



## EUROPEAN RESEARCH EXECUTIVE AGENCY (REA)

The Director

Brussels,  
REA

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**Subject: REA decision on your request of access to documents – implementation of the judgment of the General Court of 15 December 2021 in Case T-158/19 Breyer v REA**

Dear Mr Breyer,

We refer to the [judgment of 15 December 2021](#) in Case T-158/19 Breyer v REA (hereinafter ‘*the judgment*’), whereby the General Court partially annulled the decision of European Research Executive Agency (REA) of 17 January 2019 on your request for access to documents in relation to the **iBorderCtrl project** submitted under Regulation (EC) No 1049/2001 regarding public access to European Parliament, Council and Commission documents<sup>1</sup> (hereinafter ‘*Regulation 1049/2001*’)<sup>2</sup>.

In the judgment, the Court upheld some of the pleas because it considered that in the mentioned decision REA:

1. Failed to rule on your request for access to documents relating to the authorisation of the iBorderCtrl project;

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<sup>1</sup> Regulation (EC) N° 1049/2001 of the European Parliament and of the council of 30 May 2001 regarding public access to European Parliament, Council and Commission documents, EU OJ L 145, 31.5.2001, p.43.

<sup>2</sup> Ares(2019)266593.

2. Refused full access to document D1.3, partial access to documents D1.1, D1.2, D2.1, D2.2 and D2.3, as well as wider access to documents D3.1, D7.3 and D7.8, in so far as those documents contain information not entirely covered by the exception referred to in the first indent of Article 4(2) of Regulation 1049/2001.

Hereby, in accordance with Article 266 of the Treaty on the Functioning of the European Union (TFEU)<sup>3</sup>, REA takes a new decision pursuant to Article 8 of Regulation 1049/2001. This decision replaces the one of 17 January 2019 as far as it concerns the documents relating to the authorisation of the project and the following deliverables:

- D1.1 Ethics advisor's first report
- D1.2 Ethics of profiling, the risk of stigmatization of individuals and mitigation plan
- D1.3 Ethics Advisor
- D2.1 Requirement Analysis Report
- D2.2 Reference Architecture and components specifications
- D2.3 EU wide legal and ethical review report
- D3.1 Data Collection Devices – specifications
- D7.3 Dissemination and communication plan
- D7.8 Dissemination and communication plan 2.

Please note that as far as deliverables D8.1 Quality Management Plan, D8.3 Periodic Progress Report, D8.4 Annual Report, D8.5 Periodic Progress Report 2 and D8.7 Annual Report 2 are concerned, the REA decision of 17 January 2019 of non-disclosure remains valid, pending the assessment of the Court of Justice in the appeal notified to REA on 3 March 2022 ([Case C-135/22 P Breyer v REA](#)).

## **I. BACKGROUND**

On 16 February 2022<sup>4</sup>, we informed you of our intention to take the necessary measures to comply with the judgment, in accordance with Article 266 TFEU, and that an assessment was on-going for the implementation of it.

On 29 April 2022<sup>5</sup>, in accordance with Article 6(2) of Regulation 1049/2001, we sent you a request for clarifications for the part of the initial request to access to documents relating to the authorisation of the iBorderCtrl project (documents under point 1 above).

On 16 May 2022, you replied indicating that you requested access to the following documents (hereinafter '*documents relating to the authorisation of the project*')

- The application (proposal) received for the iBorderCtrl project including the ethics self-assessment;
- All documents on the evaluation by the evaluation committee;

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<sup>3</sup> "The institution whose act has been declared void or whose failure to act has been declared contrary to the Treaties shall be required to take the necessary measures to comply with the judgment of the Court of Justice of the European Union.

*This obligation shall not affect any obligation which may result from the application of the second paragraph of Article 340."*

<sup>4</sup> Ares(2022)1133637.

<sup>5</sup> Ares(2022)3316561

- All additional documents from the grant preparation phase submitted or otherwise created in relation to ethics (e.g. pre-screening results, screening results, Ethics review results and requirements);
- The additional descriptions of the action (DOA) received within the phase of grant preparation;
- The final Grant Agreement and additionally Annex 1 with its so-called Parts A and B, including all other supporting documents submitted by the parties in this regard;
- The consortium agreement.

## II. ASSESSMENT

Following the judgment, we have conducted an assessment of the concerned documents in light of the provisions of Regulation 1049/2001 and the General Court's considerations.

You will find in Annex 1 attached to this letter:

- The list of 45 documents related to the project iBorderCtrl and falling within the scope of the decision<sup>6</sup> and
- The status of disclosure of each document and the related legal grounds for partial disclosure or non-disclosure.

Following this assessment, I am pleased to inform you that REA will grant you:

- i. **Full access to:**
  - Doc.9 - Ethics Summary Report
  - Doc.28 - Annex 4 - Model for the Financial statement
  - Doc.29 - Annex 5 - Model for the certificate on the financial statements
  - Doc.30 - Annex 6 - Model for the certificate on the methodology
  - Doc.33 - Commission Decision C(2016)2097
- ii. **Full access, with personal data expunged, to:**
  - Doc.6 – Result of evaluation of proposal/Invitation to grant preparation
  - Doc.10 to 22 - GA declarations submitted under GAP
  - Doc.39 - Deliverable D1.3 Ethics Advisor
- iii. **Partial access to:**
  - Doc.1 - Project proposal
  - Doc.5 - Consensus Report
  - Doc.7 - Evaluation Summary Report (ESR)
  - Doc.8 - Security Scrutiny Report
  - Doc.23 - Legal Financial Viability
  - Doc.24 - Annex 1 – description of the action (part A)
  - Doc. 25 - Annex 1 – description of the action (part B)
  - Doc.26 - Annex 2 – estimated budget of the action
  - Doc.27 - Annex 3 – accession forms
  - Doc.31 - Signed Grant Agreement

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<sup>6</sup> Please note that “iCross” is the former acronym of the project iBorderCtrl; the acronym was changed by an amendment as of 2 June 2017. Hence, any reference to iCross in the disclosed documents should be read as reference to iBorderCtrl.

- Doc.32 - Grant Agreement data sheet
- Doc.34 - Comparison of project beneficiaries before and after grant preparation
- Doc.35 - Full Grant Preparation Report
- Doc.36 - Short Grant Preparation Report
- Doc.37 - Deliverable D1.1 Ethics advisor's first report
- Doc.38 - Deliverable D1.2 Ethics of profiling, the risk of stigmatization of individuals and mitigation plan
- Doc.40 - Deliverable D2.1 Requirement Analysis Report
- Doc.41 - Deliverable D2.2 Reference Architecture and components specifications
- Doc.42 - Deliverable D2.3 EU wide legal and ethical review report

iv. **Wider partial access to:**

- Doc.43 - Deliverable D3.1 Data Collection Devices – specifications
- Doc.44 - Deliverable D7.3 Dissemination and communication plan
- Doc.45 - Deliverable D7.8 Dissemination and communication plan 2.

As regards the expunged parts of these documents, they are covered by the exceptions of Article 4(1)(b), privacy and the integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data, and of Article 4(2), first indent, commercial interests of a natural or legal person, for the reasons set out below.

No access can be granted to Doc. 2, 3 and 4 - the Individual Evaluation Reports (IER) - because these documents are entirely covered by the exception of Article 4(3), second subparagraph, the decision-making process, for the reasons set out below.

## **II.1 Protection of privacy and integrity of the individual**

Pursuant to Article 4(1)(b) of Regulation 1049/2001, access to a document has to be refused if its disclosure '*would undermine the protection of privacy and integrity of the individual, in particular in accordance with Community legislation regarding the protection of personal data*'.

The applicable legislation in this field is Regulation (EU) No 2018/1725 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data (hereinafter "*Regulation 2018/1725*")<sup>7</sup>.

Some of the documents to which you requested access (i.e. Doc. 1, 2, 3, 4, 5, 6, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 25, 27, 31, 37, 38, 40, 42) contain personal data of individuals, such as names of experts and staff members, addresses, CVs, individual opinions, that are not in the public domain. Indeed, Article 3(1) of Regulation 2018/1725 provides that personal data '*means any information relating to an identified or identifiable natural person [...]*'. The Court of Justice has specified that any information, which by reason of its content, purpose or effect, is linked to a particular person is to be considered as personal data<sup>8</sup>.

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<sup>7</sup> Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, EU OJ L 205 of 21.11.2018, p. 39.

<sup>8</sup> Judgment of the Court of Justice of the European Union of 20 December 2017 in Case C-434/16, Peter Nowak v Data Protection Commissioner, request for a preliminary ruling, paragraphs 33-35, [ECLI:EU:C:2017:994](https://eur-lex.europa.eu/eli/eurj/2017/994).

In its Judgment in Case C-28/08/P<sup>9</sup>, the Court of Justice ruled that when a request is made for access to documents containing personal data, the Data Protection Regulation becomes fully applicable.

Pursuant to Article 9(1)(b) of Regulation 2018/1725, *‘personal data shall only be transmitted to recipients established in the Union other than Union institutions and bodies if [t]he recipient establishes that it is necessary to have the data transmitted for a specific purpose in the public interest and the controller, where there is any reason to assume that the data subject’s legitimate interests might be prejudiced, establishes that it is proportionate to transmit the personal data for that specific purpose after having demonstrably weighed the various competing interests’*. Only if these conditions are fulfilled, and the processing is lawful in accordance with the requirements of Article 5 of Regulation 2018/1725, can the transmission of personal data occur.

Therefore, according to Article 9(1)(b) of Regulation 2018/1725, REA has to examine the further conditions for a lawful processing of personal data only if the first condition is fulfilled, namely if the recipient has established that it is necessary to have the data transmitted for a specific purpose in the public interest. It is only in this case that REA has to examine whether there is a reason to assume that the data subject’s legitimate interest might be prejudiced and, in the affirmative, establish the proportionality of the transmission of the personal data for that specific purpose.

We consider that you have not established the necessity to have the data transmitted for a specific purpose in the public interest. Therefore, REA does not have to examine whether there is a reason to assume that the data subject’s legitimate interest might be prejudiced.

Consequently, I conclude that, pursuant to Article 4(1)(b) of Regulation 1049/2001, access cannot be granted to the personal data contained in the mentioned requested documents.

## **II.2 Protection of commercial interests**

In accordance with Article 4(2), first indent, of Regulation 1049/2001, *‘an institution shall refuse access to a document where disclosure would undermine the protection of commercial interests of a natural or legal person, including intellectual property, [...], unless there is an overriding public interest in disclosure’*.

Some of the documents to which you requested access (i.e. Doc. 1, 5, 7, 8, 23, 24, 25, 26, 27, 31, 32, 34, 35, 36, 37, 38, 40, 41, 42, 43, 44, 45) contain commercially sensitive information about financial data, know-how, methodology, techniques and strategies developed by the members of iBorderCtrl consortium, as well as the individual scores by criterion given to the proposal during the evaluation.

More precisely:

- Doc. 1, 24, 25, 31 32, 34, 35 and 36 contain information about the implementation of the project and the underlying mechanisms and procedures revealing commercially sensitive elements used or developed by the members of consortium. This includes know-now, commercial relationships, system architecture and design, technologies,

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<sup>9</sup> Judgment of 29 June 2010 in Case C-28/08/P, European Commission v The Bavarian Lager Co. Ltd, EU:C:2010:378, paragraph 59, [ECLI:EU:C:2010:378](#).

methodologies and operative procedures used, techniques and strategies developed and applied by the consortium members.

- Doc. 23, 26 and 27 contains financial data of the members of the consortium, including resources for the development of the project and information used for the legal and financial viability checks.
- Doc. 37, 38 and 42 (Deliverables D1.1, D1.2 and D2.3) include assessments of concrete ethics and legal implications of the iBorderCtrl project or solutions to develop technologies or methodologies within the project. In particular, deliverable D1.1 contains the description of how the ethical and legal concerns identified in documents D 1.2 and D 2.3 must in fact be taken into account when developing the various technological components and methods developed in the context of the iBorderCtrl project, both for the research phase and for a possible exploitation phase in order to ensure compliance with the ethical principles and fundamental rights invoked. Deliverable D1.2 contains the examination on the methodology according to which the iBorderCtrl project specifically addresses profiling and the risk of stigmatisation of both individuals and groups, the analysis of a problem of fake news ('false positive', 'false negative') of IT tools and an initial description of the project's risks and the relevant protection measures. Deliverable D2.3 explains in detail how the requirements of EU and national law are implemented in the different sub-areas of the technologies developed by the project.
- Doc. 40 and 41 (Deliverables D2.1 and D2.2) present technological solutions (e.g. new document analysis tools, advanced biometric technologies for identification) and the definition of the overall system architecture, thus providing the general framework for the various modules, including the functionalities of the hardware and software that will compose the final integrated system. In particular, D2.1 contains explanations of the survey methodology or the evaluation of the data obtained and the conclusions drawn from it for the developments of the iBorderCtrl project. D 2.2 describes in detail how the technical requirements are implemented in seven technologies developed by the project. In addition, the overall functional architecture of hardware and software is presented in detail. Finally, use cases for different types of travellers would be identified for future testing procedures.
- Doc. 43 (Deliverable D3.1) contains recommendations on the choice of the available technologies and techniques that would be optimal in the architecture of the iBorderCtrl system in the light of the technical requirements at stake. This assessment reflects the know-how of the consortium members, in particular in so far as their experience is combined with the public information collected, or the evaluation criteria are specifically designed by the members of the consortium.
- Doc. 44 and 45 (Deliverables D7.3, and D7.8) contain communication strategies with the commercial partners with a view to possible future cooperation.

This information has to be considered as inside knowledge of the members of the iBorderCtrl consortium. It reflects the specific intellectual property, on-going research, know-how, methodologies, techniques and strategies which belong to the members of the consortium.

The public disclosure of such information would undermine the commercial interests of the members of the iBorderCtrl consortium within the meaning of Article 4(2), first indent, of Regulation 1049/2001, as it would give an unfair advantage to the (potential) competitors of the consortium. By having access to the commercially sensitive information in the documents requested, the competitors would be able to profit from it, as follows.

First, the public disclosure would give the competitors the opportunity to anticipate the strategies and weaknesses of the partners of the iBorderCtrl consortium, including when competing in calls for tenders and proposals.

Secondly, the public disclosure would give their competitors the opportunity to copy or use the intellectual property, know-how, methodologies techniques and strategies of the iBorderCtrl consortium's members. The competitors would be able to employ this information in order to improve the production of their own competing products or provision of their own competing services. Furthermore, this would also result in the competitors having an unfair advantage when seeking and obtaining patents, approvals, authorisations and/or designations for their products or services.

Thirdly, the public disclosure would also undermine the possibilities of the members of the iBorderCtrl consortium to obtain funding from existing and potential new investors. Given the competitive environment in which the project consortium operates, the information in question can only maintain its commercial value if it is kept confidential.

Against this background, the disclosure would clearly adversely affect the competitive position of the iBorderCtrl consortium on the market and, in turn, seriously undermine their commercial interests, including their intellectual property.

I also wish to point out in this regard that, in accordance with Article 3 of H2020 Rules for participation, *"Subject to the conditions established in the implementing agreements, decisions or contracts, any data, knowledge and information communicated as confidential in the framework of an action shall be kept confidential, taking due account of Union law regarding the protection of and access to classified information."*

This confidentiality provision is implemented in the H2020 Model Grant Agreement. Its Article 36 stipulates that *"During implementation of the action and for four years after the period set out in Article 3, the parties must keep confidential any data, documents or other material (in any form) that is identified as confidential at the time it is disclosed ("confidential information")."*

Article 36 also provides that *"the Agency may disclose confidential information to its staff, other EU institutions and bodies. It may also disclose it to third parties, if (a) this is necessary to implement the Agreement or safeguard the EU's financial interests and (b) the recipients of the information are bound by an obligation of confidentiality."*

In the Grant Agreement for the project iBorderCtrl deliverables D1.1, D1.2, D2.1 D2.2, D2.3, D3.1, D7.3, D7.8 partially disclosed to you are currently listed as 'confidential', bearing the following confidentiality marking "Confidential, only for members of the consortium (including the Commission Services and/or REA Services)".

Please note that the General Court has addressed the issue of contractual confidentiality, under the EU Framework Programmes for Research and Innovation, in its *Technion*

judgment<sup>10</sup>. It ruled that, if a contractual clause in the Grant Agreement provides that the Commission must use the documents and information, provided by a beneficiary, on a confidential basis, those documents and information cannot (within the timeframe set out in the Grant Agreement) be disclosed or released to persons not party to the contract.

The General Court confirmed that “*disclosure of the documents on the basis of Regulation No 1049/2001 would undermine the very existence of that clause of the contract, inasmuch as it would allow persons not party to the contract, namely the general public, access to the abovementioned documents*”.

It is consistent case-law that when two regulations regulate access to documents, without one of them having precedence as in the present case, they have to be applied in a manner compatible with the other and which enables a coherent application of them<sup>11</sup>.

The exception of Article 4(2), first indent, of Regulation 1049/2001 must, therefore, be interpreted also in line with the confidentiality provisions of H2020 Rules for Participation and its implementing acts<sup>12</sup>.

Furthermore, the exception of Article 4(2), first indent, of Regulation 1049/2001 has to be read also in light of Article 339 of the Treaty on the Functioning of the European Union (TFEU), which requires staff members of the EU institutions to refrain from disclosing information of the kind covered by the obligation of professional secrecy, in particular information about undertakings, their business relations or their cost components.

I take the view that applying Regulation 1049/2001 cannot have the effect of rendering the above-mentioned provisions, over which it does not have precedence, ineffective.

In consequence, REA considers that there is a real and non-hypothetical risk that full access to the documents requested would undermine the commercial interests, including intellectual property, of the members of the iBorderCtrl consortium.

Therefore, for the expunged parts of the documents listed above and herewith partially disclosed, I confirm that access must be denied on the basis of the exception laid down in Article 4(2), first indent, of Regulation 1049/2001 and no further partial access is possible without undermining the interests described above.

### **III.3 Protection of the decision-making process**

Article 4(3), second subparagraph, of Regulation 1049/2001 provides that: ‘*access to a document containing opinions for internal use as part of deliberations and preliminary consultations within the institution concerned shall be refused even after the decision has been taken if disclosure of the document would seriously undermine the institution's decision-making process, unless there is an overriding public interest in disclosure*’.

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<sup>10</sup> Judgment of the General Court in *Technion v Commission*, T-480/11, EU:T:2015:272, paragraph 58.

<sup>11</sup> Judgment of 28 June 2012 in *Commission v Éditions Odile Jacob SAS*, C-404/10 P, EU:C:2012:393, paragraph 110.

<sup>12</sup> Judgment of 15 December 2021 in *Breyer v REA*, T-158/19, EU:C:2021:393, ECLI:EU:T:2021:902, paragraph 69.



Disclosure of documents 2, 3 and 4 (i.e. Individual Expert Reports) would undermine the protection of the decision-making process of the Commission and REA because these documents contain opinions for internal use as part of deliberations and preliminary consultations within the institutions concerned, even after the decision has been taken.

The individual opinions of the experts form an integral part of the decision-making process concerning the award of grants and their confidentiality is essential. It is therefore very important that the work of experts is protected from external pressure.

If these reports were disclosed to the public, even after the decision-making process has finished, the experts would be inclined to practice self-censorship and thus deprive REA and the Commission of their honest and unfettered views. This would have a negative effect on the quality of the debates during subsequent decision-making stages and, therefore, be detrimental to the reliability of the final decisions.

Consequently, I consider that the disclosure of the requested documents would prejudice the REA's margin of manoeuvre and, thus, undermine the integrity of the decision-making process of the Commission and REA concerning the evaluation procedures and the award of grants.

### III. OVERRIDING PUBLIC INTEREST

The exceptions laid down in Article 4(2), first indent, and Article 4(3), second subparagraph, of Regulation 1049/2001 must be waived if there is an overriding public interest in disclosure. Such an interest must, first, be public, and second, has to outweigh the damage caused by the release, i.e. it must outweigh the interests protected by virtue of Article 4(2), first indent, and Article 4(3), second subparagraph, of Regulation 1049/2001.

In this instance and in light of the conclusion of the judgment<sup>13</sup>, I consider that you have not presented sufficient elements demonstrating the existence of an overriding public interest in the disclosure of the requested documents.

### IV. CONCLUSION

In the light of the above, I have come to the conclusion that:

- **Full access** can be granted to Doc.9 - Ethics Summary Report, Doc.28 - Annex 4 - Model for the Financial statement, Doc.29 - Annex 5 - Model for the certificate on the financial statements, Doc.30 - Annex 6 - Model for the certificate on the methodology. Doc.33 - Commission Decision C(2016)2097.

- **Full access, with personal data expunged**, can be granted to Doc.6 – Result of evaluation of proposal/Invitation to grant preparation, Doc.10 to 22 - GA declarations submitted under GAP, Doc.39 - Deliverable D1.3 Ethics Advisor.

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<sup>13</sup> In paragraph 203 of the judgment the General Court concluded “*In the light of the foregoing considerations, it must be concluded that the applicant has not established the existence of an overriding public interest resulting from the taking into account of the various interests invoked, taken individually or taken together, which would justify disclosure to the public under the last limb of Article 4 (2) of Regulation No 1049/2001 of the information covered by the exception laid down in the first indent of Article 4(2) of that regulation.*” (unofficial translation).

- **Partial access** can be granted to: Doc.1 - Project proposal, Doc.5 - Consensus Report, Doc.7 Evaluation Summary Report (ESR), Doc.8 - Security Scrutiny Report, Doc.23 - Legal Financial Viability, Doc.24 and 25 - Annex 1 – description of the action (parts A and B), Doc.26 - Annex 2 –estimated budget of the action, Doc.27 - Annex 3 – accession forms, Doc.31 - Signed Grant Agreement, Doc.32 - Grant Agreement data sheet, Doc.34 - Comparison of project beneficiaries before and after grant preparation, Doc.35 - Full Grant Preparation Report, Doc.36 - Short Grant Preparation Report, Doc.37 - Deliverable D1.1 Ethics advisor's first report, Doc.38 - Deliverable D1.2 Ethics of profiling, the risk of stigmatization of individuals and mitigation plan, Doc.40 - Deliverable D2.1 Requirement Analysis Report, Doc.41 - Deliverable D2.2 Reference Architecture and components specifications, Doc.42 - Deliverable D2.3 EU wide legal and ethical review report.

- **Wider partial access** can be granted to: Doc.43 - Deliverable D3.1 Data Collection Devices – specifications, Doc.44 - Deliverable D7.3 Dissemination and communication plan, Doc.45 - Deliverable D7.8 Dissemination and communication plan 2.

- **No further access** is possible without undermining the interests described above because the expunged parts of the disclosed documents and the other requested documents (Doc.2, 3 and 4) are covered by the invoked exceptions to the right of public access.

Yours sincerely,

Marc TACHELET

Enclosures:

Annex 1 List of documents and ground for disclosure

1. H2020-BES-2015\_700626\_PROPOSAL
5. 700626-iCROSS-CR Consensus Report
6. Result of Evaluation of proposals / Invitation to grant preparation
7. 700626-iCROSS-ESR - Evaluation Summary Report
8. 700626-iCROSS-SEC-ESR - Security Scrutiny Report
9. EthSR-700626-iCROSS - Ethics Summary Report
10. Signed GA Declaration - GAP-700626 - 928014715
11. Signed GA Declaration - GAP-700626 - 928175832
12. Signed GA Declaration - GAP-700626 - 942993261
13. Signed GA Declaration - GAP-700626 - 943032352
14. Signed GA Declaration - GAP-700626 - 945958260
15. Signed GA Declaration - GAP-700626 - 947337891

16. Signed GA Declaration - GAP-700626 - 950910304
17. Signed GA Declaration - GAP-700626 - 954021676
18. Signed GA Declaration - GAP-700626 - 972052036
19. Signed GA Declaration - GAP-700626 - 999654356
20. Signed GA Declaration - GAP-700626 - 999847580
21. Signed GA Declaration - GAP-700626 - 999969509
22. Signed GA Declaration - GAP-700626 - 999981828
23. LFV for project
24. Annex 1 - Description of the action (part A)
25. Annex 1 - Description of the action (part B)
26. Annex 2 - Estimated budget of the action
27. Annex 3 - Accession Forms
31. Signed 'Grant Agreement-700626-iCROSS'
32. Grant Agreement Data Sheet
33. Commission Decision C(2016) 2097
34. Comparison of project beneficiaries before and after grant preparation
35. Full Grant Preparation Report
36. Short Grant Preparation Report
37. D1.1 Ethics advisor's first report
38. D1.2 Ethics of profiling, the risk of stigmatization of individuals and mitigation plan
39. D1.3 Ethics Advisor
40. D2.1 Requirement Analysis Report
41. D2.2 Reference Architecture and components specifications
42. D2.3 EU wide legal and ethical review report
43. D3.1 Data Collection Devices - specifications
44. D7.3 Dissemination and communication plan
45. D7.8 Dissemination and communication plan 2