D6.2 DATA MANAGEMENT PLAN I

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D6.1 DATA MANAGEMENT PLAN I

Fintech Investors Network and Ecosystem

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EXECUTIVE SUMMARY

This document called Data Management Plan is the first version of a living document that describes how the FINE project will handle personal data throughout the lifetime of the project. This includes:

How it will handle the processing of personal data and for what purposes.

The repository structure and access management process.

The datasets to be created and their corresponding capture, storage, utility and re-use, data sharing, archiving and preservation.

How the project is aligned with FAIR data principles.

Finally, the data management plan also includes considerations about the allocation of resources, data security and ethics.

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1   INTRODUCTION

This document was developed as part of the FINE project. It corresponds to deliverable D6.2 Data Management Plan I as referred in the Description of Action (DoA) – Annex 1 of the Grant Agreement (GA). It is included in WP6 Management and Quality Control.

The Data Management Plan (DMP) will support the management life cycle for all data that will be collected, processed or generated by FINE It covers how to make data findable, accessible, interoperable and reusable (FAIR), including the handling of data during and after the project, what data will be collected, processed or generated, what methodology and standards will be applied, whether data will be shared/made open access (and how) and, if any, what data will not be shared/made open access (and why), how data will be curated and preserved.

In addition, the DMP describes the responsibilities regarding data management and security.

The EU General Data Protection Regulation 2016/679 (GDPR) will be strictly followed in the practices of the FINE project. As described in this deliverable, and presented in the Grant Agreement, the FINE consortium is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. The FINE consortium is dedicated to safeguarding the personal information under our remit and providing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for the GDPR.

Whilst a Data Protection Officer (DPO) has been appointed by F6S generally, and such DPO will assist with the oversight of the project's DMP and implementation, data protection is the responsibility of the various partners generating data, and should be monitored by each institution's DPO or designated person responsible for compliance.

Each institution notes that the role of the DPO is to ensure compliance with data protection regulations, such as the General Data Protection Regulation (GDPR), and that personal data is collected, processed, and stored in a secure manner. The GDPR requires that the DPO is allowed to perform their functions independently and is provided the resources to carry out those tasks and access to personal data and processing operations. The designated DPO representing each institution involved in this project will have the following tasks and responsibilities:

- Cooperate in the establishment of common rules and requirements for the consortium data protection policy;

- Advise on the coordination of data protection processes and information among the partners involved in WP5, representing their own institution;

- As applicable to their institution, provide coordinated answers to third parties when addressed to the project as a whole;

- Provide their own institution with guidance on how to implement the privacy principles;

- Monitor compliance of their own institution with national data protection laws;

- Provide advice to their own institution regarding data protection impact assessments and monitoring;

- Cooperate with the supervisory authority for prior consultation when required by law pertaining to their own institution.

The FINE project will follow the ORD pilot principle "as open as possible, as closed as necessary". This means that it will make data accessible with as few limitations as possible, while protecting sensitive and personal data of the start-ups and project participants (ecosystem builders, corporations, investors, and others). The protection of data extends to Intellectual Property Rights (IPR) of the external participants start-ups and scaleups which are kept exclusively by them companies and teams. The protection of personal and privacy data is taken seriously by all consortium members, who shall follow this DMP during the project.

Relation with other project documents:

The Data Management Plan is related to the following documents:

Grant Agreement (GA): Contract between the consortium and the EC describing the description of action (DoA).

Consortium Agreement (CA): Contract between the consortium members defining internal provisions not mentioned in the Grant Agreement.

D6.1 Project Quality Manual: Living document specifying operation procedures such as internal communication channels, repository structure and access management, naming conventions, quality assurance procedures, and responsibilities.

1.1 STRUCTURE OF THE DELIVERABLE

The structure of the D6.2 Data Management Plan I is as follows:

• Section 2 describes the methodology that is followed for preparing the DMP and provides a general overview of the project's data management policy.

• Section 3 summarises the management plan for the various datasets created within FINE following the presented methodology.

• Section 4 summarises the management plan for the various non-research datasets created within FINE, following the presented methodology.

• Section 5 addresses the management plan for datasets not developed within the framework of FINE that will be used in one or more of the project activities.

• Section 6 summarises how the FINE project has addressed the ethical considerations flagged in the Grant Agreement Preparation phase of the project.

• Finally, Section 7 provides some final considerations to the deliverable.

2 FINE DATA MANAGEMENT METHODOLOGY, PROCEDURE AND DATA SET SUMMARY

The methodology used for the development of the deliverable considers the "Horizon Europe – Data Management Plan Template (version 1.0, 05 May 2021)." The FINE DMP addresses the following points:

- Data summary

- FAIR data

- Allocation of resources

- Data security

- Ethical aspects

- Personal data procedures

In the remainder of this section, it is briefly presented each of these points from a general perspective that is transversal to many datasets.

2.1 DATA SUMMARY

The processing of general data and personal data that may occur under FINE will be related to its use in project activities (and without prejudice of the fact that in many cases the relevant entities will be legal persons and, as such, the corresponding data used for such purposes will not constitute personal data). In summary, such activities include:

- **Promotion:** sending communications by email or other means to the professional contacts of the potential interested entities related to the relevant project activities (e.g. webinars, workshops, and other events).

- **Implementation of activities:** involving the participating entities (e.g., individuals, start-ups, organisations, associations, and others) in the FINE activities and contacting them for this purpose.

- **Impact assessment:** conducting feedback and impact assessment activities with the participant entities.

- **Dissemination of results:** producing media content, including with relation to the FINE activities, events, and results.

- **Logistics and administration:** implementing the necessary means for the organisation of project activities.

- **Identity and external platforms:** enrolment in platforms involved in delivering the project.

- **Reporting:** complying with any reporting obligations in relation to the EC under the project.

Relevant data for the delivery of the project will be collected, including personal data as required to execute project activities.The GDPR sets out the legal framework for processing personal data, this will be incorporated into the project's policies and procedures to ensure data protection compliance. Personal data collected will be processed based on the legal bases of consent and legitimate interests. All personal data processed throughout the lifetime of the project will be done so in line with the principles of the GDPR. Policies will be developed to ensure that there are clear procedures in place for the collection, storage, accuracy, security, retention and destruction of personal data.

No special category personal sensitive data (defined by Article 9 of the GDPR as "data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, (…) genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation") will be collected by the FINE project.

Data will be collected, depending on the purpose and method of collection in machine-readable, physical, and other formats.

Data will originate from multiple platforms, with different project partners responsible for the various platforms used in the delivery of the project. The project will map the platforms used in the delivery of the project to maintain a data management plan mapping. The project will not reuse any existing data unless the terms under which such data was originally supplied provide for such re-use.

The project is expected to generate data covering individuals and organisations, such as ecosystem organisations, investors, corporations, event attendees, etc. The data might be useful to researchers and other entities regarding mapping activities to growth outcomes, understanding the project's area of focus and those that seek to understand the impact of public funds on ecosystem growth.

2.2   FAIR DATA

2.2.1 MAKING DATA FINDABLE, INCLUDING PROVISIONS FOR METADATA

The data produced and used by the project will be largely discoverable with metadata, identifiable by participant name and/or organisation and in some cases, be indexable/findable using a persistent and unique actor key. The project will evaluate using the unique actor key across the multiple platforms that will be used in delivery of the project to enhance findability.

A part of the data, such as third parties regarding the matchmaking platform data, will be organised as structured data. One example is the use of regions, taxonomy of industries, start-up funding stage, and type of instruments present with applicants to the project matchmaking network. As another example, project data will be indexable chronologically with change and version control parameters.

Metadata used from the project will include (depending on the capabilities of each of the project's platforms):

- How data was created

- Time and date of creation or modification

- Source of data

- Who created data?

- Expected quality of data

Naming conventions will vary by platform used in the delivery of the project. Each platform typically maintains its own conventions, with such conventions not under the control of the project.

2.2.2 MAKING DATA OPENLY ACCESSIBLE

Although some most of the data used in the project will be personal, confidential, or proprietary, the project will work to make data openly accessible as possible. There are two specific categories of data where the project will endeavour to deliver on this goal:

Dissemination: Information that is relevant to promote the project, such as data on the FINE community, as well as testimonials and pictures/videos of the project activities, will be published on the FINE communication channels. The channels include websites and social media platforms and will be made available for the public for dissemination purposes. Of course, consent will be secured before any publication and this data may be shared based on such consent.

Participant Profile: The project will compile anonymised profile reports on specific project aspects (where such data is not subject to deanonymisation), such as the industries, funding stages or national origin of projects participants. This dataset may be shared without restriction as anonymised data.

No special tools other than standard web browsers, desktop text editors, spreadsheets and presentation software will be required for access to the data above. There is no source code that will be provided as part of the project.

FINE does not expect to need a data access committee.

2.2.3 MAKING DATA INTEROPERABLE

The FINE project will work to make data produced by the project interoperable to encourage, where applicable, any reuse and data exchange between external stakeholders. Data used in the project will be available on-line (browser), using mostly standard spreadsheet formats (Open Office, Excel, Google Sheets, etc.), using standard text editors (Open Office, Word, Google format) and using standard encoding and formatting to reduce the likelihood of incompatibility.

Many of the metadata and structured data types used by the project's platforms have become de facto standards. Wherever possible and within the control of the project, the project will choose to adopt open, free, and commonly used metadata and structured data types. If required, the project will consider providing mapping to commonly used structures that are not already supported by the project.

Selected FINE deliverables in **Public dissemination** level will use standard vocabulary and methodologies to facilitate interoperability and exchange among other business support organisations and investors ecosystems. The sustainability plan and the respective activities will ensure that it is possible to use the relevant FOODITY results and information after the project ends, while continuing to ensure data privacy.

2.2.4 INCREASE DATA RE-USE

The project will make data related to dissemination and other datasets available for re-use, if requested, and if it respects the principles of data protection. Selected datasets generated may not be made available due to FINE's commitments to its applicants in relation to personal information and business private information.

The information made available on the project website and other communication channels will be free for third parties to use. If files or datasets are produced, they will be shared to eligible third parties.

Data retention periods in FINE will be determined in line with the GDPR principles of 'data minimisation' and 'storage limitation'. Regarding the use of each platform employed in delivery of the project, the application of these principles will be determined by policies of each respective platform. Personal data collected by the project will be stored on the project's limited access repository as well as on each platform used, until the end of the project. The project is currently set to end in August 2025, with extension of retention through the conclusion of EC review. The project will retain data, including personal data processed by the FINE consortium members, if strictly needed, in accordance with the current terms needed to answer potential audits by the EC services, such as data that enables the assessment of the FINE activities' impact.

The project must retain generated data for five years after the balance of the project is paid or longer if there are ongoing procedures (such as audits, investigations, or litigation). In this case, the data must be kept until they end), and to the extent applicable, the potential processing of the relevant personal data for such purpose would be supported on the necessity of the consortium parties to comply with an applicable legal obligation to which such entities are subject to hereunder.

Notwithstanding the foregoing, any personal data may be deleted earlier if a data subject explicitly requests their records to be deleted and the applicable requirements to the exercise and execution of the right to erasure are fulfilled, F6S Data Protection Officer / GDPR Owner and data protection representatives can be contacted on email at dataprotection@f6s.com. To follow the principle of data minimisation, personal data will be deleted/destroyed in accordance with the applicable criteria and requirements resulting from the applicable personal data protection laws, namely, the GDPR.

2.3 ALLOCATION OF RESOURCES

Each partner in FINE is responsible for the application of the DMP for the data it contributes to the project repository SharePoint and data that is received, stored, modified, or deleted on a platform the project uses that is such partner's responsibility.

The project partners will maintain mapping on the platforms each partner uses in the project. The eight (8) consortium members have a responsibility towards ensuring a correct use of and management of data, in the tasks and Work Packages which they lead.

There are no additional costs to make data FAIR in the project, as the costs to operate each platform used in the project are already integrated into the project costs. The personnel costs described in the GA and related with WP6 Management and Quality Control and T6.3 Data Management consider data management activities.

2.4 DATA SECURITY

All consortium members must understand their data security obligations and responsibilities. Such procedures are defined in the present deliverable. There is a dedicated focus on privacy by design and the rights of individuals engaged in the project. Each partner organisation will take responsibility for the platforms which they contract and/or operate for the project. As mentioned, the project will maintain records on each platform that each organisation carries responsibility for under the project.

Each partner will review each of the platforms they use to deliver the project with regards to data security, data encryption, data retention, secure access, secure transfer, and the security of storage.

In sum, the FINE project will maintain protection of personal data and compliance with Data Regulations as per national and European legislation regarding the protection of personal data. Procedures will be in place for applicable technical means to avoid the loss, misuse, alteration, access by unauthorised persons and/or theft of the data provided to this entity. Notwithstanding, security measures (particularly for Internet accessible data) are not impregnable. To mitigate risk of unauthorised access, access controls will be applied to data sources. As an example, applications to the FINE project and feedback forms will be made accessible to a limited number of team members using user-level security and permissions.

FINE participants (data owners) will be able to exercise their right to be forgotten.

Breach procedures will be put in place by the consortium members to ensure that the partners are able to identify, assess, investigate, and report any reported or detected data breach at the earliest possible time.

Additionally, all consortium members will be asked to adopt security measures to protect computers, laptops, mobile phones, and similar tools to prevent unauthorised access in case of leaving the tool unattended or in case of loss or theft.

3   FINE DATASETS

The main type of datasets considered in FINE are project generated datasets. The datasets listed only refer to those immediately generated by the project (and does not include datasets that might be generated and/ or provided by individuals or other data providers).. The following list is not exhaustive and represents the datasets identified at M6 or considered to be developed during the project. Additional datasets may be created in the future depending on specific project needs.

Table 1 lists the datasets that are generated within the FINE project that will be used.

Table 1. Summary of datasets created and used within FINE.

DMP component (dataset)	Short Summary	Related WP
Country ecosystem mapping	Contains data about the Fintech ecosystem by country of interest (Malta, France, Netherlands, Ireland, Romania, Spain, Greece, Cyprus, Hungary, Bulgaria).	WP1
Investor Knowledgebase	Contains data on country mapping, market trends and regulatory framework by country of interest (Malta, France, Netherlands, Ireland, Romania, Spain, Greece, Cyprus, Hungary, Bulgaria).	WP1
Matchmaking platform	Contains data collected during the matchmaking platform application process related to the applications to the FINE network and communications with applicants.	WP5
Project website and social media	Contains information about content created by FINE consortium published in the website or the project's social media channels.	WP5
Newsletter subscribers	Contains information about the subscribers to the FINE Newsletter.	WP5
Focus groups	Contains information about the participants and results from the focus groups with stakeholders	WP5

Stakeholder workshops	Contains information and results from the validation workshop with stakeholders.	WP5
Webinars and video recording	Contains recorded information about webinar organisers and participants.	WP5
Events registration and participation	Contains information about the events (online, hybrid, in-person) organized by FINE consortium.	WP5
External communication with third parties	Contains information about communication actions with third parties on one or more of the planned activities.	WP5

3.1 APPLICABLE DATASET INFORMATION TEMPLATE

To ensure – to the extent possible – consistent collection and presentation of the data management of the various datasets associated with FINE, Table 2. A table template has been prepared.

Table 2. Template for the data management plan of a specific dataset.

DMP component	FINE_ WPX_ DatasetTitle_Version Partner: Short name of partner processing this data
Data summary	Purpose: Short description of data + What is the purpose of data collection/generation (and its relation to project objectives) in the context of FINE. Type/format: What is the type/format of the data? Re-use of existing data: Are you re-using an existing dataset and how? Data origin: What is the origin/source of the data? Expected size: What is the expected data/dataset size? Data utility: To whom will this data be useful and how? (inside the project and also to third parties, if applicable)

Making data findable, incl. provisions for metadata	<u>Is data discoverable:</u> Are the data produced and/or used in the project discoverable with metadata, identifiable and locatable by means of a standard identification mechanism (e.g., persistent, and unique identifiers such as Digital Object Identifiers)? <u>Search keywords:</u> Will search keywords be provided that optimize possibilities for re-use? <u>Versioning:</u> Do you provide clear version numbers? <u>Metadata creation:</u> Specify standards for metadata creation (if any). If there are no standards in your discipline, describe what type of metadata will be created and how.
Making data openly accessible	<u>Data openly accessible:</u> Will data produced and/or used in the project be made openly available as the default? If certain datasets cannot be shared (or need to be shared under restrictions), explain why, clearly separating legal and contractual reasons from voluntary restrictions. <u>How it will be accessible:</u> How will the data be made accessible (e.g., by deposition in an open repository)? <u>Methods/software tools to access data:</u> What methods or software tools are needed to access the data? Also, is documentation about the software needed to access the data included? Is it possible to include the relevant software (e.g., in open-source code)? <u>Repository:</u> Where will the data and associated metadata, documentation and code be deposited? Preference should be given to certified repositories which support open access where possible. <u>Restrictions on access:</u> If there are restrictions on use, how will access be provided?
Making data interoperable	<u>Interoperability:</u> Are the data produced in the project interoperable, that is allowing data exchange and re-use between researchers, institutions, organisations, countries, etc. (i.e., adhering to standards for formats, as much as possible compliant with available (open) software applications, and in particular facilitating re-combinations with different datasets from different origins)? <u>Data and metadata vocabularies:</u> Specify what data and metadata vocabularies, standards, or methodologies you will follow to facilitate interoperability. <u>Use of standard vocabularies:</u> Specify whether you will be using standard vocabulary for all data types present in your data set, to allow inter-disciplinary interoperability?

	Mappings to commonly used vocabularies: In case it is unavoidable that you use uncommon or generate project specific ontologies or vocabularies, will you provide mappings to more commonly used ontologies?
Increase data re-use	**Licence:** Specify how the data will be licensed to permit the widest reuse possible. E.g., Open Data License (Creative Commons CC Zero License, Creative Common Attribution License-CC-BY v4.0, etc.). **Availability for re-use:** When will data be made available for re-use. If applicable, specify why and for what period a data embargo is needed. **Usable by third parties after end of project:** Specify whether the data produced and/or used in the project is useable by third parties, in particular after the end of the project? If the re-use of some data is restricted, explain why. **Re-use timeframe:** Specify the length of time for which the data will remain re-usable. **Data quality assurance process:** Describe data quality assurance processes
Allocation of resources	**Costs for making data FAIR:** Estimate the costs for making your data FAIR. Describe how you intend to cover these costs. **Costs for long-term preservation:** Describe costs and potential value of long-term preservation.
Data security	**Security measures:** Security measures implemented for data protection (including controlled access, user authentication, firewalls, VPNs, encryption, back-ups, etc.).
Ethical aspects	**Possible ethical and legal aspects preventing sharing:** Are there any ethical or legal issues that can have an impact on data sharing? **Is informed consent for data sharing and long-term preservation given:** Is informed consent for data sharing and long-term preservation included in questionnaires dealing with personal data?
Other issues	Refer to other national/funder/sectorial/departmental procedures for data management that you may be using (if any).

3.2 COUNTRY ECOSYSTEM MAPPING DATASET

Table 3. Description of the Country Ecosystem Mapping dataset

DMP component	FINE_1_WP1_Country Ecosystem Mapping_V1 Partner: Truffle Capital
Data summary	Purpose: During the first's months, the consortium has been working to collect data on both country fintech ecosystems and investors. In addition, over 170 investors all over Europe have been mapped and will be contacted in the future steps. As this is a first milestone, the objective is to increase the number of investors and to go in-depth into the ecosystem activities to track them out and be helpful for the Eu fintech community. Type/format: Excel file (.xlsxs) Re-use of existing data: No Data origin: Several sources, most of them are institutional websites and funds/investor websites and interviews. Notably, for ecosystem we used national newspapers and fintech related websites as sifted.com and mindfintech. Expected size: Unknown. Data utility: Data will be useful for internal fine partners to scout potential new investors and to third party users to navigate the ecosystem of Eu countries and look for new institutional investors to partner with.
Making data findable, incl. provisions for metadata	Is data discoverable: The data will be stored in the project repository or similar platform. It will be discoverable only by registered users with metadata, identifiable by investor name and/or organisation and in some cases, be indexable/findable using a persistent and unique actor key. Search keywords: Yes, the users can look for keywords by using the shortcut Ctrl + F. Versioning: No. Metadata creation: No.
Making data openly accessible	Data openly accessible: Only public data will be shared with stakeholders. GDPR compliant measure will be taken to protect names and personal contact data.

	How it will be accessible: The data will be accessible via the FINE website. Methods/software tools to access data: Web browser. Repository: No. Restrictions on access: No restrictions.
Making data interoperable	Interoperability: No Data and metadata vocabularies: N/A Use of standard vocabularies: Use of standard vocabulary Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A Availability for re-use: Data collected will be available during project lifetime on the project's website. Usable by third parties after end of project: In compliance with Grant Agreement for 5 years after project completion on the project's website. Re-use timeframe: 7 years Data quality assurance process: Completeness and conformity of the data will be in charge of task leader Truffle Capital (TC) and supervised by the project Data Manager (F6S).
Allocation of resources	Costs for making data FAIR: N/A Costs for long-term preservation: N/A
Data security	Security measures: Ensuring data security and compliance with European regulations, FINE website will employ robust measures to prevent data loss, unauthorized access, and misuse. While recognizing that no security is unbreakable, access controls, such as user-level security and permissions, will restrict data access to authorized team members.
Ethical aspects	Possible ethical and legal aspects preventing sharing: No Is informed consent for data sharing and long-term preservation given: N/A

Other issues	N/A

3.3 INVESTOR KNOWLEDGEBASE DATASET

Table 4. Description of the Investor Knowledgebase dataset

DMP component	FINE_1_WP1_Investor Knowledgebase_V1 **Partner: Truffle Capital**
Data summary	Purpose: During the first's months, the consortium has been working to collect data on both country fintech ecosystems and investors. After a first review, on the ecosystem side, more than 250 events, trends and specific policies were highlighted by the consortium in the targeted countries. Type/format: Excel file (.xlsxs) Re-use of existing data: No Data origin: Several sources, most of them are institutional websites and funds/investor websites and interviews. Notably, we used websites as Pitchbook.com and crunchbase to source the funds. Expected size: 1GB. Data utility: Data will be useful for internal fine partners to scout potential new investors and to third party users to navigate the ecosystem of Eu countries and look for new institutional investors to partner with.
Making data findable, incl. provisions for metadata	Is data discoverable: N/A Search keywords: Yes, the users can look for keywords by using the shortcut Ctrl + F. Versioning: No. Metadata creation: N/A
Making data openly accessible	Data openly accessible: Only public data will be shared with stakeholders. GDPR compliant measure will be taken to protect names and personal contact data.

	How it will be accessible: Project website.
	Methods/software tools to access data: No restrictions
	Repository: Project website.
	Restrictions on access: No restrictions
Making data interoperable	Interoperability: No
	Data and metadata vocabularies: N/A
	Use of standard vocabularies: Use of standard vocabulary
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A
	Availability for re-use: Data collected will be available during project lifetime on the project's website.
	Usable by third parties after end of project: In compliance with Grant Agreement for 5 years after project completion on the project's website.
	Re-use timeframe: 7 years
	Data quality assurance process: Completeness and conformity of the data will be in charge of task leader Truffle Capital (TC) and supervised by the project Data Manager (F6S).
Allocation of resources	Costs for making data FAIR: N/A
	Costs for long-term preservation: N/A
Data security	Security measures: Ensuring data security and compliance with European regulations, FINE website will employ robust measures to prevent data loss, unauthorized access, and misuse. While recognizing that no security is unbreakable, access controls, such as user-level security and permissions, will restrict data access to authorized team members.
Ethical aspects	Possible ethical and legal aspects preventing sharing: N/A
	Is informed consent for data sharing and long-term preservation given: N/A

Other issues	N/A

3.4 MATCHMAKING PLATFORM DATASET

Table 5. Description of the Matchmaking platform dataset

DMP component	**FINE_3_WP5_Matchmaking Platform_V1** **Partner: F6S**
Data summary	Purpose: The FINE Matchmaking Network applications datasets will include data collected during the application process. It will contain: • City and country • Gender • Type of investor • Target regions • Ticket size range • Industry sector • Funding stage • Type of instrument Type/Format: The data will be collected and stored in structured digital format. It may include textual information such as individual and company profiles, as well as geographical location and other metrics. The format will primarily be electronic, with the data being entered and managed in the F6S platform Data origin: It will be provided by the individuals/companies or their representatives, who will enter the information into the F6S platform. Expected size: Unknown. Data utility: Data collected will be used by consortium members to perform the matchmaking of the investor's submitted applications and to decide whether they should be selected to participate in FINE Network. The dataset will also be used to generate statistics and reports about the FINE project as requested by the GA, which will be aggregated or anonymised

	data that will not compromise personal details of applicants nor any other confidential information about their projects.
Making data findable, incl. provisions for metadata	Is data discoverable: The data will be stored in the project repository or similar platform. It will be discoverable only by registered users with metadata, identifiable by investor name and/or organisation and in some cases, be indexable/findable using a persistent and unique actor key. Search keywords: N/A Versioning: One version. Metadata creation: Collected information will be organised as structured data. Metadata used will include: • How data was created • Time and date of creation or modification • Source of data. • Who created data. • Expected quality of data.
Making data openly accessible	Data openly accessible: Raw data will not be openly accessible due to FINE's commitments to its applicants in relation to personal information and business private information. However, anonymised, or aggregated data from the network participation may be made public. How it will be accessible: The collected raw data will be stored in the project repository or a similar platform, only accessible to those partners with direct management of the applications and respective information. A dataset including anonymised or aggregated data from the participation will be made public in a public repository (i.e., project website) in the form of a non-editable document). Methods/software tools to access data: Download files via web browser. Repository: The collected data will be stored in the project repository or a similar platform. A dataset including anonymised or aggregated data from the participation will be made public in a public repository like the project website. Restrictions on access: Given the confidential nature of the information, access will be restricted to only those required for managing the data.
Making data interoperable	Interoperability: Yes, effort will be made so that the data is interoperable. Data and metadata vocabularies: Data will be available using standard spreadsheet formats (Open Office, Excel, Google Sheets, etc.), using

	standard text editors (Open Office, Word, Google Docs, etc.) and using standard encoding and formatting to reduce the likelihood of incompatibility.
	Use of standard vocabularies: N/A
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: The dataset will not be made openly available due FINE's commitments to its applicants in relation to personal information and business private information.
	Availability for re-use: No
	Usable by third parties after end of project: No
	Re-use timeframe: N/A
	Data quality assurance process: Completeness and conformity of the application exports is ensured by the leader of the process and the person responsible for performing the quality check. Completeness and conformity of the data, including communications with applicants, is ensured by the Data Manager (F6S) as they will have to check all process documents to approve final selection.
Allocation of resources	Costs for making data FAIR: There are no additional costs to make data FAIR in the project, as the costs to operate each platform used in the project are already integrated into the project costs.
	Costs for long-term preservation: N/A
Data security	Security measures: FINE will maintain protection of personal data and compliance with Data Regulations as per national and European legislation regarding the protection of personal data. Procedures will be in place for applicable technical means to avoid the loss, misuse, alteration, access by unauthorised persons and/or theft of the data provided to this entity. Notwithstanding, security measures (particularly for Internet accessible data) are not impregnable. To mitigate risk of unauthorised access, access controls will be applied to data sources. As an example, applications to the FINE project network will be made accessible to a limited number of team members using user-level security and permissions.
	FINE participants (data owners) will be able to exercise their right to be forgotten.
Ethical aspects	Possible ethical and legal aspects preventing sharing: Due to ethical or legal concerns the raw data will not be made openly available due FINE's commitments to its applicants in relation to personal information and

	business private information. Only anonymised or aggregated data from the participation will be made public.
	Is informed consent for data sharing and long-term preservation given: The applicants will provide their informed consent for the collection and processing of their personal data in the context of FINE. The data will not be shared outside the consortium.
Other issues	N/A

3.5 PROJECT WEBSITE AND SOCIAL MEDIA DATASET

Table 6. Description of the Project website and social media dataset

DMP component	FINE_4_WP5_Website and social media_V1 Partner: F6S
Data summary	Purpose: The project partners will run and manage a project website and social media platforms to raise awareness about the project, engage stakeholders, and disseminate information and results. Anonymous statistical information about the visitors to the website and users' engagement with social media will be collected. Type/Format: Standard text editors (Open Office, Word, Google Docs, etc.) Data origin: The project website will be set up to provide statistics that will be collected using a web analytics service. Only anonymised data will be collected that can not be tracked back to a specific individual. Social media platforms include their own analytics services that will be used to collect and provide information about user engagement on these platforms. Expected size: Unknown. Data utility: The dataset generated will be used by consortium members to analyse visitors and users' engagement with the project via the website and social media, and to adjust the existing strategy to improve engagement.
Making data findable, incl. provisions for metadata	Is data discoverable: Yes Search keywords: FINE, Fintech, News, Updates, Insights

	Versioning: No
	Metadata creation: No
Making data openly accessible	Data openly accessible: In order to allow for a more thorough and varied analysis, data will remain stored on the analytics platforms. If relevant, data may be exported to the project's documentation repository to enable access by consortium members. Data will be stored separately, divided into the website and relevant social media platforms.
	How it will be accessible: Analytics platforms.
	Methods/software tools to access data: Google Analytics; Other analytics platforms
	Restrictions on access: Data sharing is not applicable for this dataset. Information extracted from the dataset will be made available via official reports.
Making data interoperable	Interoperability: Data exported to the project's documentation repository will be stored using a common naming convention to ensure easy access by consortium members. Whenever possible, data will be exported regularly (e.g. fortnightly, monthly) and consistently in terms of indicators. The task leader will verify that the dataset is exported regularly and that it is consistent in terms of indicators.
	Data and metadata vocabularies: N/A
	Use of standard vocabularies: N/A
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A
	Availability for re-use: This dataset will be used to generate statistics and reports about visitors and users, which will be aggregated or anonymized data that will not compromise personal details of the participants nor any other confidential information. This information will not be re-used outside of the project.
	Usable by third parties after end of project: N/A
	Re-use timeframe: N/A
	Data quality assurance process: N/A

Allocation of resources	Costs for making data FAIR: There are no additional costs to make data FAIR in the project, as the costs to operate each platform used in the project are already integrated into the project costs.
	Costs for long-term preservation: N/A
Data security	Security measures: Ensuring data security and compliance with European regulations, FINE website and social media channels will employ robust measures to prevent data loss, unauthorized access, and misuse. While recognizing that no security is unbreakable, access controls, such as user-level security and permissions, will restrict data access to authorized team members.
Ethical aspects	Possible ethical and legal aspects preventing sharing: N/A
	Is informed consent for data sharing and long-term preservation given: FINE Privacy policy and Terms of use on the website.
Other issues	N/A

3.6   NEWSLETTER DATASET

Table 7. Description of the Newsletter dataset

DMP component	**FINE_5_WP5_Newsletter_V1** **Partner: F6S**
Data summary	Purpose: The purpose of this database is to store the data of the subscribers to the FINE Newsletter.
	Type/Format: The data will be collected and stored in structured digital format. This dataset will include the first name and email of each subscriber.
	Data origin: Subscription link at the FINE website and social media channels.
	Expected size: The exact size cannot be determined in advance. The dataset's size will depend on the number people that subscribe. The data will be used to send the FINE Newsletter, with updated information on the project developments and opportunities.

	Data utility: The data will be used to send the FINE Newsletter, with updated information on the project developments and opportunities
Making data findable, incl. provisions for metadata	Is data discoverable: No Search keywords: No Versioning: No Metadata creation: No
Making data openly accessible	Data openly accessible: N/A How it will be accessible: N/A Methods/software tools to access data: N/A Repository: Mailchimp (platform compliant with all data and GDPR regulations: https://mailchimp.com/es/legal/terms/) Restrictions on access: N/A
Making data interoperable	Interoperability: N/A Data and metadata vocabularies: N/A Use of standard vocabularies: N/A Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A Availability for re-use: N/A Usable by third parties after end of project: N/A Re-use timeframe: N/A Data quality assurance process: N/A
Allocation of resources	Costs for making data FAIR: There are no additional costs to make data FAIR in the project, as the costs to operate each platform used in the project are already integrated into the project costs. Costs for long-term preservation: N/A

Data security	Security measures: Data is stored on the Mailchimp platform (compliant with all data and GDPR regulations: https://mailchimp.com/es/legal/terms/)
Ethical aspects	Possible ethical and legal aspects preventing sharing: N/A Is informed consent for data sharing and long-term preservation given: N/A
Other issues	N/A

3.7 FOCUS GROUPS DATASET

Table 8. Description of Focus Groups Dataset

DMP component	FINE_6_WP5_Focus Groups_V1 Partner: F6S
Data summary	Purpose: Qualitative analysis to identify critical issues in relation to fintech investment ecosystem in Europe. Type/format: Audio format (.mp3), Word document (transcription). Re-use of existing data: No Data origin: Interviews Expected size: ~35 Mb per interview. Data utility: Internal use.
Making data findable, incl. provisions for metadata	Is data discoverable: Analysis of interviews will be provided on project repository. Search keywords: N/A Versioning: N/A Metadata creation: N/A
Making data openly accessible	Data openly accessible: The analysis of interviews will be openly accessible. Interview recordings and transcripts are restricted, because

	interviewees can easily be tracked and the necessary anonymity cannot be guaranteed, as the interviewees talk about their unique experience.
	How it will be accessible: Analysis will be on project repository
	Methods/software tools to access data: No specific software needed.
	Repository: Project repository
	Restrictions on access: N/A
Making data interoperable	Interoperability: N/A
	Data and metadata vocabularies: N/A
	Use of standard vocabularies: N/A
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A
	Availability for re-use: N/A
	Usable by third parties after end of project: N/A
	Re-use timeframe: N/A
	Data quality assurance process: N/A
Allocation of resources	Costs for making data FAIR: N/A
	Costs for long-term preservation: N/A
Data security	Security measures: The raw data and transcript of interviews as well as personal keys stored on Finance Innovation server – project repository owners, which meets the necessary security standards. All data will be deleted after project ends.
Ethical aspects	Possible ethical and legal aspects preventing sharing: Interview partners will be asked for informed consent. The research team will agree with interviewees that, raw data of interviews will not be shared.
	Is informed consent for data sharing and long-term preservation given: No, only for analytical purposes.
Other issues	N/A

3.8 STAKEHOLDER WORKSHOPS DATASET

Table 9. Description of Stakeholders Workshop Dataset

DMP component	FINE_7_WP5_Stakeholders workshops_V1 Partner: F6S
Data summary	Purpose: Dissemination workshop of project objectives and activities Online, hybrid or physical. Type/format: Miro boards, paper templates Re-use of existing data: No Data origin: Workshop Expected size: N/A Data utility: Internal use.
Making data findable, incl. provisions for metadata	Is data discoverable: No Search keywords: N/A Versioning: N/A Metadata creation: N/A
Making data openly accessible	Data openly accessible: The results of the workshop will be openly accessible in project repository, website, and social media. How it will be accessible: Results will be on project repository, website, and social media. Methods/software tools to access data: No specific software needed. Repository: Project repository, website, and social media. Restrictions on access: N/A
Making data interoperable	Interoperability: N/A Data and metadata vocabularies: N/A Use of standard vocabularies: N/A

	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A Availability for re-use: N/A Usable by third parties after end of project: N/A Re-use timeframe: N/A Data quality assurance process: N/A
Allocation of resources	Costs for making data FAIR: N/A Costs for long-term preservation: N/A
Data security	Security measures: Participant list is stored on Finance Innovation server – Owners of the project repository, which meets the necessary security standards. All data will be deleted after project ends.
Ethical aspects	Possible ethical and legal aspects preventing sharing: No ethical or legal issues, as only workshop results will be shared. Participation is anonymous. Is informed consent for data sharing and long-term preservation given: No, only for analytical purposes.
Other issues	N/A

3.9   WEBINARS AND VIDEO RECORDINGS DATASET

Table 10. Description of Webinars and Video recordings Dataset

DMP component	**FINE_8_WP5_Webinars and Video recordings_V1** **Partner: F6S**
Data summary	Purpose: The project will organise and run one or more webinars that may be recorded for and manage a project website and social media channels

to raise awareness about the project, engage stakeholders, and disseminate information and results.

Type/format: Standard video format (.mp4; .mov; etc.)

Re-use of existing data: No

Data origin: Webinars and other activities will be recorded with video in the following cases:

- Participants have been informed and able to withdraw consent to be recorded for the purpose of the webinar/ activity.

- Recording is necessary to fulfil the objectives of the project.

- Recording is in the public interest or is in the interests of the recorder, unless those interests are overridden by the interests of the participants that require protection of personal data.

If one of the above-mentioned cases is applicable, all participants of the webinar or activity that will be recorded will be informed at the start that such recording will take place. The following information will be disclosed to the participants:

- Confirmation the webinar/ activity will be recorded.

- Justification of the reason for the recording.

- Request consent for the recording: individuals who do not consent to the recording can still participate in the webinar/ activity. They can do this by turning off their camera and hiding/removing their name from the recording session so they can remain anonymous.

In the process of recording, the following will be considered:

- If at any time there is a need to protect sensitive data, the recording will be paused/ stopped.

- Any part of the recording that contains sensitive data will be erased.

- Recordings with sensitive data will be marked as such.

Expected size: N/A

Data utility: The collected data in the webinars and video recording will be used by the FINE consortium to promote the project's activities through communication and dissemination actions.

Making data findable, incl.	Is data discoverable: Yes Search keywords: FINE Webinar, Video, Recording

provisions for metadata	Versioning: N/A
	Metadata creation: N/A
Making data openly accessible	Data openly accessible: Webinars and other video recordings will be stored on the project's repository and/or public platforms.
	All files sent to the repository must comply with the locations, names and permissions as defined in the D6.1 Project Quality Manual.
	How it will be accessible: Webinars and other video recordings may be shared and made publicly available through the project website or a public platform.
	Methods/software tools to access data: No specific software needed.
	Repository: Project repository, website, and social media.
	Restrictions on access: N/A
Making data interoperable	Interoperability: N/A
	Data and metadata vocabularies: N/A
	Use of standard vocabularies: N/A
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A
	Availability for re-use: Webinars and other video recordings may be used by the consortium members for dissemination purposes or to increase external engagement in the project.
	Usable by third parties after end of project: N/A
	Re-use timeframe: N/A
	Data quality assurance process: N/A
Allocation of resources	Costs for making data FAIR: N/A
	Costs for long-term preservation: N/A
Data security	Security measures: Participant list is stored on Finance Innovation server – Owners of the project repository, which meets the necessary security standards. All data will be deleted after project ends.

Ethical aspects	Possible ethical and legal aspects preventing sharing: Obtaining informed consent from participants, respecting data privacy and accessibility, upholding intellectual property rights, ensuring content accuracy, and promoting cultural sensitivity. Legally, compliance with data protection regulations, intellectual property laws, cybersecurity measures, and adherence to open access requirements is crucial. Transparency regarding data retention, deletion policies, and potential conflicts of interest is essential. Is informed consent for data sharing and long-term preservation given: The applicants will provide their informed consent for the collection and processing of their personal data in the context of FINE.
Other issues	N/A

3.10 EVENTS REGISTRATION AND PARTICIPATION DATASET

Table 11. Description of Events registration and participation Dataset

DMP component	**FINE_9_WP5_Events registration and participation_V1** **Partner: F6S**
Data summary	Purpose: Participant registration for an event will be done using an online registration form or in-person at the event. The information collected will be the same independently of the registration being on or offline. Information collected will be the minimum needed to generate statistics regarding participation at the event. When relevant, consent for usage of participants' image and audio in dissemination actions will also be collected. Participant registration will be collected for every event run in the project. Type/format: File formats compatible with Microsoft Excel (.xls; .xlxs; .csv) Re-use of existing data: No Data origin: Online and physical events Expected size: N/A Data utility: Internal use.
Making data findable, incl.	Is data discoverable: No

provisions for metadata	Search keywords: N/A Versioning: N/A Metadata creation: N/A
Making data openly accessible	Data openly accessible: The events registration data will be accessible only to consortium members. How it will be accessible: Registration and participation files will be on project repository Methods/software tools to access data: No specific software needed. Repository: Project repository, website, and social media. Restrictions on access: N/A
Making data interoperable	Interoperability: N/A Data and metadata vocabularies: N/A Use of standard vocabularies: N/A Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A Availability for re-use: The registration dataset will be used by consortium members to increase participants' engagement in the project. It will also serve to generate aggregated or anonymized statistics and reports about the participants. Upon specific consent by the registrants, the dataset may be used to communicate other events or initiatives organised by the FINE or other projects that pursue a similar objective. Usable by third parties after end of project: N/A Re-use timeframe: N/A Data quality assurance process: The task leader is responsible for verifying that all required information is provided by participants, that it is stored and that instructions in the informed consents are enforced.
Allocation of resources	Costs for making data FAIR: N/A Costs for long-term preservation: N/A

Data security	Security measures: Participant list is stored on Finance Innovation server – Owners of the project repository, which meets the necessary security standards. The FINE consortium must retain generated data until five years after the balance of the project is paid or longer if there are ongoing procedures (such as audits, investigations, or litigation). In this case, the data must be kept until they end.
Ethical aspects	Possible ethical and legal aspects preventing sharing: No ethical or legal issues. Is informed consent for data sharing and long-term preservation given: No, only for analytical purposes.
Other issues	N/A

3.11 EXTERNAL COMMUNICATION WITH THIRD PARTIES DATASET

Table 12. Description of External communication with third parties dataset

DMP component	**FINE_10_WP5_External communication with third parties_V1** **Partner: F6S**
Data summary	Purpose: The project partners will engage and communicate with third parties throughout the project on one or more of the planned activities. Communication and Information exchange between the partners and third parties will be carried out through one or more different platforms and may include e-mail, the F6S platform, or other communication platforms. Type/format: .PDF Re-use of existing data: No Data origin: E-mail, F6S platform, or other communication platforms. Expected size: N/A Data utility: Internal use
Making data findable, incl.	Is data discoverable: No Search keywords: N/A

provisions for metadata	Versioning: N/A
	Metadata creation: N/A
Making data openly accessible	Data openly accessible: The information collected will only be available for FINE consortium members. Data sharing is not applicable for this dataset.
	How it will be accessible: Project repository
	Methods/software tools to access data: No specific software needed.
	Repository: Project repository
	Restrictions on access: N/A
Making data interoperable	Interoperability: N/A
	Data and metadata vocabularies: N/A
	Use of standard vocabularies: N/A
	Mappings to commonly used vocabularies: N/A
Increase data re-use	Licence: N/A
	Availability for re-use: The dataset will be used primarily to enable access to information and documentation by consortium members involved in activities. With exemption to the third parties involved, no other third parties will use the information and documentation contained in the data set.
	Usable by third parties after end of project: N/A
	Re-use timeframe: N/A
	Data quality assurance process: Information and documentation of interest that is exported to the project's documentation repository will be stored using a common naming convention to ensure easy access by consortium members. The task leader will verify that the information and documentation is consistent in terms of its naming and organisation within the repository.
Allocation of resources	Costs for making data FAIR: N/A
	Costs for long-term preservation: N/A
Data security	Security measures: Information about communication actions regarding third parties is stored on Finance Innovation server – Owners of the project repository, which meets the necessary security standards. The FINE

	consortium must retain generated data until five years after the balance of the project is paid or longer if there are ongoing procedures (such as audits, investigations, or litigation). In this case, the data must be kept until they end.
Ethical aspects	Possible ethical and legal aspects preventing sharing: No ethical or legal issues. Is informed consent for data sharing and long-term preservation given: No, only for internal purposes.
Other issues	N/A

4 ETHICAL ASPECTS

While no ethics issues apply to the FINE project, as stated in the DoA and GA, ethics will be taken into consideration in the way data is collected, stored and regarding who can visualise and use it. The project will work to ensure that management of personal data is compliant with GDPR and other applicable legal frameworks related to personal data protection. During the project, each partner will consider the standards, treaties and laws regarding data protection and privacy in both EU and national level legislation.

Consent documents regarding the project activity are stored on the project repository and are only available to the consortium. In addition when participants wish to remain anonymous in project dissemination materials, their identity will be anonymised for purposes of these materials in line with their wishes.

FINE has committed to be inclusive and to respect gender balance and will seek to present gender-related data in line with legal requirements.

FINAL CONSIDERATIONS

The present deliverable is the Data Management Plan (DMP) of the FINE project. It is the first of two DMP, the second to be delivered at M24 of the project.

The objective of this deliverable has been to describe the project's approach and adopted methodology for data management in the project. The DMP has provided a review of the main elements of data management that will be adopted by the FINE partners regarding the datasets that will be generated by the project.

The DMP has identified and detailed the initial datasets of the FINE consortium. The FINE datasets are expected to evolve over the course of the project. Therefore, the DMP is also a living document that will be updated during the project lifetime.

In the second iteration of the deliverable, further information and details will be provided regarding the management of data.