



## Online and Mobile Communications for Crisis Response and Search and Rescue

Approval by Finnish National Data  
Protection Authority  
WP2 | Task 2.6 | D2.264



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# Approval by Finnish National Data Protection Authority

iSAR+

## Online and Mobile Communications for Crisis Response and Search and Rescue

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**Abstract:**

iSAR+ Project aims to research and develop guidelines and recommendations for the efficient use of social media and mobile technology for crisis response and search and rescue. The project develops an associated platform that, in emergencies or crises, enables citizens using new mobile and online technologies to participate in the response effort, through the bi-directional provision, dissemination, sharing and retrieval of information.

The iSAR+ concept (guidelines and platform) are validated in user showcases, carried out in the end-user's environments. The third user showcase will be performed in Finland. User showcase requires individuals' use of iSAR+ prototypes, and therefore coordinators of the showcase have undertaken effort to receive approval by National Data Protection Authority for the showcase. This process and the statement of the Finnish office of the data protection ombudsman is described in this document.

<sup>1</sup> Nature of deliverable: **R** = Report; **P** = Prototype; **D** = Demonstrator; **O** = Other

<sup>2</sup> Dissemination level: **PU** = Public; **PP** = Restricted to other programme participants (including the Commission Services); **RE** = Restricted to a group specified by the consortium (including the Commission Services); **CO** = Confidential, only for members of the consortium (including the Commission Services).

<sup>3</sup> Sensitive content: **Y** = Deliverable contains sensitive material; **N** = Deliverable does not contain sensitive material.



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## Executive Summary

iSAR+ Project aims to research and develop guidelines and recommendations for the efficient use of social media and mobile technology for crisis response and search and rescue. The project develops an associated platform that, in emergencies or crises, enables citizens using new mobile and online technologies to participate in the response effort, through the bi-directional provision, dissemination, sharing and retrieval of information.

The iSAR+ concept, guidelines and platform, are validated in user showcases, carried out in the end-user's environments. Showcases have been conducted in Portugal in October 2013 and in France in September 2014. The third user showcase will be organised in Finland in February 2015. The user showcase requires individuals' use of iSAR+ prototypes, and therefore Emergency Services College as the coordinator of the Finnish showcase have undertaken effort to receive approval by The Office of the Data Protection Ombudsman (Finnish National Data Protection Authority) for the showcase.

The approval was asked by requesting a statement considering the Finnish user showcase from the Office of the Data Protection Ombudsman. Within this request a description of iSAR+ -project and the related showcase was provided for the office. The use and collecting of data in the Finnish user showcase was explained, as well as the use of participants' individual informed consent forms highlighted.

The answer the Office of the Data Protection Ombudsman gave for the request for a statement stated that as The Finnish Data Protection Ombudsman has no acceptance or permission procedure for processing personal data, the controller has the duty to process personal data according to the law. Coordinator of the Finnish showcase, Emergency Services College will therefore evaluate, according to the request of the Data Protection Ombudsman, whether the data processed is personal and if needed, ensure that data protection rules will be applied in the Finnish user showcase.



**Table of Contents**

Document History ..... 3  
Document Authors..... 3  
Executive Summary ..... 4  
List of Tables..... 6  
List of Acronyms..... 7  
1 Introduction ..... 8  
    1.1 The iSAR+ project..... 8  
    1.2 Objectives of this deliverable..... 8  
2 Description of the iSAR+ project and user showcase provided for the Office of the Data Protection Ombudsman..... 9  
3 Answer of the Office of the Data Protection Ombudsman.....11  
Annex A. Answer of the Office of the Data Protection Ombudsman.....12



## List of Tables

Table 1 – List of acronyms. .... 7



## List of Acronyms

Acronym	Meaning
EU	European Union
FP7	Seventh Framework Programme
FR	First Responder
iSAR+	Online and Mobile Communications for Crisis Response and Search and Rescue
PPDR	Public Protection and Disaster Relief (organisations / operators)
THEO	Technological, Human, Ethical & Organisational

**Table 1 – List of acronyms.**



# 1 Introduction

## 1.1 *The iSAR+ project*

iSAR+ - Online and Mobile Communications for Crisis Response and Search and Rescue - project studies the usage of social media and mobile technologies in crisis management. The project aims at developing guidelines and an associated technological platform to provide instructions and recommendations for citizens and PPDRs for an effective and efficient use of new communication/social media in crisis situations. iSAR+ is EU FP7 co-funded project with 16 organisations from nine different countries.

The usage of social media in crisis management is studied under the lenses of THEO multi-dimensional analytical framework, which embraces the Technological, the Human, the Ethical and Legal and the Organisational dimensions. THEO's Technological dimension considers the integration of current ICT tools for crisis, equipment, communications, information processing technologies and current standards into crisis management systems, whereas the Human dimension focuses on the citizens' multi-cultural perspectives on the acceptance and adequate employment of social media in crisis situations. The perspective of FRs and PPDRs is dealt in the Organizational dimension, which explores how to adapt these organizations to work with social media, building their trust and facilitating the process of introducing social media into their operational processes to deliver a more effective and efficient response. Finally, the Ethical and Legal dimension addresses the ethical and legal framework concerns and waivers emerging from the debate on the boundaries of privacy rights and public security, with respect to the integration of social media in crisis response efforts.

The iSAR+ prototype, concept and platform are demonstrated in user showcases, carried out in the end-user's environments. Showcases are the chosen approach to validate the project's results and to collect feedback, recommendations and lessons learned resulting from the end-users' (PPDRs and citizens) experience with the iSAR+ prototype. Showcases have been conducted in Portugal in October 2013 and in France in September 2014. The third showcase will be organised in Finland in February 2015.

## 1.2 *Objectives of this deliverable*

iSAR+ prototype, concept and platform, are validated in user showcases carried out in the end-users' environments. The third user showcase will involve the Finnish end-users community. The direct involvement of individuals in the iSAR+ user showcase and the individuals' use of the iSAR+ raises concerns related to data protection and privacy. Therefore effort has been undertaken to receive an approval from the Finnish national data protection authority (the Office of the Data Protection Ombudsman) for the showcase. This deliverable describes the process to receive the approval for the showcase and the answer provided by the Office of the Data Protection Ombudsman.





## 2 Description of the iSAR+ project and user showcase provided for the Office of the Data Protection Ombudsman

The Finnish Data Protection Authority is called the Office of the Data Protection Ombudsman and it is an independent authority operating in connection with the Ministry of Justice. The office is run by the Data Protection Ombudsman, appointed by the Council of State for a term of five years. The Office of the Data Protection Ombudsman gives guidance and controls the processing of personal data as well as provides consultation.

As a coordinator of the third showcase Emergency Services College (ESC) has undertaken effort to receive the approval of the Office of the Data Protection Ombudsman for the Finnish showcase. ESC contacted the Office of the Data Protection Ombudsman first in June 2014 and was given instructions for approaching the office with the matter. Request for a statement was made on 17.6.2014.

The request for a statement included a brief presentation of the iSAR+ -project, the purpose, aims and outlines of the iSAR+ user showcase. Also the features that the iSAR+ prototype contains and which will be used by the end-user representatives during the showcase were presented.

The data that will be used in the user showcase was also described in the request for a statement. During the user showcase, both data that has been collected and anonymized in advance will be used, and real data produced by volunteers participating in the user showcase.

The scenario of the Finnish showcase is a case of a winter storm and incidents caused by the storm. The data gathered in advance will consist of actual, but anonymized updates in social media during some of the past winter storms in Finland. Gathering of this data will be done respecting the terms and conditions of the social media services used as data source. Statistics from the statistics system of Finnish rescue services (PRONTO) will be utilised. The means of secure storage of the data gathered for the purpose of the user showcase and the data produced during the showcase was presented in the request for a statement. It was also pointed out that the data will only be used for the purpose of the project and that it will be erased from the systems used after the user showcase.

Since the user showcase will have an active participation of the iSAR+ end-users community, the roles of the players in the showcase were described in the request for the statement. It was also highlighted that participation in the user showcase will happen on the basis of informed consent. Participants will fill consent forms that indicate the nature of the project and the use of the data gathered before, during and after the user showcase.

Information form and consent form were attached to the request for a statement. It was also brought to the attention of the office that in order to collect feedback from the participants, user experiences will be collected by a questionnaire after the showcase, where demographic information of the participant will be asked. Reporting of the feedback will be carried out in a manner where an individual participant can't be recognized. This information will only be used within the project. The participants will have a right to withdraw themselves from the showcase at any time without the need of any explanation.

Based on given information, Emergency Services College asked for a statement from the Office of the Data Protection Ombudsman for the Finnish showcase.





### 3 Answer of the Office of the Data Protection Ombudsman

The answer to the request on a statement from the Office of the Data Protection Ombudsman given 2.9.2014 is as follows (statement in appendix 1):

"Referring to your letter "Lausuntopyyntö Tietosuojavaltuutetun toimistolle", arrived 17.6.2014

The Office of the Data Protection Ombudsman in Finland has received your email regarding research called "iSAR+ - Online and Mobile Communications for Crisis Response and Search and Rescue (1/2013 – 7/2015)".

According to Personal Data Act Section 2 "The provisions of this Act apply to the processing of personal data, unless otherwise provided elsewhere in the law." Personal data means any information on a private individual and any information on his/her personal characteristics or personal circumstances, where these are identifiable as concerning him/her or the members of his/her family or household. It is important to notice that person might still be "identifiable" because that information combined with other pieces of information (whether the latter is retained by the data controller or not) will allow the individual to be distinguished from others. According to your letter you are not planning to collect identifiable data. If so, the Personal Data Act does not apply. I ask you to evaluate, if the data processed is personal data according to guidance given above. If the data is personal data, data protection rules must be applied.

English version of the Personal Data Act:

<http://www.finlex.fi/en/laki/kaannokset/1999/en19990523>

The Finnish Data Protection Ombudsman does not have any acceptance or permission procedure for processing personal data. The controller has the duty to process personal data according the law. More information about the data protection is available at the website of the Office of the Data Protection Ombudsman [www.tietosuojaja.fi](http://www.tietosuojaja.fi).

Senior Inspector Raisa Leivonen  
Office of the Data Protection Ombudsman"

As The Finnish Data Protection Ombudsman has no acceptance or permission procedure for processing personal data, the controller has the duty to process personal data according to the law. Coordinator of the Finnish showcase, Emergency Services College will therefore evaluate, according to the request of the Data Protection Ombudsman, whether the data processed is personal and if needed, ensure that data protection rules will be applied in the Finnish user showcase.

## Annex A. Answer of the Office of the Data Protection Ombudsman



OFFICE OF THE DATA PROTECTION OMBUDSMAN

1636/05/2014

02.09.14

Emergency Services College  
Esa Kokki  
tutkimus@pelastusopisto.fi

Referring to your letter "Lausuntopyyntö Tietosuojavaltuutetun toimistolle",  
arrived 17.6.2014

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Senior Inspector Raisa Leivonen

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