the extension request has been accepted and no formal amendment is needed. With the acceptance only the WP2 submission delay has been prolonged (until 30 June 2019). All other / consequent deadlines for submissions or the project end date are not prolonged.  3. On 21 June 2019 we requested a further two-weeks-extension to completion of WP2. On 25 June 2019 the PO informed us that our request has been accepted under the same conditions as specified in her reply of March 4th 2019. So, the final deadline to submit deliverables D2.1, D2.2 and D2.3 is 14 July 2019. | |
| **Milestones & deliverables**  *Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.*  *Ensure consistency with the SyGMa Milestones and Deliverables screens.* | | | |
| Milestone number  (numbering SyGMa) | Milestone name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS3 | First validation workshop [M7] | Yes | The workshop, organised by TRI IE, was held on 24 June 2019 in Dublin.  Just under 100 invitations were sent out to individuals to attend the validation workshop. All persons from DPAs and SME Associations who were either interviewed or who responded to the questionnaire which formed the research data for Deliverables D2.1 and D2.2. were invited to attend the validation workshop. This did not include SMEs that responded to the online survey. In addition, all members of the STAR II advisory board were invited.  Beyond these invitees, invitations targeted the Irish Data Protection Commission and SME associations based in the Dublin area. These invitees were identified by using Trilateral Research Ltd.’s mailing list, online research and field referrals.  In total, including the facilitators, fourteen people attended the workshop including three persons from a data protection authority, five from business associations (SME or sector specific), two DPO specialists, three researchers and one GDPR consultant. Out of these fourteen: seven participants were predominantly focused on the SME context in Ireland; two on Hungary; and five on the EU wide context. |
| Deliverable number  (numbering SyGMa) | Deliverable name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D2.1 | DPA’s efforts to raise awareness among SME’s | Yes | Submission deadline (original): 31 January 2019  Submission deadline (extended): 14 July 2019  Submitted: 14 July 2019  Lead Beneficiary: TRI IE  Leanne Cochrane, Dr David Barnard-Willis, Dr Filippo Marchetti, Kai Matturi; Deliverable D2.1 Report on DPA efforts to raise awareness among SMEs on the GDPR.  The report presents the findings from a research study into awareness-raising efforts by EU data protection authorities (DPAs) among small and medium enterprises (SMEs) about the General Data Protection Regulation (GDPR). The project team conducted interviews with and received questionnaires from a total of 18 DPAs to establish the state-of-the-art in this area. |
| D2.2 | SME’s experience with the GDPR | Yes | Submission deadline (original): 31 January 2019  Submission deadline (extended): 14 July 2019  Submitted: 14 July 2019  Lead Beneficiary: TRI IE  Dr David Barnard-Willis, Leanne Cochrane, Kai Matturi, Dr Filippo Marchetti; Deliverable D2.2 Report on the SME experience of the GDPR  The report presents the findings from a multi-method research study into the experiences of small and medium enterprises (SMEs) with the General Data Protection Regulation (GDPR). The project team conducted interviews with SME associations, an online survey of EU SMEs and face-to-face interviews with SMEs. The intent of the study was to understand what SMEs had done and were doing in relation to the GDPR, where they were getting information and support, what challenges they were facing, and what actions from data protection authorities and others would be helpful for them. |
| D2.3 | A report from the first Validation Workshop (Dublin) | Yes | Submission deadline (original): 28 February 2019  Submission deadline (extended): 14 July 2019  Submitted: 14 July 2019  Lead Beneficiary: TRI IE  Leanne Cochrane, Dr David Barnard-Willis, Dr Filippo Marchetti, Kai Matturi; Deliverable D2.3 Report on WP2 Validation workshop  The report documents a validation workshop for the preliminary results of the STAR II research project, held in Dublin in June 2019. The workshop was intended to present, check, and validate the findings of two studies conducted by the STAR II project:   * A review of the state-of-the-art in Data Protection Authorities (DPAs) awareness-raising concerning the General Data Protection Regulation (GDPR) among small and medium enterprises (SMEs) (Presented in Deliverable D2.1), and * Research into the experiences of the GDPR of small and medium enterprises (SMEs) (presented in Deliverable D2.2).   To this end, the workshop included presentations of these results, contextual mapping exercises, general discussion with participations and presentations by two DPAs. During discussions, the main findings were confirmed and some additional input was generated. |
| Other issues | | See “other issues” under the WP2 activities. | |

### *Work package 3*

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| **Work package 3: Hotline & awareness-raising campaign for SMEs** | | | |
| **Activities**  *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* | | | |
| Task number  (numbering Annex 1 GA) | Task name | Implemented?  (Yes/No/Partially) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| T3.1 | Establish the awareness-raising campaign [M4-M8] | Yes | The communication channel (radio), the length of the campaign (one month), the frequency of broadcasting (two plus one spots per day) were based on the experience gained in the ARCADES project. A one-month-long campaign with three spots (50 seconds) per day was deemed to be appropriate to deliver the message for a significant number of people, including the target audience.  NAIH requested quotes from the Hungarian Media Service Support and Trust Fund (MTVA) on the expected costs of the recording and one-month-long broadcast, and later a contract has been signed.  NAIH drafted the text and the scenarios of the radio campaign in English and in Hungarian and then validated them with the consortium. The final text and the scenarios of the radio spot was recorded in Hungarian language on 20.12.2018. The following text was recorded:  “Do you know that small and medium-sized enterprises represent 99% of all businesses in the EU?  Rules and obligations of the new EU data protection regulation (coming into force as of May 2018) affect generally these data controllers, too and there are also some specific rules of the GDPR which apply to SMEs.  For more information please, contact the National Authority for Data Protection and Freedom of Information, which has set up a special hotline: [kkvhotline@naih.hu](mailto:kkvhotline@naih.hu)  This PSA has been prepared upon the request of NAIH and co-financed by the Rights, Equality and Citizenship Programme of the European Union under the supervision of the DG JUST of the Commission.” |
| T3.2 | Run the awareness-raising campaign [M8-M10] | Yes | The radio campaign was broadcasted by Petőfi Rádió, a countrywide available public radio that has the most listeners per day among the entire adult population in Hungary. According to the data published by the National Media and Infocommunications Authority, Petőfi Rádió has had about 1,3 million listeners per day in average in the first quarter of 2019. The radio spot was broadcasted 86 times between 15.03.2019 – 15.04.2019 (17 times in the morning hours, 37 times in the afternoon hours and 32 times in the evening hours). |
| T3.3 | Establish the trial-hotline [M7-M8] | Yes | Infrastructure and necessary workforce (hotline administrator, hotline expert, DP expert responsible for the “Knowledge Base”, professional supervisor) is provided by NAIH.  NAIH created a “Knowledge Base” before the trial-hotline started its operation. This “Knowledge Base” is constantly expanding based on the incoming questions and the answers given to them.  NAIH drafted the privacy policy and the internal rules for the operation of the hotline (including deadlines, conditions of assistance, liability issues). After the documents have been reviewed by TRI IE and VUB, they were finalised. |
| T3.4 | Operate the hotline [M9-M20] | Partially | This is an ongoing task. The hotline is operated by NAIH, SMEs can send their questions to [kkvhotline@naih.hu](mailto:kkvhotline@naih.hu).  NAIH has experienced a great interest among the SMEs during the hotline’s operation so far.The majority of the SMEs contacting NAIH via the hotline refers to the information availableon the website of the Authority, a smaller part refers to the radio campaign. Based on theincreased interest of the SMEs on their GDPR compliance, the awareness raising campaign hassuccessfully reached its goal. |
| T3.5 | Conduct a statistical analysis of the questions raised by SMEs [M9-M20] | Partially | This is an ongoing task. As the hotline is operated by NAIH, information and statistics on the questions raised by SMEs is also collected by NAIH. There is now enough data to analyse, thus NAIH will provide the related excel sheet to TRI IE and VUB in order to make a qualitative and quantitative evaluation of the hotline. |
| T3.6 | Validation workshop (W2; Brussels) [M21] | No | Workshops W2 and W3 are merged, there will be only one workshop in Brussels in the period between December 2019 [M17] and April 2020 [M21]. For further details see “other issues”. |
| Other issues  *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | | During the Kick-off meeting the Partners discussed that W2 and W3 (and consequently D3.4 and D4.2) could be joined and instead of two workshops and deliverables the consortium would organise one workshop and would submit one deliverable in the period between December 2019 and April 2020. The Partners have come to this possible solution because work package 3 (Hotline & awareness-raising campaign for SMEs) and work package 4  (Guidance for DPAs & handbook for SMEs) are strongly interconnected and by joining two workshops we could release some financial resources and optimize the travel costs available for Partners during the project.  After the Kick-off meeting NAIH as project coordinator contacted the Project Officer (PO) through the Participant Portal (PP) and asked her whether it is possible to join workshops W2 and W3. On 12 September 2018 the PO confirmed that it is possible to group the two workshops. She also informed the coordinator that normally, all changes to deliverables need formal amendment, but in this case there would be a possibility to upload in December 2019 a paper under D4.2 saying that in agreement with the PO the deliverable is merged with D3.4. The PO would then approve this deliverable and then between December 2019 and April 2020 all the related documents of the merged D3.4 and D4.2 must be uploaded. | |
| **Milestones & deliverables**  *Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.*  *Ensure consistency with the SyGMa Milestones and Deliverables screens.* | | | |
| Milestone number  (numbering SyGMa) | Milestone name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS4 | Launch of the awareness-raising campaign [M7] | Yes | See justification of task T3.1 and T3.2 |
| MS5 | Launch of the hotline for SMEs [M7] | Yes | The President and other representatives of NAIH presented the project and the launch of the SME hotline on several conferences (Hungarian Decision maker Think Tank Conference, Infoszféra conference, Data Protection Case Handling Workshop). To further advertise the STAR II project and the SME hotline, NAIH published an announcement on its website on the launch and operation of the SME hotline on 14.03.2019.  The required operating time of the hotline is 12 months. As the hotline started its operation on 15 March 2019, it will be definitely operated until 15 March 2020, but if it proves successful and there will be a demand for it, NAIH will maintain this communication channel. |
| Deliverable number  (numbering SyGMa) | Deliverable name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D3.1 | Report on the awareness-raising campaign | Yes | Submission deadline: 31 May 2019  Submitted: 31 May 2019  Lead Beneficiary: NAIH  Renáta Nagy; Deliverable D3.1 Report on the awareness raising campaign  The report describes the aim and the establishment of the awareness raising campaign, contains information on the recording and broadcasting of the radio spot and the experience of the effectiveness of the campaign.  The campaign aimed to reach out to SMEs to raise their awareness regarding the GDPR and to draw more attention to the new regulatory framework on personal data protection. The campaign also explained the particular forms of assistance STAR II will provide, namely the trial hotline for SMEs in the first place, and – subsequently – the handbook for SMEs and a guidance for DPAs. The campaign reached out the target group widely and has risen the awareness of the SMEs in Hungary about the need to comply with the new data protection framework and encouraged them to take the necessary measures. |
| D3.2 | Report on the hotline | No | Submission deadline: 31 March 2020 |
| D3.3 | Report on the statistics and efficiency of the hotline | No | Submission deadline: 31 March 2020 |
| D3.4 | Second Validation workshop (Brussels) | No | Submission deadline: 30 April 2020  Workshops W2 and W3 are merged, there will be only one workshop in Brussels in the period between December 2019 [M17] and April 2020 [M21]. For further details see “other issues”. |
| Other issues | | See “other issues” under WP3 activities | |

### *Work package 4*

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| **Work package 4: Guidance for DPAs & handbook for SMEs** | | | |
| **Activities**  *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* | | | |
| Task number  (numbering Annex 1 GA) | Task name | Implemented?  (Yes/No/Partially) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| T4.1 | Draft versions of the guidance & handbook [M13-16] | No | The Partners have already started a discussion on the guidance & handbook. Present state:   * The agreed best idea for the handbook is a risk assessment tool. * The guidance will include information on how to operate a hotline and communication with SMEs generally, i.e. will build on findings in WP2 as well as NAIH’s hotline experience. |
| T4.2 | Validation workshop (W3; Dublin) [M17] | No | Workshops W2 and W3 are merged, there will be only one workshop in Brussels in the period between December 2019 [M17] and April 2020 [M21]. For further details see “other issues” under WP3 activities. |
| T4.3 | Final versions of the guidance & handbook [M17-M22] | No | The activity has not started yet. |
| T4.4 | Launch event for the guidance & handbook (W4; Budapest) [M23] | No | The activity has not started yet. |
| Other issues  *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | | None. | |
| **Milestones & deliverables**  *Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.*  *Ensure consistency with the SyGMa Milestones and Deliverables screens.* | | | |
| Milestone number  (numbering SyGMa) | Milestone name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| MS6 | Validation of the draft guidance & handbook [M17] | No. | The respective activity has not started yet. |
| MS7 | Printed handbook and digital guidance [M24] | No | The respective activity has not started yet. |
| Deliverable number  (numbering SyGMa) | Deliverable name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D4.1 | Draft versions of the guidance & handbook | No | The respective activity has not started yet. |
| D4.2 | Third validation Workshop (Dublin) | No | Workshops W2 and W3 are merged, there will be only one workshop in Brussels in the period between December 2019 [M17] and April 2020 [M21]. For further details see “other issues” under WP3 activities. |
| D4.3 | Finalised guidance & handbook | No | The respective activity has not started yet. |
| D4.4 | Launch event for the guidance & handbook | No | The respective activity has not started yet. |
| Other issues | | None. | |

### *Work package 5*

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| **Work package 5: Dissemination and outreach** | | | |
| **Activities**  *Report on the implementation status of the activities that were to be implemented during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.* | | | |
| Task number  (numbering Annex 1 GA) | Task name | Implemented?  (Yes/No/Partially) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate how you intend to handle the situation and new timing; indicate if it was a one-off issue or how you intend to avoid similar issues in the future) |
| T5.1 | Create and keep up to date the project communication tools [M1-M24] | Partially | This activity was broken into sub-activities T5.1.1, T5.1.2 and T5.1.3 (see below for details) |
| T5.1.1 | Create and expand the project’s website [M1-M24] | Partially | This is an ongoing task.  During the Kick-off meeting partners agreed that the existing website of the STAR project (<http://www.project-star.eu/>) will be used, but it needs to be re-constructed to clearly separate information on and materials of STAR I and STAR II. |
| T5.1.2 | Maintain the project’s communication tools (social media accounts) [M1-M24] | Partially | This is an ongoing task.  During the Kick-off meeting partners agreed that social media accounts from the STAR I project will be retained for STAR II at all platforms deemed necessary and adjusted accordingly; based upon previous experience, LinkedIn, Twitter and Research Gate are the prime targets. |
| T5.1.3 | Bi-monthly newsletter [M7-M24] | Partially | This is an ongoing task.  The first newsletter (The announcement of the President of NAIH on the launch of the STAR project) was published by the Budapest Chamber of Commerce and Industry on 28.09.2018 and also by several local chambers in Hungary since then.  The second newsletter on the first validation workshop in Dublin was circulated within the members of the Hungarian Chamber of Commerce and Industry.  The third newsletter on the first experiences of the operation of the SME hotline has been drafted and circulated recently. |
| T5.2 | Journal articles and trade press articles [M21-M24] | No | The activity has not started yet. |
| T5.3 | Distribution of the guidance and handbook among EU DPAs, SMEs and other stakeholders [M22-M24] | No | The activity has not started yet. |
| Other issues  *Mention and explain unforeseen events and adjustments that had to be made. Explain impact on other tasks, available resources and planning.* | | According to WP5 description VUB is responsible for the communication tools, including the website and social media. In the description of work it is specified that the consortium will use the same tools used in the STAR project.  Upon request of VUB, on 25 July 2019, NAIH as coordinator contacted the PO asking her that taking into account the comments received on the current version of the STAR-website and limited skills to prepare a website that would be visually appealing and user friendly, would it be possibly to work with an entity that would be able to develop such a website. The initial estimate is around 1500 EUR, taking VAT into consideration.  On 26 July 2019 the PO informed that coordinator that they can agree with the proposed request, however, as the grant agreement total budget cannot be modified, we will need to find available funds from our savings and shift the budget accordingly between the budget headings, keeping in mind the 20% threshold rule between the budget heading shifts. If necessary, a formal amendment have to be introduced. | |
| **Milestones & deliverables**  *Report on the implementation status of the milestones and deliverables that were due during the period and explain deviations from the description of the action (DoA) in Annex 1 GA.*  *Ensure consistency with the SyGMa Milestones and Deliverables screens.* | | | |
| Deliverable number  (numbering SyGMa) | Deliverable name | Achieved?  (Yes/No) | Justification  (explain what was done and by whom; explain what was not done and why not; indicate new timing) |
| D5.1 | Star II on-line communication tools (website, social media accounts) | No | Submission deadline: 31 July 2020 |
| D5.2 | Journal article | No | Submission deadline: 31 July 2020 |
| D5.3 | Press releases | No | Submission deadline: 31 July 2020 |
| D5.4 | Trade press articles | No | Submission deadline: 31 March 2020 |
| D5.5 | Bi-monthly newsletters | No | Submission deadline: 31 July 2020 |
| Other issues | | None. | |

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| **Timetable**  *Report on deviations from the description of the action (DoA) in Annex 1 GA.*  *Fill in the planned implementation in beige and the deviations in red. Repeat lines/columns as necessary.* | | | | | | | | | | | | | | | | | | | | | | | | |
| **ACTIVITY** | **MONTHS** | | | | | | | | | | | | | | | | | | | | | | | |
| **M 1** | **M 2** | **M 3** | **M 4** | **M 5** | **M 6** | **M 7** | **M 8** | **M 9** | **M 10** | **M 11** | **M 12** | **M 13** | **M 14** | **M 15** | **M 16** | **M 17** | **M 18** | **M 19** | **M 20** | **M 21** | **M 22** | **M 23** | **M 24** |
| **Activity 1.1 – Launch of the action (kick-off meeting, Budapest)** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 1.2 – Project coordination** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 1.3 – Financial coordination** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 2.1 – DPAs’ effort to raise awareness among SMEs** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 2.2 – SMEs’ experience with the GDPR** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 2.3 – Validation workshop (W1, Dublin)** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.1 – Establish the awareness raising campaign** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.2 – Run the awareness raising campaign** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.3 – Establish the trial hotline** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.4 – Operate the hotline** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.5 – Statistical analysis of the questions raised by SMEs** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 3.6 – Validation workshop (W2, Brussels) – merged with W3 in the period between M17 and M21** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 4.1 – Draft Version of the guidance & handbook** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 4.2 – Validation workshop (W3, Dublin) – merged with W2 in the period between M17 and M21** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 4.3 – Final versions of the guidance & handbook** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 4.4 – Launch event for the guidance & handbook** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 5.1 – Project communication tools** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 5.2 – Journal articles and trade press articles** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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| **Activity 5.3 – Distribution of the guidance and handbook** |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
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## 3. BUDGET IMPLEMENTATION

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| --- | --- | --- |
| **Budget implementation —****Use of resources** | | **YES/NO** |
| We confirm that the overall budget consumption is in line with the advancement of the activities.  *If there are major deviations, identify them and explain the reasons why.* | | YES |
|  | |
| Indicate the amounts spent by the consortium on each budget category since the beginning of the project. | | |
| Budget category | Total amount  (EUR) | |
| A. Direct personnel costs | NAIH : 13 388,30 EUR  TRI IE :  VUB : | |
| B.1 Direct travel costs | NAIH: 1916,50 EUR  TRI IE:  VUB: | |
| B.2 Direct subsistence costs | NAIH: N/A  TRI IE:  VUB: | |
| C. Direct subcontracting costs | NAIH: N/A  TRI IE:  VUB: | |
| D. Direct costs of financial support to third parties | Not applicable | |
| E. Other direct costs | NAIH: 46 458,52 EUR (costs of the awareness raising campaign – recording and broadcasting; Kick-off meeting lunch)  TRI IE:  VUB: | |

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## ANNEXES

**LIST OF ANNEXES**

***NA***

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| --- | --- | --- |
| HISTORY OF CHANGES | | |
| VERSION | PUBLICATION DATE | CHANGE |
| v0.1 | 01.08.2019 | Initial version |
| v0.2 | 08.08.2019 | First version |
| v0.3 | 09.08.2019 | Request sent to Partners for contribution |
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