

**STAR II**

SUPPORT SMALL AND MEDIUM ENTERPRISES ON THE DATA PROTECTION REFORM II

# Minutes from the kick-off meeting

Deliverable **D1.1**

version 1.0



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Budapest – Brussels – Dublin  
September 2018

distribution level: **confidential**



**LSTS**  
LAW, SCIENCE,  
TECHNOLOGY &  
SOCIETY STUDIES  
VRIJE UNIVERSITEIT BRUSSEL

**TRILATERAL  
RESEARCH**



**A report prepared for the European Commission's Directorate-General for Justice and Consumers (DG JUST).**

The STAR II project (*Support small And medium enterprises on the data protection Reform II; 2018-2020*) is co-funded by the European Union under the Rights, Equality and Citizenship Programme 2014-2020 (REC-RDAT-TRAI-AG-2017) under Grant Agreement No. 814775.

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## Table of Contents

<b>1</b>	<b>BACKGROUND TO THE STAR II PROJECT</b>	<b>4</b>
<b>2</b>	<b>MINUTES FROM THE STAR KICK-OFF MEETING (KOM)</b>	<b>4</b>
2.1	DATA AND PLACE	4
2.2	PARTICIPANTS	5
2.3	MINUTES OF THE MEETING	5
<b>3</b>	<b>OUTCOMES OF THE KICK-OFF MEETING</b>	<b>7</b>
<b>4</b>	<b>ANNEXES</b>	<b>8</b>
4.1	THE AGENDA	8
4.2	LIST OF ATTENDANCE	9

## 1 Background to the STAR II project

The EU data protection reform, largely comprised of the General Data Protection Regulation (GDPR), was only concluded in April 2016, and the GDPR became applicable across the EU on 25 May 2018. This has left a short period of time for especially small and medium enterprises (SMEs) to adapt to the new regulatory environment. The novelties it brings to the fore, such as specific provisions concerning SMEs [e.g. recitals 13, 132; Art 30(5)], data protection by design (Art 25) and data protection impact assessment (DPIA; Art 35), only add to this complication.

SMEs often need external assistance to understand the gravity of the new Regulation; they need guidance on how to follow their respective Member State national legislation giving full effect to the GDPR; they need to adapt their routine practices; they need to acquire information, solve new or hitherto unnoticed issues and follow trainings on the new legislation; they often need to create and execute an action plan to apply the new framework. In addition, a considerable number of SMEs will need to appoint a data protection officer (DPO), who should immediately become the locus of knowledge and expertise on the GDPR and assist them in the implementation of the new regulatory framework requirements.

There are pressing needs to assist EU data protection authorities (DPAs) in raising awareness among businesses, especially SMEs, on the new EU legal framework for personal data protection, particularly the GDPR, and assist these SMEs in ensuring compliance therewith. Some 22 million European SMEs – the core of EU enterprise policy – not only face distinctive challenges from data protection law, but also – despite specific, often protective regulation – rarely can afford professional legal advice. Thus they merit special support from public authorities. The STAR II project will directly address these needs and will:

- 1) review the state of the art in DPA awareness-raising activities,
- 2) analyse SMEs' experience within first months of the functioning of the GDPR,
- 3) run an awareness raising campaign for SMEs,
- 4) establish and operate an e-mail hotline (12 months) to respond to SMEs' questions, measuring its performance and the most frequently asked questions,
- 5) prepare a digital guidance for DPAs on good practices in running an e-mail hotline and raising SME awareness, and
- 6) draft an innovative, FAQ-based handbook (digital and printed) for SMEs on EU personal data protection law.

These results will be prepared in consultation with stakeholders (especially via validation workshops and the External Advisory Board) and widely disseminated. The outputs will be freely available, openly accessible and copyright-unrestricted, thus easily reusable and adaptable. STAR II is addressed to 40+ EU DPAs and millions of EU SMEs. It will deliver tangible and long-term results to SMEs, directly assisting them in compliance with the GDPR (by hotline and guidance material) and – indirectly – to DPAs, to assist in their awareness-raising mission.

## 2 Minutes from the STAR II Kick-off meeting (KOM)

### 2.1 Data and place

**Date:**

Monday, 10 September 2018, from 10:00 till 15:00

**Place:**

Nemzeti Adatvédelmi és Információszabadság Hatóság,  
Szilágyi Erzsébet fasor 22/C.  
H-1125 Budapest  
Hungary

## 2.2 Participants

- 1) **Dr. Júlia Sziklay**, Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
- 2) **Gábor Kulitsán**, Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
- 3) **Péter Bazsa**, Nemzeti Adatvédelmi és Információszabadság Hatóság (NAIH)
- 4) **Lina Jasmontaite**, Vrije Universiteit Brussel (VUB) – Research Group on Law, Science, Technology & Society (LSTS)
- 5) **István Máté Böröcz**, Vrije Universiteit Brussel (VUB) – Research Group on Law, Science, Technology & Society (LSTS)
- 6) **Dr. David Barnard-Wills**, Trilateral Research Limited (TRI IE)
- 7) **Dr. Filippo Marchetti**, Trilateral Research Limited (TRI IE)

## 2.3 Minutes of the meeting

### ▪ Agenda item 1 - Opening remarks and the adoption of the agenda

The meeting was chaired by Dr. Júlia Sziklay (NAIH). After preliminary remarks and welcoming the participants, she invited the participants to provide comments on the agenda, if any. No issue was raised, so the agenda was adopted.

### ▪ Agenda item 2 - Discussion on the conduct of the STAR II project (2018-2020)

The partners discussed the main elements of the project, the roles and responsibilities of each partner and the importance of joint work. The most important issues during the discussion:

- Distribution of the EU contribution: The Partners discussed the suggestion of NAIH on the distribution method of the EU contribution. The pre-financed amount, i.e. 80% of the maximum grant amount has been already paid by the EU and arrived to NAIH. Due to technical and practical reasons NAIH suggested a work-package-based distribution method (so five times during the project, adjusted to the tasks to be performed during the given period) with the remark that the remaining 20% of the maximum grant amount would be distributed only at the end of the Project. The Partners also discussed the method of preparing and sending the necessary documents (timesheets, payslips, invoices, attendance lists, etc.) to the Co-ordinator. NAIH suggested to prepare the timesheets in a monthly breakdown and to send them (and the necessary documents) to the Co-ordinator at the end of the work packages. Lina (VUB-LSTS) suggested to include all these in the Consortium Agreement.
- Set-up of the External Advisory Board (EAB): The main question was what kind of roles and tasks will the EAB have. The Partners finally agreed that the EAB will review deliverables before submission and if necessary it will be involved to help achieve wider dissemination of materials.
- WP2 (State-of-the-art): Two separate questionnaires will be written: one for DPAs and the other (rather survey than questionnaire) for SMEs. TRI IE suggested that during Task T2.2 (*SME's experience with GDPR*) representatives of SME associations and not individual SMEs should be interviewed, so better and far-reaching conclusions can be drawn.
- Radio campaign: First it has to be decided what we want to draw attention to. The message should in any case be positive, and the text itself should be adjusted to the length of the spot, bearing in mind that at the end it should be mentioned that this initiative is an EU-co-funded project. The three basic elements of the message are: 1) new rules for processing of personal data; 2) duties and obligations of SMEs related to the GDPR; 3) where to turn for help.
- E-mail hotline: The primary languages would be English and Hungarian, secondary languages can include languages spoken by the Partners. If the Partners are unable to answer the question in the language in which it was written, an answer will be given in English. Questions

which could not be clarified yet (e.g. disclaimer on liability at the end of the answers, follow up on the quality of the answer) will be discussed later via e-mail.

- **Guidance and handbook:** STAR II will result in a concrete, ready-made, fully-customizable, white-label and freely available and reusable handbook on EU data protection law to be provided to SMEs, based on the most frequently asked questions by SMEs from the hotline and the responses to those questions. Furthermore, it will result in a guidance for DPAs on good practices in raising the awareness of SMEs about the GDPR. Although the (e-mail) hotline and the awareness-raising radio campaign will constitute the basis for the guidance and the handbook, Júlia noted that it would be essential to have some kind of guide containing the most relevant information and knowledge already available before setting up the hotline, so that the colleagues who actually would deal with the incoming e-mails can successfully prepare themselves. For the time being, the Partners have not agreed on which Partner and until when this guide should be prepared; there will be further discussions in this regard.
- **Validation workshops:** According to the timeline of the project 4 further workshops are planned during STAR II:
  - o W1 in Dublin in Month 7 (February 2019) -> deliverable D2.3,
  - o W2 in Brussels in Month 21 (April 2020) -> deliverable D3.4,
  - o W3 in Dublin in Month 17 (December 2019) -> deliverable D4.2,
  - o W4 in Budapest in Month 23 (June 2020) -> deliverable D4.4.

The Partners discussed that W2 and W3 (and consequently D3.4 and D4.2) could be joined and instead of two workshops and deliverables only one workshop would be organized (in Brussels) and one deliverable would be submitted in the period between December 2019 and April 2020. The reason for that is that WP3 (*Hotline & awareness-raising campaign for SMEs*) and WP4 (*Guidance for DPAs & handbook for SMEs*) are strongly interconnected and by joining two workshops financial resources could be released and travel costs available for the Partners could be optimized, so members of the EAB could be invited to that workshop and their travel costs could be financed from the amount released.

After the KOM the Co-ordinator contacted the temporary Project Officer (PO) through the Participant Portal (PP) and asked her whether it is possible to join the two workshops and whether the travel (and maybe the accommodation) costs of the members of the EAB could be financed from project-money. On 12 September 2018 the PO confirmed that it is possible to group the two workshops. She also informed the Co-ordinator 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. Regarding the EAB the PO stated that there is, in principle no problem to finance the travel and/or accommodation costs of the members, however, they need to come from eligible countries.

- **Logo:** The STAR II logo will be a slight modification of the STAR I logo: one more yellow or blue star will be added. István said that VUB will design it with a close deadline
- **Website:** The consortium will continue using the existing website of the STAR project (<http://www.project-star.eu>), subject to necessary amendments, e.g. a clear separation of materials for different audiences.
- **Social media:** 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.
- **Bi-monthly newsletters:** Júlia informed the Partners that based on preliminary informal consultations, the Hungarian Chamber of Commerce and Industry is willing to ensure the appearance of STAR II related contents in their own regularly issued newsletter.

▪ **Agenda item 3 - Adoption of rules, deliverable templates, standards, etc.**

The existing mailing list at [star@listserv.vub.ac.be](mailto:star@listserv.vub.ac.be) will be used for STAR II as well. To avoid confusions Partners agreed that in the subject filed of the e-mails it should be indicated whether the e-mail concerns STAR I or STAR II.

The Partners agreed on having teleconferences on regular basis in order to update each other about the progress of work, discuss the next steps and solve potential issues, if any. The platform will be Skype as in STAR I.

The Partners decided that every deliverable should be sent to internal review to the other two partners to add another layer of quality control, i.e. in addition to the EAB. The method will be the same as in STAR I.

The Partners discussed that the term “hotline” may be misleading. As the primary communication platform will be e-mail, using the term “helpdesk” would be better.

The Partners agreed that the deliverable template created by VUB during STAR I will be used throughout STAR II as well.

As there were some questions which should be settled in the Consortium Agreement, it could not be finalised and signed by the Partners during the meeting. The Partners agreed that the Co-ordinator modify the draft CA accordingly, then the document will be circulated and if it is finalised, the partners will sign it one-by-one.

▪ **Agenda item 4 – A.O.B.**

None.

The meeting finished at 15:00

### **3 Outcomes of the kick-off meeting**

During the Kick-off Meeting, the STAR II Consortium reached the following agreements:

- 1) The Co-ordinator will include the distribution method of the EU contribution in the Consortium Agreement. Then the CA will be circulated among the Partners in order to have it finalised and signed as soon as possible.
- 2) The Co-ordinator will develop a uniform time sheet form.
- 3) Each Partner will propose three candidates to the External Advisory Board until 20 September 2018. After the consortium compiles a list of suggested members, the Co-ordinator will initiate the communication with potential members with a view to have a fully operational External Advisory Board set up at latest by mid-November, so that deliverable D1.4 (*Composition of Advisory Board*) can be submitted by the given deadline (30 November 2018).
- 4) NAIH will draft and issue a press release on the project launch possibly by the end of September.
- 5) TRI IE will draft questionnaires / surveys for DPAs (open questions) and SMEs (preset questions) with regard to the recipients' experience and needs. Then the Partners will conduct the interviews based on the same breakdown by country as in STAR I.
- 6) NAIH will draft the text of the radio spot and the internal rules on the operation of the hotline.
- 7) Teleconferences will be held regularly through Skype, organized by the Co-ordinator.
- 8) VUB will prepare a logo for the project. This is essentially a small modification of the STAR I logo.
- 9) VUB will examine the possibilities of incorporating the project's website into the existing website of the STAR I project. The already existing Twitter and LinkedIn accounts will be expanded with STAR II and updates and developments related to the STAR II will also appear on ResearchGate.

- 10) Every deliverable will be sent to internal review to the other two partners to add another layer of quality control, i.e. besides the EAB.
- 11) The questions remained open will be discussed as soon as possible via e-mail.

## 4 Annexes

### 4.1 The agenda

1. **Opening remarks and the adoption of the agenda**
2. **Discussion on the conduct of the STAR II project (2018-2020):**
  - Overview of the aims, structure and timeline of the project
  - Discussion on the project management and budget
    - discussion of the allowance distribution method (NAIH suggestion: WP based distribution method – 5 times during the project, in proportion of 20%-40%-20%-10%-10%)
    - discussion of the technical details of the reporting (the method of preparing and sending the required documents): preparing the timesheets in a monthly breakdown; sending the timesheets, payslips, invoices, attendance lists, etc. to the Co-ordinator at the end of the WP-s
  - Clarifications as to the activities to be undertaken:
    - the set-up of the Advisory Board: suggestion of the possible members
    - interviews with the DPAs and contacting SMEs (DPA's awareness raising efforts and SME's experience with the GDPR) – tasks to be undertaken in detail
    - the identification of the needs of the SMEs – methods to identify and reach SMEs
    - establishment of the radio campaign (*April-May 2019*) – discussion of the text and scenarios of the radio spot
    - the operation of the hotline – languages of the hotline; contact to the persons who will help in other languages; preparing a guide / training material for the colleagues of the hotline (extract of the handbook? deadline?)
    - statistical analysis of the questions raised by the SMEs
    - drafting and translation of the handbook and the guidance – planned length of the handbook and the guidance
  - Discussion on the organization and participation in the events related to the project (*2019-2020*)
    - organization of three validation workshops; finalization of the location of the workshops
    - the final conference (June 2020, Budapest)
  - Discussion on the dissemination strategy:
    - decision on the logo
    - project's website
    - project's social media accounts
    - press releases
    - peer-reviewed articles and other publications
    - bi-monthly newsletter



- Clarifications as to the role of each partner in each activity
- Confirming the responsible contributions to deliverables

**3. Adoption of:**

- Rules for the internal review of work
- Deliverable templates
- Standard terminology used in deliverables
- Standards of internal and external communication: mailing list, periodic coordination meetings and/or monthly conference calls, etc.
- Standards for “pooling” contacts and knowledge
- Standard reference system
- Finalization and signature of the Consortium Agreement

**4. A.O.B.**

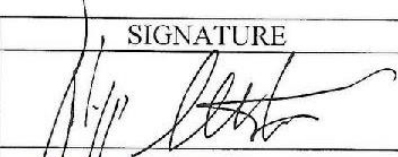


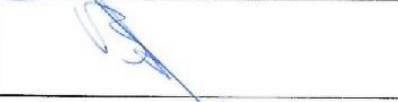

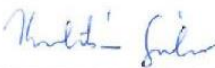
- STAR I – open questions

**4.2 List of attendance**

Attendance list of the Kick-off Meeting of the „Support  
small And medium enterprises on the data protection  
Reform II” – (STAR II) project

REC-RDAT-TRAI-AG-2017 814775

10 September 2018

NAME	PARTNER	SIGNATURE
Dr. Filippo MARCHETTI	Trilateral Research Ltd.	
Dr. David BARNARD-WILLS	Trilateral Research Ltd.	
Lina JASMONTAITE	Vrije Universiteit Brussel	
István Máté BÖRÖCZ	Vrije Universiteit Brussel	
Dr. Júlia SZIKLAY	Nemzeti Adatvédelmi és Információszabadság Hatóság	
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