



RAMSES

Internet forensic platform for tracking the money flow of financially-motivated malware

H2020-700326

D1.5 RAMSES Ethical protocol

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1 INTRODUCTION

This confidential document outlines the ethics protocol for the RAMSES project. This protocol contains ethical principles and protocols that all partners have agreed to follow when interacting with research participants and collecting, storing, using, analysing and publishing data¹ and results. It is the reference point within the project for matters relating to research governance, and will be used and referred to accordingly by researchers. The main aspects of the RAMSES project relating to ethics are the protection of research participants and researchers. As to the former, we value the protection of identity, privacy, obtaining informed consent and data protection. It is also a key part to the RAMSES approach that the collection of personally identifiable data is restricted to that required for project to meet its objectives, and is therefore based on a premise of minimisation.

This protocol introduces key research ethics principles and the obligations of RAMSES partners in Section 2. Section 3 describes the RAMSES project and lists the research objectives and methods used for data collection. Section 4 is the RAMSES protocol which describes in what way research should be carried out and how to ensure the privacy and safety of research participants through ethical research conduct and data management. Annex A includes the RAMSES information sheet that should be given to all participants to ensure informed consent. Annex B includes the informed consent form itself. Annex C holds a template for letters of compliance from all consortium partners. All partners will send the Trilateral a copy of their signed letter of compliance, which will be added to the ethical protocol.

2 RESEARCH ETHICS AND PARTNER OBLIGATIONS

Scientific integrity and proper conduct during research activities is an essential aspect of responsible research practice. This ethics protocol is based on key research ethics protocols² from organisations such as the European Commission (EC)³, Economic and Social Research Council in the UK (ESRC)⁴, British Sociological Association (BSA)⁵, Social Research Association (SRA)⁶, and Association of Internet Researchers (AoIR)⁷. For conducting responsible and ethical social research with human participants the following principles apply:

1. Research participation should be voluntary and free from coercion.
2. Research should provide value that outweighs any risk or harm. Researchers are responsible for maximising benefit and minimising harm.

¹ The RAMSES Data Management Plan also holds detailed data management procedures for the project

² The documents referred to in this protocol will be made accessible for all RAMSES partners

³ European Commission, Ethics, <https://ec.europa.eu/programmes/horizon2020/en/h2020-section/ethics>

⁴ Economic and Social Research Council, <http://www.esrc.ac.uk/about-esrc/information/framework-for-researchethics/>

⁵ British Sociological Association, Statement of Ethical Practice for the British Sociological Association (March 2002), <https://www.britisoc.co.uk/equality-diversity/statement-of-ethical-practice/>

⁶ Social Research Association, <http://the-sra.org.uk/home/about/>

⁷ Association of Internet Researchers, Ethical Decision Making and Internet Research v2.0, 2012. <https://aoir.org/reports/ethics2.pdf>

3. Research participants, as well as research staff, should be provided with accurate information about the research, objectives, methods, purpose and use of data.
4. Confidentiality regarding research participation should be ensured. Participations by individuals as well as groups should be anonymised and their wishes in this regard respected.
5. Personal data should be protected according to data management procedures (refer to RAMSES Data Management plan) and data protection regulation (General Data Protection Regulation EU 2016/679).
6. Research should be independent and any conflicts of interest or partiality should be made clear.

The context of research, nature of participation, research design, research topic will affect how the above principles are enacted in the course of a research project. It is however clear that they should guide all those who conduct research with human participants.

The RAMSES project is complex, both in terms of its objectives as well as overall research design. Partners will conduct research which includes online and offline activities. This protocol will outline the potential ethical issues that may arise during the course of the project and how the consortium partners will mitigate any ethical issues that may arise. This protocol also includes the documents that RAMSES partners will use to ensure that informed consent is collected from participants.

All partners will ensure that individuals working on RAMSES research read this document and comply with it in their research conduct for the project. All staff members should have the opportunity to raise questions with key staff members involved in the project in order to gain further information on appropriate ethical behaviour, should it be required. RAMSES partners will also ensure that ethics guidelines, specific to social and internet research, are available in their shared repository for staff members to access and review. Ethical issues will form a standing item on the agenda of regular project meetings.

An Ethical, Social and Legal Committee has been formed for the RAMSES project, which will provide guidance on the project's activities and their adherence to the relevant European regulation. The Committee will be chaired by the Ethical Manager, Anna Donovan from Trilateral Research.

The Committee comprises representatives of the end-user partners, the Ethical Manager and experts from partner institutions who are experts on tracking ethics, data protection and relevant technical infrastructures. In particular, the Committee has the following functions:

- To examine the yearly Work Plan for ethical or legal questions;
- To monitor and review project deliverables where ethical questions arise;
- To monitor upcoming ethical implications;
- To propose solutions to legal and ethical questions coming from the participants;
- To ensure the approval of ethical procedures by the competent legal local/national Ethics

- Boards/Bodies/administrations in the countries where the different end users validation will take place (i.e. Portugal, Spain, Belgium).

Furthermore, an external ethical expert advisor, Professor Vincent C. Müller from University of Anatolia College, Greece and Academic Fellow at the University of Leeds, United Kingdom has been appointed for the project, who will review this protocol and provide ethical guidance to the consortium for the duration of the RAMSES project.

2.1 DATA MANAGEMENT IN RAMSES

The RAMSES project has follows strict data management principles, which are outlined in detail the project Data Management Plan. In summary, the project has agreed the following principles:

- Data provided by project partners will be shared with consortium members, although consortium members will strictly adhere to any limitations placed upon the use and sharing of that data
- Human participants in RAMSES research, testing and validation activities are under no obligation to participate and their involvement will be strictly voluntary
- RAMSES partners will respect data protection and ethical research principles related to the following:
 - Participant confidentiality and anonymisation
 - Informed consent
 - Data minimisation
 - Purpose limitation
 - Transparency
 - Rights of access, correction and erasure
- The coordinator, TREE, will hold all data, including personal data and will manage access to this data for RAMSES partners.

RAMSES' Data Management Plan will align with aspects of relevant European-wide regulations, such as the general Data Protection Regulation, and will consider any relevant national regulations and standards applying to the individual partners in the consortium.

3 THE RAMSES PROJECT

The overall objective of RAMSES is to design and develop a holistic, intelligent, scalable and modular platform for Law Enforcement Agencies (LEAs) to facilitate digital forensic investigations. The system will extract, analyse, link and interpret information, related to financially-motivated malware, extracted from the Internet (and Dark Net and Deep Web). To achieve these objectives, this project will rely on Big Data technologies to firstly extract and store, and secondly look for patterns of fraudulent behaviour in enormous amounts of unstructured and structured data. The project will focus on two case studies: ransomware and banking Trojans. To this end, RAMSES brings together the latest technologies to develop an intelligent software platform, combining scraping of the public and deep web, detecting manipulation and steganalysis⁸ for images and videos, tracking malware payments, extraction and analysis of malware samples and Big Data analysis and visualizations tools.

⁸ Studies the detection of hidden messages using steganography

The objectives of RAMSES are as follows:

1. To undertake a programme of focused research and analysis providing the information, awareness and understanding of existing, current and emerging best practice for combating organised crime across EU. Defining operational and ethical implications for LEAs all over Europe. Modelling malware from the point of view of Economic Theory.
2. To conduct research and development into technological, end-user driven set of tools that support LEAs Investigations, through a platform with different modules:
 - Module to extract information in identified forums used by cybercriminals for criminal intelligence on new and future threats as well as obtaining evidence of current cybercrime,
 - Module for tracking malware payments,
 - Innovative forensic module for discovering hidden information in communications and malware samples,
 - Big Data Platform for storage and search for patterns of fraudulent behaviour.
3. To demonstrate the impact of the RAMSES platform, through several pilot exercises in different countries, training and awareness campaigns.

3.1 RAMSES RESEARCH METHODS AND POTENTIAL PARTICIPANTS

The RAMSES project will involve research in the form of interviews, survey, focus groups, workshops and pilots, all of which include fully rational adult participants. All of the above research will be conducted with people in their professional capacity as experts (e.g., law enforcements, representatives and other experts on e-crime, policy makers, technology developers and end-users).

In addition to these ‘traditional’ social research methods, RAMSES will also rely on new ways of gathering data in online environments (Internet, Dark Net and Deep Web), as summarised in the below table.

Research method	Potential participants
Mass media analysis of information posted on social media, blogs and forums, for the purpose of developing and testing the software tool.	The public – users of mainstream social media, e.g. Instagram, Flickr, Facebook, Twitter, Reddit, etc.). People of all ages and nationalities. (see detail in 2.4)
Collecting visual image data such as videos uploaded to social media, for the purpose of testing the software tool.	The public – users of mainstream social media. People of all ages and nationalities. (see detail in 2.4)
Collecting data from network protocols such as TCP/IP, VoIP, Instant messaging and online games, for the purpose of testing the software tool.	Online users acting within various online settings, most of them associated with leisure and social exchanges. People of all ages and nationalities. (see detail in 2.4)

3.2 COUNTRIES WHERE RESEARCH WILL TAKE PLACE

Partners will each seek external review of this protocol by an appropriate body in their home countries: Spain, United Kingdom, Italy, Germany, Portugal and Belgium.

Partner	Short Name	Country
Treelogic	TREE	Spain
Ministerio de Justicia	MJ	Portugal
University of Kent	UNIKENT	United Kingdom
Centro Ricerche E Studi Susicurezza E Criminalita Associazione	RISSC	Italy
Universidad Complutense de Madrid	UCM	Spain
Fachhochschule für öffentliche Verwaltung und Rechtspflege in Bayern	BayFHVR	Germany
Trilateral Research Ltd	TRI	United Kingdom
Politecnico Di Milano	POLIMI	Italy
Service Public Federal Interieue	BFP	Belgium
Universität des Saarlandes	USAAR	Germany
Ministerio del Interior	MI	Spain

3.3 WHO WILL BENEFIT FROM THE RAMSES RESEARCH

It is the intention of the RAMSES consortium to disseminate the news and results of the project to a specific audience; i.e. those involved in combatting malware, as well as those involved in further research activities. The various stakeholders including: EU authorities, policy-makers, LEAs, civil society organisations, academics, technology developers and where required, news professionals (to raise awareness) will directly benefit from the research. In addition, in the long-term RAMSES partners hope to be able to contribute to Internet security efforts across Europe.

The main beneficiaries of RAMSES will be LEAs, who will obtain the tools and methods for preventing and tackling malware use. Technological progress will also benefit from RAMSES, as new platforms and approaches to identifying and shutting down malware will be established and disseminated across the EU. Finally, researchers and academic knowledge will benefit from RAMSES as well through enhanced understanding of malware developers', users' and victims' practices.

3.4 ETHICS MONITORING DURING THE COURSE OF THE RESEARCH

Throughout the project the ethical stance and conduct of the RAMSES consortium will be monitored and evaluated by the external ethics reviewer Professor Vincent C. Müller and the RAMSES Ethical, Social and Legal Committee, as outlined above.

4 THE RAMSES ETHICS PROTOCOL

RAMSES is a complex project, which uses a mix of “traditional” social science research methods (interviews, focus groups, workshops, questionnaires and a survey) as well as new technologies to scrape data from the Internet. While ethics principles and conduct for social research are well established, the establishment of good ethical practice is somewhat underdeveloped when it comes to dealing with data in online environments. The foundational principle of research ethics does however apply, that research should not cause harm to participants. This section will outline the ethical protocol that all RAMSES partners should adhere in their research conduct within the project, including recruitment of participants, data collection and data storage⁹.

4.1 RECRUITMENT AND INFORMED CONSENT

Recruitment in RAMSES will occur through the networks of the RAMSES partners. All participants are fully rational adults who are participating in their professional capacity. All partners conducting any data collection or research on RAMSES (this includes interviews, focus groups, questionnaires, survey, pilot and training exercises) will follow the below steps to ensure that all research is ethically robust.

- All participants will be **informed** of the project’s research goals and the participating partners in the form of a research information sheet, as well as the researcher’s contact details should they wish to contact them at a later date. The form also includes details of the purpose of data collection, how data is stored, for how long etc. (See Appendix A)
- Participants will be reminded that their participation is **fully voluntary** and that they can decline to answer any questions and/or terminate their participation at any time. Where possible, all participants will be asked for their written **consent and confirmation** that they understand how their data will be used. Participants’ identity (including their affiliation) will be kept anonymous, providing them with full confidentiality. Participants will have the ability to request that their **data be withdrawn** at any time during the course of the project. If they so request, the procedures related to the “right to be forgotten” will be followed. (See Appendix A and B)
- The consortium will also ensure participants’ **privacy, anonymity, confidentiality and the protection of their personal data** as described in the project’s Data Management Plan.

As a foundational principle the consortium will follow ethical procedures surrounding research with human participants to ensure the research does not bring harm to any participants. Partners will make it clear to participants that they will keep their information as confidential as possible, but will remind them that researchers are legally and ethically obligated to divulge any relevant information to relevant authorities should they believe anybody is at risk of being harmed. Should this arise, the following steps will be taken:

⁹ As outlined in the RAMSES Data Management Plan

- 1) The researcher will report to the head of their organisation involved in the RAMSES project, the project coordinator and head of the Ethical, Social and Legal Committee to determine whether additional steps are required.
- 2) If required, the project coordinator will discuss any potential follow up with the RAMSES ethical expert who will then provide the consortium with further guidance on how to proceed.

4.2 ETHICAL CONSIDERATION FOR RAMSES INTERNET DATA COLLECTION

Research on the Internet and online communication poses specific ethical challenges, regarding informed consent and privacy as the data of thousands of individuals can be collected in any one session. Conducting data collection online also makes it difficult to ascertain who is a participant to the research, as age and potential vulnerability of data subjects can be impossible to gauge from their data online.

In RAMSES, researchers should take special care when carrying out research via the Internet and bear in mind that although the development of ethical standards for internet research are currently under development, there are always ethical considerations when doing research with human participants and their data. Because all digital information at some point involves individual persons, consideration of principles related to research on human subjects is necessary even if it is not immediately apparent how and where persons are involved in the research data.¹⁰

Consortium partners have a responsibility to ensure that the physical, social and psychological well-being of research participants is not adversely affected by the research. Also, the partners should strive to protect the rights of those they study, including their interests, sensitivities and privacy. The key consideration for RAMSES is that even though people may operate in public online spaces they maintain strong perceptions or expectations of privacy.

RAMSES partners also need to bear in mind that not all individuals are well versed in navigating privacy settings, for example on social media and may thus perceive their communication to take place in private. Furthermore, many individuals may acknowledge that the substance of their communication is public, but that the specific context in which it appears implies restrictions on how that information is used by other parties.¹¹ Users may not anticipate that their data is used for research purposes, such as the RAMSES project, and it is therefore the ethical duty of the RAMSES partners to keep data safe and anonymised to ensure that no harm befalls data subjects as a result of their data being used within the project parameters.

Partners must also attempt to conduct the identification of the categories of age groups and vulnerable persons and understand what constitutes harm and what will cause harm for each of these groups. When gathering data from social media, through web scraping, principles of privacy and harm minimisation should guide the data collection, analysis and storage.

¹⁰ See Association of Internet Researcher, Ethical Decision Making and Internet Research v2.0, 2012. <https://aoir.org/reports/ethics2.pdf>

¹¹ Ibid.

The table below outlines the actions that should be taken by RAMSES partners to protect the data of online participants to the research.

Data protection actions	
Anonymization	To ensure that it is not possible to identify individuals from the data collected by RAMSES. This applies to “real names” as well as user names.
Data minimisation	To ensure that only the data necessary to meet the RAMSES objectives is collected.
Not sharing the data with any parties other than consortium partners	Web-scraping may collect data that is sensitive or considered private and as such should not be shared outside of the consortium.
Other data protection procedures	As discussed in the RAMSES Data Management Plan.

With respect to data gathered from the Internet, Dark Net and Deep Web the following preliminary set of guidelines on potential compliance with ethical and privacy principles, will be followed:

- Partners will read through relevant terms and conditions of the platform(s) that they will be using to obtain data from.
- Partners will ensure they determine that the data they wish to access is public. If the social media user can reasonably expect to be observed by strangers then the information they pose can be deemed as public.¹²
- Partners will recognise the privacy concerns inherent with the collection and release of online data.
- No information will be collected on users’ personal data: e.g., demographic, relational, and cultural information – only data in relation to the RAMSES project will be collected.
- Where data is published, partners will anonymise users and ensure that they are not recognisable nor traceable. This also applies to online user names.

4.3 INTERVIEWS

Before each interview, participants should be explicitly informed about the purpose of the RAMSES project, its key objectives and about their rights and the protection of their data. It should be made clear that participation is voluntary and that they are free to withdraw at any time and have their data deleted. If they are to be recoded using audio (voice), the participants must be informed and consent must be sought. If they do not consent, the researcher may only record written notes from the interview. All participants will be given an informed consent sheet and the project information sheet. The procedure for storing the interview data is outlined in the RAMSES Data Management Plan. All interview data will be anonymised and any personal data collected, should be kept in a separate file from the interview notes/transcript. The RAMSES partners should aim to collect only data that is necessary to meet the research objectives.

¹² For more information see: Townsend, L., & Wallace, C. (2016), *Social Media Research: A Guide to Ethics*, The University of Aberdeen, <http://www.dotrural.ac.uk/socialmediaresearchethics.pdf>

4.4 PILOTS, WORKSHOPS AND TRAINING SESSIONS

All respondents will be given an informed consent sheet and information sheet. The researchers will clearly inform the respondents that the participation is voluntary and that all responses will be anonymised, confidential (not to be shared with parties external to the RAMSES consortium or for purposes other than RAMSES research) and stored securely. The interests of research participants will be protected and the work conducted as part of RAMSES will not interfere with their lives or personal rights.

4.5 ENSURING THE SAFETY OF RESEARCHERS

To ensure the safety of researchers, particularly researchers attending and conducting interviews alone, the consortium will adhere to the following procedures and practices.

However, if this is not possible, and researchers must conduct interviews on their own, the following procedures will be adhered to, as recommended by a number of UK Research Advisory Boards.¹³ Researchers will maintain contact with a nominated colleague. Specifically, they will furnish the nominated colleague with the following information:

- Name, address and telephone number (if possible) of interview destination.
- The researcher's mobile phone number
- Time leaving the office and time expected back
- Mode and route of transport to the interview
- Time and expected duration of the interview

If deemed necessary, the interviewer will arrange to inform their nominated colleague, in the presence of the interviewee, that they have arrived at the interview location. After the interview the researcher will contact their nominated colleague to inform them that they have left the interview safely. If the interview extends significantly beyond its original expected duration (to some pre-arranged deadline), the researcher will pause the interview to inform the nominated colleague of the extension.

If the pre-arranged deadline passes and the nominated colleague has not heard from the researcher, he/she should first attempt to contact the researcher via mobile phone. If there is no answer, he/she should try to contact the researcher again after 10 minutes. If there is still no response, the nominated colleague should try to contact the organisation or location at which the interview is being conducted. If the researcher still cannot be located, the nominated colleague should either proceed with another colleague to the interview location to check on the researcher, or notify emergency services, using their judgement to determine which is more appropriate.

Of course, mobile phones and their associated signals are not fool-proof. This is why researchers may arrange to inform their nominated colleague that they have arrived at the interview location, this way the researcher can determine whether they are in a location in which no mobile signal is available. If this is the case, researchers should enquire if there is a

¹³ See for example, Centre for Health and Social Care Improvement, "Guidance notes for Researchers conducting data collection off campus and working alone", University of Wolverhampton, no date. <http://www.wlv.ac.uk/pdf/lone%20working%20procedure%20for%20researchers.pdf>

landline they can utilise to contact colleagues and let them know that they cannot be contacted by mobile phone.

4.6 ETHICAL APPROVAL PROCEDURE

This document will be reviewed by the RAMSES external ethical advisor Vincent C. Müller and the RAMSES partners. A representative of each partner will sign a letter of compliance with the protocol, which will be stored by the project co-ordinator and a copy given to the EC. Each RAMSES partner will also seek external review of this protocol in their country to ensure that it complies with national ethical practices, rules and regulations. Each partner will produce a letter from the reviewing body that states that the protocol has been reviewed, and agreed. If any changes are requested, these will be reviewed by the RAMSES external ethical advisor and the project Ethical, Social and Legal Committee.

5 CONCLUSION

This document has identified the ethical issues pertaining to RAMSES research activities and outlined mitigating actions and the document review process. In summary, the RAMSES partners will avoid the collection of data that is not necessary for the purposes of meeting the project objectives (purpose limitation and data minimisation principles). The participants' responses will be fully anonymised. All partners will be provided with project information and will be asked to sign consent forms stating their understanding and consent to use of data.

In the case that informed consent cannot be sought, i.e., in instances of online data collection the same principles of purpose limitation data minimisation and anonymization shall apply.

Throughout the project, RAMSES partners will ensure that all research is conducted in an ethical manner described in this protocol. While this protocol is provided in the form of the project deliverable, it is a living document, and will be updated in line external and internal comment resulting from the review process and as the research progresses.

ANNEX A – RAMSES INFORMATION SHEET



RAMSES

Internet forensic platform for tracking the money flow of financially-motivated malware

I consent to participate in the European Union-funded¹⁴ RAMSES research project conducted by **NAME** of the **INSTITUTION**¹⁵. I am aware that the purpose of this research is to design and develop a holistic, intelligent, scalable and modular platform for Law Enforcement Agencies (LEAs) to facilitate digital Forensic Investigations. This findings of this **interview/workshop/pilot exercise/focus group/other** will assist the researchers to develop and test system and whether it meets end-user requirements. This research will help European LEAs better conduct online forensic investigations by providing them with a system that will extract, analyse, link and interpret information extracted from Internet related with financially-motivated malware.

This research will involve an interview/**focus group / workshop /consultation/pilot exercise** lasting **1-2 hours** where I will be asked questions within **my expertise on cybercrime/invited to give feedback** about the tool, discuss my understanding of what I see and provide feedback about how this might be integrated into the design and development of the RAMSES tool.

I understand that I am participating in this research voluntarily and that I am free to leave at any time, without any impacts on my employment. I am also aware that I am free to refuse to answer any questions that I feel are commercially or institutionally sensitive or relate to topics that I do not wish to discuss. I understand that I have the right to ask questions and receive understandable answers before making any decision.

I understand that I will only be asked to provide professional, not personal, information and the record of my involvement in the research will be kept confidential. I have been informed that everything I say will be anonymous. The event data will be recorded via **paper notes/tape recorder** and I understand that I can request a copy of the **notes/transcript** to review if I wish. I understand that I am also allowed to delete or make any changes to the **notes/transcript** if I feel the information I provided could be improved or clarified. I understand that information about my personal involvement in the research will be kept in a secure location at Treelogic and that my information will be made anonymous when shared with RAMSES researchers. I understand that the data I provide will be anonymised and the record of my participation will be kept in a file separate from the research data. I understand that the data will be kept for one year after the RAMSES project ends, but my personal data will be destroyed when the project ends.

I understand that this research conforms to European Commission guidelines and that it has been approved by the Ethics Committee in the Research Executive Agency managing Horizon 2020 projects. Finally, I have been given the contact details of the research team and I have been informed that I am free to contact Tatiana Silva (Project Coordinator) about any queries relating to my data or the project itself.

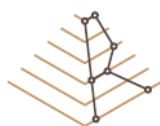
Tatiana Silva -
Treelogic
T: +34 910 05 90 88

¹⁴ Grant agreement number 700326

¹⁵ RAMSES partner conducting the research activity will amend all highlighted parts

tatiana.silva@treelogic.com - Project website: <http://ramses2020.eu/>

ANNEX B – RAMSES INFORMED CONSENT FORM



RAMSES

Internet forensic platform for tracking the money flow of financially-motivated malware

Lead researchers: **Insert name of person/institution conducting the research activity**

Participant Identification Number for this project: **Please initial box**

1. I confirm that I have read and understand the information sheet/letter (delete as applicable) dated **[insert date]** explaining the above research project and I have had the opportunity to ask questions about the project.
2. I understand that my participation is purely voluntary and that I am free to withdraw at any time without giving any reason and without there being any negative consequences. In addition, should I not wish to answer any particular question or questions, I am free to decline and can contact *Project Coordinator Tatiana Silva* via telephone or e-mail at +34 910 05 90 88 or tatiana.silva@treelogic.com
3. I understand that my responses will be kept strictly confidential.
4. I give permission for members of the research team to have access to my anonymised responses. I understand that my name will not be linked with the research materials, and I will not be identified or identifiable in the report or reports that result from the research.
5. I agree to take part in the above research project.

Name of Participant Date Signature
(or legal representative)

Name of person taking consent Date Signature
(if different from lead researcher) *To be signed and dated in presence of the participant*

Lead Researcher Date Signature
To be signed and dated in presence of the participant

Copies:
Once this has been signed by all parties the participant should receive a copy of the signed and dated participant consent form, the letter/pre-written script/information sheet and any other written information provided to the participants. A copy of the signed and dated consent form should be placed in the project's main

record (e.g. a site file), which must be kept in a secure location.

ANNEX C – RAMSES LETTERS OF COMPLIANCE FOR PARTNERS

To be delivered on relevant organisation letterhead/stationary

Date: [insert date]

[Insert organisation correspondence address]

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of [Insert Organisation name], have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of [Insert organisation name] that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,

[Signature]

[Full printed name and contact details]

ANNEX D – RAMSES LETTERS OF COMPLIANCE FROM PARTNERS

Attached are the letters of compliance received from partners to date. This Annex is a living document and will be updated again when all letters have been received from partners.



Date: 26/04/2017

Treelogic
Avenida Manoteras 38 – Oficina D614
28050 Madrid (Spain)

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of TREELOGIC, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of TREELOGIC that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,



Tatiana Silva

tatiana.silva@treeologic.com

phone: +34 910 05 90 88



Hochschule für den
öffentlichen Dienst
in Bayern

Fachbereich
Polizei

Hochschule für den öffentlichen Dienst in Bayern
Fachbereich Polizei, Postfach 1153, 82241 Fürstenfeldbruck

Sarina Ronert
Telefon +498141408232
Telefax (08141) 408-250
Email Sarina.Ronert@pol.hfoed.bayern.de

Date
26.04.2017

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of Hochschule für den öffentlichen Dienst in Bayern – Fachbereich Polizei, have read, understood, and am committed to adhering to the ethical principles outlined in the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of Hochschule für den öffentlichen Dienst in Bayern – Fachbereich Polizei that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,



Sarina Ronert

Hausanschrift:
Fürstenfelder Str. 29
82256 Fürstenfeldbruck

Öffentliche Verkehrsmittel: Telefon: 08141 408-0
S4 Geltendorf, Hst. Fürstenfeldbruck Telefax: 08141 408-250

E-Mail: poststelle.ffh@pol.hfoed.bayern.de
Internet: www.hfoed.bayern.de



Date: April 27, 2017

RiSSC – Centro Ricerche e Studi su
Sicurezza e Criminalità

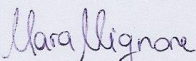
Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of RiSSC, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of RiSSC that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

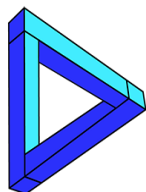
I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,



Mara Mignone
e-mail: mara.mignone@risc.it
mobile: +39 349 4509897



**TRILATERAL
RESEARCH**

Date: 27 April 2017

Trilateral Research Ltd
Crown House
72 Hammersmith Road
W14 8TH
LONDON**Subject: Letter of compliance for RAMSES Ethical Protocol**

This is to confirm that I, as a representative of Trilateral Research Ltd, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of Trilateral Research Ltd that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,


Anna Donovan
Senior research analyst
Trilateral Research ltd
anna.donovan@trilateralresearch.com



RAMSES Project Consortium

Date Thu, April 27th, 2017 Subject Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of the Chair of System Security at CISP A, Saarland University, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of the Chair of System Security at CISP A, Saarland University that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive and clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,

Prof. Dr. Christian Rossow

Chr. Rossow

GEFÖRDERT VOM



Bundesministerium
für Bildung
und Forschung

SAARLAND
UNIVERSITY 
COMPUTER SCIENCE



Max
Planck
Institute
for
Software Systems



Date: 28/04/2017

Spanish National Police
Julian Gonzalez Segador s/n
28043 Madrid (Spain)

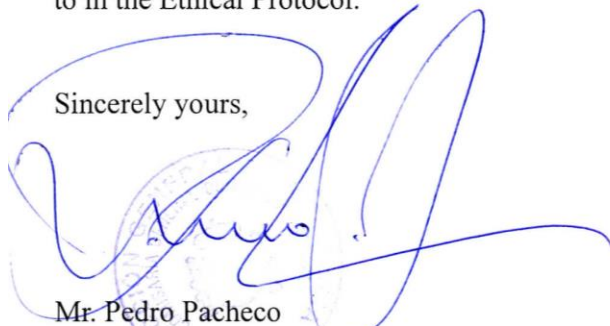
Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of the Spanish National Police, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of the Spanish National Police that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,



Mr. Pedro Pacheco
Chief of the Information Security Investigations
Cybercrime Unit
ppacheco@policia.es



Date: 28/04/2017

University of Kent,
Darwin Road
Canterbury
CT2 7NZ

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of the University of Kent, have read, understood, and am committed to adhering to the ethical principles outlined in the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of the University of Kent that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Darren Hurley-Smith".

Darren Hurley-Smith [d.hurley-smith@kent.ac.uk]

Dipartimento di Elettronica, Informazione
e Bioingegneria

POLITECNICO DI MILANO



Milano, 25/3/2017

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of POLIMI, have read, understood, and am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of POLIMI that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive and clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,



Prof. Stefano Zanero

Politecnico di Milano
Dipartimento di Elettronica, Informazione e Bioingegneria

Piazza Leonardo da Vinci 32
20133 Milano
Tel. +39 02 2399 3400 02 2399
5404/5406
PEC pec@elb@cert.polimi.it
www.elb.polimi.it
Partita Iva: 04376620151
Codice fiscale: 80057930150



Date: 28/04/2017

Polícia Judiciária
UTI/APIC
Rua Gomes Freire n.º174
1169-0007

Subject: Letter of compliance for RAMSES Ethical Protocol

This is to confirm that I, as a representative of Polícia Judiciária, am committed to adhering to the ethical principles outlined the RAMSES Ethical Protocol (deliverable D1.5 of the RAMSES project) in all research activities that form part of the RAMSES project.

I also confirm that it will be requested of all who work on the RAMSES project, on behalf of Polícia Judiciária that they read the Ethical Protocol and commit to adhering to stated principles in all research activities.

I will ensure that members of staff have the opportunity to ask questions if needed, and that they will receive clear and unambiguous answers, and further guidance if needed. In addition to keeping the Ethical Protocol accessible for members of staff (e.g., on a shared drive) I will ensure that they will also have access to other ethical documents, as are referred to in the Ethical Protocol.

Sincerely yours,

Berta Santos



Polícia Judiciária
Chefe de Área
Área de Projetos Inovação e Conhecimento

ANNEX E – RECORD OF ETHICAL APPROVALS SOUGHT

The following is a list of bodies that partners have contacted to date for the purpose of obtaining ethical approval. This Annex is a living document and will be updated as approvals are granted and further information is received from partners.

National body	Partners represented	Approval sought	Date granted
Department of Ethics, <i>Politecnico di Milano, Italy</i>	POLIMI RISSC	April 2017	Pending
Data Protection Department, <i>UCM</i>	TREE UCM Spanish National Police	April 2017	Pending
Data Protection Officer, the <i>Hochschule für den öffentlichen Dienst in Bayern.</i>	BayFHVR USAAR	April 2017	Pending
Data Protection officer, <i>Ministério da Justiça</i>	MJ, Portugal	April 2017	Pending
Department of Ethics, <i>The University of Kent</i>	TRI University of Kent	April 2017	Pending