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<td>WP number</td>
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<td>Lead Beneficiary</td>
<td>IIASA</td>
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<tr>
<td>Deliverable Due Date</td>
<td>31/03/2023</td>
</tr>
<tr>
<td>Actual Delivery Date</td>
<td>31/03/2023</td>
</tr>
<tr>
<td>Nature of the Deliverable</td>
<td>R – Report</td>
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<tr>
<td>Dissemination Level</td>
<td>PU - Public</td>
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**Document History**

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1. Introduction

Scope and purpose of this report

This report serves as a guide for addressing the ethical considerations that may arise from the implementation of the NATURANCE project and outlines the approach adopted by the consortium partners. The aim of this report is to guarantee that the project’s actions are carried out in a responsible, honest, and transparent manner. IIASA and CMCC have collaborated to create a list of ethical considerations that are likely to have a significant impact on the coordination and support activities of the project. This list has been shared with the consortium partners, and as a result, the procedures outlined in this report will be carefully monitored and managed by the project’s Management Board.

What is the purpose of the NATURANCE project?

The NATURANCE aims to investigate the feasibility and effectiveness of solutions that combine disaster risk financing and investments with nature-based solutions, both technically and financially. The project seeks to facilitate conversations, share knowledge, and encourage mutual learning among various policy and practice areas. The project’s objective is to provide a comprehensive and collaborative evaluation of nature-based insurance and investment solutions from both societal and business perspectives and to promote the adoption of jointly developed principles, performance metrics, and recommended approaches for analysis and design. These recommendations align with the EU’s sustainable finance framework. The ultimate goal is to encourage the adoption of these principles and approaches to promote sustainable and nature-based solutions for disaster risk financing and investment.

Ethical concerns related to nature-based solutions

Nature-based solutions (NbS) refer to the use of natural processes and ecosystems to address environmental and social challenges, such as climate change, biodiversity loss, and flood risk. While NbS are generally considered to be environmentally beneficial, they also raise ethical concerns that need to be addressed to ensure their implementation is just and equitable. One of the ethical concerns associated with NbS is the possible displacement of vulnerable populations, particularly in urban areas, where the implementation of green infrastructure may lead to gentrification and the displacement of low-income residents. Allocation of resources for NbS may also be subject to ethical considerations. For instance, the prioritization of certain NbS projects over others may exacerbate existing power imbalances and inequalities. Ethical concerns also arise around the potential for greenwashing or the use of NbS as a marketing tool without actually addressing the underlying environmental and social issues. It is important to ensure that NbS are implemented in a transparent and accountable manner, with measurable outcomes and clear benefits for the environment and local communities. The involvement and participation of local communities in the planning and
implementation of NbS projects are essential to ensure that their rights and interests are considered.

Ethical issues surrounding the use of insurance as a means of promoting ecosystem preservation

Insurance can play an important role in protecting nature and ecosystems by incentivizing sustainable practices, supporting conservation and restoration efforts, and providing financial protection against environmental risks. Insurance companies can offer policies that incentivize environmentally friendly behaviour by providing discounts or lower premiums for businesses and individuals that take steps to reduce their impact on the environment. Insurance can provide financial support for conservation and restoration efforts. Insurance-linked investments can help fund nature-based solutions such as reforestation, wetland restoration, and other projects that can provide multiple benefits, including reducing carbon emissions and protecting ecosystems. There are several ethical aspects related to how nature-based insurance and investment solutions are implemented and these need to be carefully considered and addressed. Firstly, the practice of risk selection means that insurance companies may only provide coverage to certain valuable or profitable ecosystems, leaving others unprotected and exacerbating existing inequalities. Secondly, insurance coverage may create a moral hazard, leading individuals and organizations to feel less responsible for protecting the environment. Additionally, a lack of transparency around insurance policies can cause confusion and misunderstanding about what is covered. The use of insurance to incentivize nature-based solutions may also have unintended consequences on local communities and ecosystems. Finally, holding insurance companies accountable for their role in biodiversity and nature protection may be challenging, especially if their policies contribute to negative environmental impacts. These drawbacks highlight the importance of carefully considering the role of insurance companies in promoting biodiversity and nature protection.

2. Relevant international and EU standards and conventions

NATURANCE is obliged to adhere to the ethical principles and guidelines outlined in the Horizon Europe Research and Innovation program, as well as the principles and rules established within it. This also encompasses compliance with relevant national, international, and European Union laws, such as the Charter and the European Convention for the Protection of Human Rights and Fundamental Freedoms and the European Code of Conduct for Research Integrity. The latter provides a structure for self-regulation for the entire European research community, covering all research settings and disciplines.

1 Article 19 of the following regulation specifies the ethical obligations: Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination (link)

The principles of research integrity enlisted in the Code include reliability, honesty, respect, and accountability. This involves ensuring quality in all aspects of the research, being transparent and fair in reporting, treating colleagues and research participants with respect, and taking responsibility for the entire research process, including its wider impacts. The code also enlists good research practices in the research environment; training, supervision, and mentoring; research procedures; safeguards; data practices and management; collaborative working; publication and dissemination and reviewing, evaluating and editing.

The 2017 updated version of the Code considers emerging issues related to technological advancements, open science, citizen science, and social media, among other fields. The European Commission acknowledged the Code as the key document for research integrity for all research projects funded by the EU, and as a role model for institutions and researchers throughout Europe. The NATURANCE consortium partners have acknowledged and committed to adhering to all ethical considerations outlined in the Horizon Europe regulation by signing the grant agreement. Hence, a list of standards and conventions is not included in this report.

The Horizon Europe regulation also refers to responsible research and innovation (RRI) as a way to conduct scientific research and technology development with consideration for its impact on society and the environment. RRI involves prioritizing the resolution of societal problems and ethical research practices, as well as promoting gender equality, science education, involving communities in the research process. MoRRI indicators are a set of indicators developed by the European Commission’s ‘Monitoring the Evolution and Benefits of Responsible Research and Innovation’ (MoRRI) project. These indicators are used to assess the extent to which research and innovation practices are responsible. The MoRRI indicators cover various aspects such as ethics, gender equality, public engagement, science education, open access, and governance. They are intended to help research organizations to monitor and evaluate the impact of research and innovation activities on society and the environment.

3. Activities in Naturance that could raise ethical concerns

NATURANCE is designed around the principles of equal and equitable participation and opportunities, inclusive methods and processes, and particular attention paid to those communities and regions that are most vulnerable and have low capability to design comprehensive financial forms. These principles form the core of NATURANCE’s ethical approach to research and other activities. In this section we describe specific NATURANCE activities that could raise ethical concerns, first with regard to substantive research activities and, second, with regard to the research process.

3.1 Ethical concerns relevant to NATURANCE substantive research activities

The predominant ethical issues related to the substantive scientific research topics are in relation to i) insurance and financial instruments (WPs 2 & 3); ii) the implementation of NbS (WPs 2 & 3); and iii) the underlying methodologies for assessing risks (WP4).
i) Ethical questions arising from insurance and financial instruments (WP2, WP3)

Insurance, as society’s foremost risk-sharing institution, is fraught with ethical concerns as are other financial instruments that enable NbS. The fundamental ethical question for insurance concerns its pricing, or who pays the premium? Risk-based insurance premiums (mutuality principle) can shift responsibility to vulnerable households and communities; alternatively, solidarity arrangements, for instance through subsidies, can make insurance more affordable and accessible to the most vulnerable, but at the same time discourage risk reduction. A related ethical question is who is responsible for assuring public and individual household/business safety, those experiencing the risk or the government? This question is fundamental to risk governance and the constellation of public-private insurance systems. Moreover, insurance products, themselves, are not value neutral. Parametric products, as one topical case in point, are forbidden in some US states and countries due to their kin to a gamble or lottery, which raises difficult ethical issues.

Insurance companies may only offer coverage to certain types of biodiversity or ecosystems that are considered more valuable or profitable, leaving others unprotected. This can exacerbate existing inequalities and perpetuate environmental injustices. Insurance coverage for nature and biodiversity protection may create a moral hazard where individuals or organizations feel less responsible for taking preventative measures to protect the environment, assuming that insurance will cover any losses or damages. There may also be a lack of transparency around the terms and conditions of insurance policies related to biodiversity and nature protection, which can lead to confusion or misunderstanding about what is covered and what is not. There may be challenges in holding insurance companies accountable for their role in biodiversity and nature protection, particularly if they are not transparent about their policies or if their policies contribute to negative environmental impacts.

ii) Ethical questions arising from nature-based solutions (WP2, WP3)

Nature-based solutions are also not ethically neutral with regards to how their costs and benefits are distributed. Some particularly thorny ethical questions concern, for example, who pays for NbS, and who benefits? Switching NbS financing from the public to private sector can have strongly differentiated impacts across social groups. Moreover, highly contentious ethical issues arise from *eminent domain*, or confiscating private property for greater public good, and determining fair compensation. Moreover, while all of society can benefit from nature, NbS can negatively impact poor communities, for example, if housing prices increase due to greening of a neighbourhood, leading to gentrification.

Gentrification is a process that occurs when wealthier individuals or groups move into a low-income neighbourhood, often resulting in the displacement of the original residents. Nature restoration and NbS projects can drive gentrification. For example, urban green regeneration may increase property values and attract investment to the area, making it more desirable to affluent individuals and groups. This is due to the fact that regeneration projects may involve the creation of facilities like parks, hiking trails, or waterfront access, which can enhance the appeal of the area and contribute to improving the overall quality of life. Gentrification can lead to the loss of
affordable housing and push low-income residents to less desirable areas. Increased property values can lead to higher property taxes, which can further displace long-term residents who can no longer afford to live in the area. To mitigate the negative impacts of gentrification driven by nature-based solutions, it is essential to engage with local communities from the outset and involve them in the planning and decision-making process. This can involve providing affordable housing options, protecting cultural heritage and subsistence practices, and ensuring that restoration projects do not negatively impact the existing community.

iii) Ethical questions arising from risk and co-benefit assessment models (WP4)

Catastrophe models and other methodologies are essential for assessing risk and thus for designing insurance instruments, also taking account of the risk-reducing potential of NbS. Yet, the design and application of risk assessment methods are not free of ethical considerations, particularly regarding if and how the model delineates the distribution of the risks across vulnerable groups and communities. Risk to whom, including future generations, is an essential question to address as part of the assessment. Moreover, the model assumptions can bias the assessments even skewing the distribution of risk.

Climate risk and performance assessment models require an analysis of the potential effects of climate change on different sectors and an evaluation of the extent to which NbS can effectively mitigate those impacts. It is essential for these models to provide insights into whether climate change risks have a disproportionate impact on vulnerable and marginalized communities and whether the proposed solutions are equitable and do not worsen existing inequalities. The model-based assessments should be transparent and inclusive, with input from a diverse range of stakeholders, including impacted communities. It is crucial to ensure that the assessments are based on accurate and unbiased data and that the strategies developed are accountable and effective.

3.2 Ethical principles guiding NATURANCE substantive research

An overarching principle that can guide research that addresses the above and other ethical questions arising from NATURANCE substantive research is ‘responsibility’. In the context of research ethics, responsibility means that researchers respect and protect the welfare of people and the environment, and avoid causing harm. Applying this principle to relevant ethical questions as part of NATURANCE would, in the broadest sense, require researchers to take account of the issues and respect the different views of researchers and stakeholders throughout the research process. More specifically, responsible research should be based on the following basic principles (adapted from the SATORI social responsibility principle³, DG Research and Innovation’s guidance,

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Ethics and Data Protection”⁴, and the Austrian BMBWF “Best Practice Guide for Research Integrity and Ethics” ⁵):

- **Scrupulousness:** Anticipate and consider the potential consequences of the project for society, environment and common good; and take appropriate action to address potential negative impacts
- **Respect:** Comprehensively, and without bias, include the plural views on the topic issues; pursue dialogue with local knowledge bearers and involve them in the research; exercise duty of care for the subjects of research
- **Transparency:** Clearly state all assumptions of the analysis, as well as the data and methods; assure clarity in the line of reasoning; as much as possible, allow access to the research data; estimate and explain uncertainty
- **Impartiality:** ensure accuracy and impartiality of research implementation (choice of method, assessment of data, weights attributed to alternative statements) and dissemination of results; assure research independence of political, economic and ideological factors
- **Integrity:** make the necessary references to work of other researchers; refrain from presenting research results more favourably or unfavourably than they are; refrain from any form of plagiarism (including self-plagiarism); avoid misrepresentation of credentials and conflicts of interest

Research shows that men and women have different views and responses to risks, with women generally more concerned about health and safety issues and environmental risks due to their social role as nurturers and care providers. Gender also plays a significant role in how individuals experience and are impacted by climate change, with women often facing greater vulnerability and exposure to extreme events, including higher rates of domestic and sexual violence. Gender-neutral approaches to adaptation and resilience are often insufficient and unjust, and a more intersectional approach is needed that considers the complex interplay of social identities and differences, such as age, ethnicity, class, sexuality, (dis)ability, colonial status, and migration status. In the NATURANCE project, gender is recognized as an integral component of research and innovation, with gender-disaggregated insights being produced, and resilience metrics and solutions spaces considering gender as a determinant of resilience. Communication and dissemination strategies will also be designed to be gender-inclusive.

3.3 Ethical concerns relevant to NATURANCE research process

NATURANCE employs a series of activities to support the project goals, including outreach activities, collaborative dialogue activities and utilizing human research subjects for research purposes. Each can raise concerns about protecting the rights and privacy of participants. The activities include:

- Festivals and webstivals
- Webinars and/or podcasts

• Workshops and co-organised sessions to major conferences
• On-line citizen forums
• Capability-building forums
• Innovation labs
• Expert working groups
• Stakeholders contact lists
• Interviews
• Analytical surveys and calls for evidence

3.4 Measures to ensure an ethical research process

This section describes measures the project will implement to ensure that the project is carried out in compliance with EU regulations on privacy and data protection, and in line with ethical standards in research and society. This section is focused on research ethics, whereas specific measures to ensure personal data protection are contained in the NATURANCE Data Management Plan (D6.1).

3.4.1 Identifying and recruiting participants in all activities

To ensure inclusive and representative participants and samples that include a broad range of views, researchers will seek to achieve diversity across gender (aiming at 50% female), age, geographical distribution, experience level, regional socio-economic situation and, if possible, values and worldviews. The responsible NATURANCE partners will ensure there is no judgment, discrimination, or bias.

For those activities involving stakeholders, partners are encouraged to publicise research activities on social media and encourage relevant stakeholders to get in touch. To ensure that different groups (including vulnerable groups) are invited to participate in the research, NGOs and CSOs that work directly with diverse populations should be contacted.

Once identified as a potential participant, only those who give prior, voluntary, unambiguous, and informed consent will be engaged in NATURANCE human-research activities. No incentive mechanisms will be provided, other than the potential for first access to project results. Participants will be assessed to ensure no conflicts of interest. Overall, recruitment and informed consent procedures will be conducted to ensure no coercion is exerted and participation is voluntary. Throughout, the ethical implications of participation will be considered, such as dignity, non-discrimination, non-malevolence, and well-being. Redress mechanisms will be designed to address complaints or concerns raised by individuals or groups who have been (or feel) negatively impacted by NATURANCE activities. It will allow individuals to voice their complaints and get remedies.

Prior to the implementation of interviews, surveys, and the innovation labs, all individuals will be informed according to the informed consent procedures as detailed in Section 4.2 below. Consent will also be required for all recorded activities, as well as for individual responses that are subsequently used in published materials.
3.4.2 Informed consent procedures

Respect for persons means that individuals have the right to be treated with dignity, and their autonomy must be upheld. We will seek to obtain informed consent from participants, ensuring that they understand the purpose, risks, and benefits of our research. We will protect the privacy and confidentiality of participants, ensuring that personal information is not disclosed without their consent.

We will follow established ethical procedures surrounding research with human participants and in those cases deemed necessary, collaborative dialogue activities, including obtaining voluntary informed consent, as well as ensuring participants’ privacy, anonymity, confidentiality, and the protection of their personal data (see NATURANCE Data Management Plan). See Annex I for the participant information sheet and consent form templates. The following procedures will be taken into account:

- Partners will provide participants with understandable information on the activity and voluntary consent forms, preferably in their native language and with terms fully understandable to them, using either paper copies or online copies on EUSurvey by providing information on the data processing.
- The forms will detail the aims and methods of the research and any benefits or risks (e.g., to privacy) that might be involved. They will explicitly affirm that participants have the right to refuse to participate and to withdraw their participation, or data, at any time, without any consequences. The forms will outline how partners will collect and protect data during the project, store it securely, and then delete it.
- Before the start of a workshop, interview, or other activity that could raise ethical concerns, the partners will ask participants from outside the consortium to review an information sheet and to sign an informed consent form.
- Participants will be asked to sign a consent if they will be photographed or recorded visually (e.g., video) during project activities.
- Paper consents will be stored in secure file storage at the premises of the partner organising the event. A scanned copy will be stored on a NATURANCE partner’s secure storage device in access-restricted folders. The paper copies will be destroyed at the end of the project. Online consents will be stored on EUSurvey and subsequently transferred to an access-restricted folder on a NATURANCE partner’s secure storage device. The access will be granted only to partners of the consortium and will be password protected.
- Upon completion of the project, electronic copies will be kept of the consents by the project coordinator for up to 5 years, to meet EC requirements.

3.4.3 Balanced gender representation

Achieving gender balance in research is important to ensure that diverse perspectives are represented, and that biases are minimized. NATURACE is committed to address biases and promote inclusivity at every stage of the research process, from recruitment to leadership. By taking these steps, we will work towards ensuring that our work is more representative, more impactful, and more reflective of the diverse perspectives and experiences of people from all genders. We will implement following practices to ensure gender balance:
- Gender neutral recruitment: Recruitment processes will not be biased towards any particular gender. Job descriptions and selection criteria should be written in a way that does not favour any gender, and outreach should be conducted in a way that is inclusive of all genders.

- Gender balance in research teams: Research teams will be diverse and inclusive, with gender balance being a priority. This can be achieved by actively seeking out candidates of different genders, and by using blind recruitment processes where possible.

- Gender-inclusive research questions and methodologies: Research questions and methodologies in WP2-4 will take into account gender perspectives and experiences, where possible. This can involve consulting with gender experts or including gender perspectives in the design and analysis of research.

- Gender balance in leadership positions: Gender balance is also a priority in leadership positions within work packages. Currently, three out of five WPs are led by female experts. We will implement practices that promote gender equality in leadership, and actively seeking out and promoting qualified candidates of different genders.

3.4.4 Bias-free language and respectful communication

We recognise the importance of using respectful and bias-free language in all communications related to human-subject research. This includes using inclusive language, avoiding stigmatizing or offensive language, and respecting individuals’ gender identity, ethnicity, and culture. The use of respectful and bias-free language acknowledges the diversity and complexity of human beings and their experiences and ensures that research is conducted in a manner that is sensitive and respectful to all participants.

4. Ensuring ethics compliance

4.1 Importance of ethical considerations in the activities of the NATURANCE project

The NATURANCE project is designed to promote the use of nature-based insurance and investment solutions to enhance environmental sustainability without causing any harm to any party. It does not include any activities that raise significant ethical concerns. It is purely focused on coordination and supporting activities, and it does not include any activities that may cause physical, emotional, or psychological harm to individuals, communities, or the environment. However, as introduced earlier, we have designed our activities with a clear focus on conducting research in a manner that is respectful, transparent, and accountable and hence comply with the ethical principles and guidelines. All aspects of the project, including research design, data collection, analysis, and dissemination, have been carefully planned and implemented with ethical considerations in mind.

- We have ensured that all participants will give informed consent and that their confidentiality and privacy will be protected throughout the project.
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- We have provided participants with the option to withdraw from the project at any time, and we have provided appropriate support and referrals for any participants who may have experienced discomfort during the research process.
- We have taken steps to ensure that our research methods are culturally appropriate and sensitive to the needs and perspectives of participants.
- We will consult with community members and stakeholders to ensure that our research questions and methods align with community needs and values.
- We are committed to upholding the highest standards of ethics in all its research activities.

4.2 Management or oversight of ethical vigilance

The project consortium recognizes the importance of ethical considerations in research and acknowledges that any unethical conduct can have consequences on individuals, communities, and the environment. Therefore, we remain vigilant and take all necessary measures to ensure that the research activities are conducted in an ethical and responsible manner.

Within the framework of WP6 Coordination and Management, we have allocated task T6.2 to address management areas that require special attention and strategic significance. These areas encompass Ethics and Responsible Research and Innovation, Data Management and Intellectual Property Rights, as well as Collaboration with and across other Higher Education projects, Missions, and Partnerships. Regular monitoring and reporting on these three areas will be carried out during the project steering committee meetings.

We have planned this deliverable as a preliminary assessment of any possible issues that may arise during the project. Other factors that may become apparent later in the project implementation will be incorporated into deliverable D6.4 (Intermediate report on critical risk analysis, month 18).

This report identifies the following roles and duties of NATURANCE consortium partners during the implementation of the project activities:

- When engaging with knowledge networks and individual experts through activities like interviews or participating in project-organized events such as innovation labs or expert workshops, all participants will be selected fairly without any bias or discrimination. The benefits of the study will be shared equitably, and participation will be based on informed consent. Participants have the right to withdraw from the study at any time. At the end of these activities and events, feedback will be gathered, and a summary of the results will be incorporated into the reports on the societal impact of the project.
- When conducting analytical reviews (in WP3 and WP4) or assessing knowledge for the purpose of developing innovative solutions (in WP2), we will take into consideration the ethical considerations outlined in section 3.1. Specifically, we will assess whether the analysed literature takes into account ethical considerations and whether the proposed nature-based investment and insurance solutions may raise concerns related to social justice. Teams working on the above activities will identify the ethical considerations in the mapping review protocols and terms of reference of the innovation labs.
- The synthesis deliverables, including D5.4 (Compendium of NBIS and key recommendations for science and policy) and D5.5 (Design principles & metrics for nature-based insurance and
investment solutions), will include dedicated sections that address potential ethical concerns and provide suggestions for how to handle them.

- All dissemination activities designed and planned in WP5 will strictly follow the measures outlined in section 3.4.
- A relevant subset of MORRI indicators\(^6\) (see section 2) will be used for reporting on societal impacts of the project (deliverables D6.3 and D6.5).

Annex 1: Information and consent form

Privacy Policy for NATURANCE Project
Insurance for Nature - Nature for Insurance

All partners in the NATURANCE project are committed to protecting and respecting your privacy. This Privacy Policy sets out the basis on which your personal data will be processed by us in connection with our communication and dissemination processes. Please read the following document carefully, to understand our views and practices regarding your personal data and how we will handle it. When you fill out the User & Policy Needs Survey, these Privacy Policy provisions will apply to our processing of your personal data. The data controller is the Data Management Officer of each respective partner.

What is NATURANCE?
The NATURANCE project is funded by the Coordination and Support Actions of the Horizon Europe Framework Programme. It is aims to investigate the feasibility and effectiveness of solutions that combine disaster risk financing and investments with nature-based solutions, both technically and financially. The project seeks to facilitate conversations, share knowledge, and encourage mutual learning among various policy and practice areas. The project’s objective is to provide a comprehensive and collaborative evaluation of nature-based insurance and investment solutions from both societal and business perspectives and to promote the adoption of jointly developed principles, performance metrics, and recommended approaches for analysis and design. These recommendations align with the EU’s sustainable finance framework. The ultimate goal is to encourage the adoption of these principles and approaches to promote sustainable and nature-based solutions for disaster risk financing and investment.

Your participation
You will be asked to participate in [insert what the participant is being asked to do. Suggestions below.]

**Interviews** where we will ask you questions about your professional opinions and experiences in NbS and/or insurance/financing. The interview will take 30-90 minutes, in person or virtually.

**Expert working Groups** where diverse experts will be brought together to consider the practicalities and challenges of your work and how it relates to NbS and/or insurance/financing.

**Surveys** where you will be asked for general opinions and experience in NbS and/or insurance/financing.
**Innovation labs** where diverse experts and stakeholders will be brought together to assess existing and explore new areas for insurance & investment solutions and revenue models supporting NbS. 

**Other** add

By taking part in these activities, you will be asked to provide the following information:

1. Your name, professional affiliation, and contact information.
2. Your personal and professional views and experiences as they relate to the activities above.
3. Photographs, audio, and/or video recordings of your participation.

**Categories of data that will be stored**

Identifiable data such as email-addresses and names will only be stored during the registration process. If you consent to the processing of your user-generated data for the above-mentioned purpose, the categories of personal data that will be collected and stored through the RECREATE simulation are:

- Name (registration only)
- Email address (registration only)
- Responses to interviews, surveys
- Recorded discussions of physical and virtual meetings

Email addresses and names will never be shared publicly, however the report/publication will make use of your anonymized, user-generated data. Data can be amended at any time.

**Data sharing**

Data will only be shared internally with the NATURANCE project team, who will process the personal data of subjects according to the present statement and for the purposes declared herein.

**Security of Processing and Data Retention**

The security and protection of your personal data is very important to NATURANCE partners. The partners have undertaken all appropriate organisational and technical measures to ensure that the data that are collected in the framework of the present declaration is processed according to the NATURANCE Data Management Plan. We take appropriate measures to ensure that all personal data is kept secure including security measures to prevent personal data from being accidentally lost or used or accessed in an unauthorized way. Those processing your information will do so only in an authorized manner and are subject to a duty of confidentiality. We will not store personal data, but we will store anonymized user-generated data until you withdraw your consent, however no longer than necessary for the purposes of this processing activity and if we
have no other legal basis for keeping them (e.g. legal obligations: for Auditing purposes the storage time is 7 years, thereafter they will be deleted).

**Legal Basis on which we process your data**

We process your data based on your informed consent (Art.6(1)(a) GDPR). You can withdraw your consent at any time without giving any reason by contacting ____________

The withdrawal of consent has no consequences whatsoever for you. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

**Exercise of your rights**

It is noted that according to the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016), you may exercise the following rights that derive from the Regulation:

- Right of access and right to rectification for inaccurate personal data
- Right to erasure of personal data if they are not necessary for service provision
- Right to restrict processing of your data
- Right to object to the processing of your data
- Right to data portability, namely right to receive your data in a structured, commonly used and machine-readable form so that they can be transferred to another data processor.
- Additionally, you have the right to submit a written complaint to the responsible supervisory body for personal data protection in each country.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred.

**Contacting us**

The data controller (insert name of your institute) is responsible for enforcing this data agreement. You may withdraw your consent any time (without retroactive effect) by sending an email to ____________. We strive to attend to your request within 48h.

**Consent**

I have read the above data policy and agree with its terms and conditions:
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