



# TALER

## Taxable Anonymous Libre Electronic Reserves

Project number: Horizon Europe 101135475

### D1.1

### Data Management Plan

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Eindhoven University of technology  
[www.taler.net/eurotaler](http://www.taler.net/eurotaler)

Revision 1.3

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|--------------------------------------------------------------------|---------------------------------------------------------------------------------------|---|
| Dissemination Level                                                |                                                                                       |   |
| <b>PU</b>                                                          | Public                                                                                | X |
| <b>PP</b>                                                          | Restricted to other programme participants (including the Commission services)        |   |
| <b>RE</b>                                                          | Restricted to a group specified by the consortium (including the Commission services) |   |
| <b>CO</b>                                                          | Confidential, only for members of the consortium (including the Commission services)  |   |

| HISTORY OF CHANGES |                     |                                                                           |
|--------------------|---------------------|---------------------------------------------------------------------------|
| VERSION            | PUBLICATION<br>DATE | CHANGE                                                                    |
| v0.9               | 01 May 2024         | First version completed                                                   |
| v1.0               | 24 May 2024         | Internal review at TUE                                                    |
| v1.1               | 27 May 2024         | First circulated version                                                  |
| V1.2               | 27 May 2024         | Minor edits following review by HODI                                      |
| V1.3               | 15 Sep 2025         | Changes to phrasing on data on usability studies following review meeting |

# Data Management Plan

Heloise Vieira

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Revision 1.3

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### **Abstract**

This deliverable details the plan for data management for the project, including specificities on TALER's storage and treatment of personal information for third parties involved in the process and the specific needs from stakeholders to the extent applicable.

This deliverable will be updated throughout the lifetime of the project.

**Keywords:** Data Protection, Data Management, Open Access



# Chapter 1

## Introduction

The aim of GNU TALER is to offer payment services for the whole European market and thus puts particular emphasis's on making the system safe while guarding the users and merchants' private data. The TALER project is a pilot to bring this system to market.

GNU TALER will cater to a wide variety of users, including seniors, vision impaired people, people not speaking English, etc. To achieve a good user interface the development will involve human participants to test the interface. They will participate with informed consent. The project will not collect personally-identifiable information. In the context of the previously mentioned usability tests, TALER will engage with participants with vision conditions or other health-related conditions, in order to ensure the best user experience for related users. In this context, TALER is not processing special categories of data, but only collects anonymized information that would assist the consortium in providing a better user interface experience for related audiences.

Banks are legally required to collect Know-Your-Customer data on its users. Hence, once GNU Taler is operational at banks, they will process personal data which may also include data on criminal convictions, current sanctions, etc. This data is stored safely under the strict privacy rules that are in place for banks. GLS has decades of experience in managing such data. This data is not part of the TALER project but we nevertheless cover the considerations in this document. See the compliance entry for details.

TALER produces data in the form of research papers, usability studies, software, and personal profiles.

We acknowledge that in the context of TALER a partner (BFH) is based in Switzerland. Thus, the data processing activities that will involve this partner will include the import/export of personal data from EU to this country. As regards Switzerland, the European Commission has so far recognized this country as providing adequate protection with the Decision 2000/518/EC. According to Article 96 GDPR, international agreements involving the transfer of personal data to third countries which were concluded prior to May 2016 shall remain in force until amended, replaced or revoked. Thus, this decision is still valid. The effect of this decision is that personal data can flow from the EU to Switzerland without any further safeguard being necessary.





## Chapter 2

# Data management Plan

### 2.1 Research Papers

Published papers and preprints are made available via the project website <https://taler.net/de/ngi-taler.html>, they will also be posted to the Open Access repositories for security or cryptography (depending on the topic of the publication), and made available via the institutional repositories, thus fulfilling the Open Access Requirements.

Data for used experiments will be made available along with the papers unless the data concerns simple benchmarking data which is more concisely provided via publishing the benchmarked software, see section 2.4 on software.

Public deliverables will be published on the project website and made available to the general public in open access and free of charge.

### 2.2 Usability Studies

In the context of NGI Taler’s usability studies, participants will complete a registration form prior to the study, which records only their name and age-group confirmation. These forms are stored securely by ESEN and are accessible solely to a designated officer (“ESEN Registrations Officer”). The sole purpose of collecting these registration forms is to maintain records demonstrating compliance with the standards of the European Commission. On the day of the study, participants complete a survey. No personal identification codes or other identifiers, such as participants’ names, are collected at this stage. Responses are gathered mainly through predefined answer options, with the possibility of free-text input for certain questions. Importantly, the “ESEN Registrations Officer” does not take part in conducting or processing the surveys. This separation of responsibilities among ESEN staff members ensures that survey responses cannot be linked back to individual participants, thereby minimizing the risk of identification. All raw questionnaires are deleted once the GNU Taler Usability Scale Report has been finalized. Only aggregated statistical data is retained.

The consortium will ensure the processing and handling of these personal data will be fully compliant with relevant legislation. In particular, the following regulation is of relevance in this context: Regulation (EU) 2016/679-680 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation: GDPR). The national laws for data protection will be taken

into account by TALER partners who will run tests with end-users in real environments. If required, National Data Protection Authorities will be notified about the data collection. The collected data will be limited and relevant to what it is necessary related to the purposes of TALER activities. Under no circumstances is the data forwarded to third parties without the consent of those concerned. Each institution will name a DPO responsible for the data collection and insuring the respect of GDPR.

## 2.3 Bank regulations

The registration of new customers (consumers and merchants) at banks falls under their regular processing and requires Know-Your-Customer procedures. These are not part of the NGI TALER project and no other partner will have access to the information. We detail the case of GLS Bank following German law and regulations; Magnet Bank has their own procedures following Hungarian law and regulations.

The following are excerpts of GLS's data protection notice, further details can be found under <https://www.gls.de/privatkunden/datenschutz/>

Relevant personal data processed by GLS are personal details (name, address and other contact data, date and place of birth and nationality), identification data (e.g. ID card data) and authentication data (e.g. specimen signature). In addition, this may also include order data (e.g. payment order, securities order), data from the fulfillment of GLS's contractual obligations (e.g. turnover data in payment transactions, credit line, product data [e.g. deposit, loan and custody business]), information about customers financial situation (e.g. creditworthiness data, scoring/rating data), and data on your creditworthiness. (e.g., creditworthiness data, scoring/ rating data, origin of assets), advertising and sales data (including advertising scores), documentation data (e.g., consulting log), registry data, data about customers use of the telemedia we offer (e.g., time of accessing our websites, apps or newsletters, pages clicked on by us or entries), and other data comparable with the aforementioned categories.

GLS processes personal data in accordance with the provisions of the European Data Protection Regulation (GDPR) and the German Federal Data Protection Act (BDSG). As a bank, GLS is also subject to various legal obligations, i.e., statutory requirements (e.g., German Banking Act, German Money Laundering Act, German Securities Trading Act, German tax laws) and banking supervisory requirements (e.g., of the European Central Bank, the European Banking Authority, the Deutsche Bundesbank, and the German Federal Financial Supervisory Authority). The purposes of processing include, among others, creditworthiness checks, identity and age checks, fraud and money laundering prevention, the fulfillment of control and reporting obligations under tax law, and the assessment and management of risks. Within the bank, the customers data is accessed by those departments that need it to fulfill their contractual and legal obligations. With regard to the disclosure of data to recipients outside the bank, it should first be noted that, under the General Terms and Conditions agreed between the customer and GLS, the bank is obliged to maintain confidentiality about all customer-related facts and evaluations of which we become aware (banking secrecy). GLS may only

pass on information about customers if this is required by law, if customers gave their consent or if the bank is authorized to provide banking information. Under these conditions, recipients of personal data may be, for example:

- Public bodies and institutions (e.g. Deutsche Bundesbank, Bundesanstalt für Finanzdienstleistungsaufsicht, European Banking Authority, European Central Bank, financial authorities) if a legal or official obligation exists.
- Other credit and financial services institutions or comparable institutions to which GLS transmits personal data in order to carry out the business relationship with you (depending on the contract: e.g. companies of the Volksbanken Raiffeisenbanken cooperative financial group, correspondent banks, custodian banks, stock exchanges, credit agencies). Some R&D work will be carried out at Bern University of Applied Sciences (CH) which hosts one of the key developers of GNU Taler. The activities will conform to the ethics norms of the EU.

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## 2.4 Software

Source code and experiment descriptions will be versioned in Git repositories hosted on servers with redundant hard-drives and daily remote backups. TUE will be responsible for hosting the research and development servers with BFH providing servers for off-site backups. TSYS is dedicating staff to ensure daily backups happen to the off-site location. Performance data collected from scalability experiments might be too large to be persisted, but we will ensure reproducibility of the experiments by using deterministic builds to minimize potential impacts from data loss. Collected scientific data will be stored in SQL databases with proper meta-data annotations on all tables and columns to make it easy for others to find, access, identify and process the collected data.

New software releases of the GNU TALER software will be made publicly available and is fully open access.

Software of research projects in WP5 such as proof-of-concept demonstrators will be published along with the scientific papers. Software developed for implementing cryptographic building blocks be made available for general use and included in the benchmarking platform [eBACS](#).

## 2.5 Personal Data of TALER Wallet Users

GNU TALER users' private information is processed by TSYS and the privacy policy can be found at <https://git.taler.net/exchange.git/tree/contrib/exchange-pp-v0.rst>. Below, we copy the most relevant information on the users' data:

We do our best to not collect any Personal Information from Taler Wallet users. We believe that the Taler Wallet never transmits personal information to our services without at least clear implied consent, and we only process and retain information with a strict business need. That being said, when using our Services, we inherently have to collect the following information:

- Bank account details necessary when receiving funds from you to top-up your wallet or to transfer funds to you when you are being paid via Taler. At the current experimental stage, only the pseudonym and password you entered in the bank demonstrator is stored.
- The amounts being withdrawn or deposited, with associated unique transaction identifiers and cryptographic signatures authorizing the transaction. Note that for purchases, we cannot identify the buyer from the collected data, so when you spend money, we only receive non-personal information.
- When you contact us. We may collect certain information if you choose to contact us, for example to report a bug or other error with the Taler Wallet. This may include contact information such as your name, email address or phone number depending on the method you choose to contact us.

The privacy Policy also states how the merchants' information is stored:

We may share your Personal Data or other information about you only if you are a merchant receiving income, with your bank, to the degree necessary to execute the payment.

We retain Personal Data to transfer funds to the accounts designated by our users. We may retain Personal Data only for as long as mandated by law and required for the wire transfers.

We primarily use the limited information we receive directly from you to enhance the Taler Wallet. Some ways we may use your Personal Information are to: Contact you when necessary to respond to your comments, answer your questions, or obtain additional information on issues related to bugs or errors with the Taler Wallet that you reported.

## 2.6 TALER ICH

TALER Integration Community Hub (ICH) uses personal data in the form of personal profiles. Regarding the handling of data for this Hub, the [Privacy policy](#) will collect the following data:

We collect information from you when you register on our site and gather data when you participate in the forum by reading, writing, and evaluating the content shared here. When registering on our site, you may be asked to enter your name and e-mail address. You may, however, visit our site without registering. Your e-mail address will be verified by an email containing a unique link. If that link is visited, we know that you control the e-mail address.

The personal data collected in the context of TALER ICH, based on their category and the purpose for which they are collected, are retained for specific time periods, which are described in TALER ICH privacy policy. The privacy policy states as well that no information will be sold, traded, or transferred with identifiable information.

Only non-identifiable information might be used to share with other partners for matters of site improvement and marketing and only necessary cookies are placed on the ICH website.

## 2.7 Open Call Applications

All applicants will be required to consent to data processing by NLnet. NLnet specifically requests applicants to consent with data sharing with the consortium members and the independent evaluators. Additionally, the European Commission might request some private data for their own accountability, which will be granted if requested; this potential use of data is also clear from the application form and specifically included in the applicants' consent form.

On the partners, evaluators and EC side, NLnet requests them to not retain or shared any information without the party's specific consent.

Since confidentiality is a critical aspect of the trust relationship we have with projects, at no point in time will proposals be shared with third parties without explicit permission, not even partners within NGI TALER. Sometimes opportunities will arise outside of the context of this fund, or there is a potential to support an application in some other way.

At the time of submitting the proposal, applicants either grant NLnet Foundation the right to keep any information submitted on record – should future funding opportunities arise – or not. When the latter option is selected, NLnet will remove the information associated with the proposal if it is not successful. If they chose to allow NLnet to keep the information at hand, NLnet may at some point in the future bring them into contact with others, but again only after explicit written consent from applicants.

## 2.8 Newsletter

When data subjects register on our newsletter, they provide their email address and give their consent for NGI TALER to contact them to communicate to them related news items related to the mission of the consortium, such as events, future funding calls and more. When registering, data subjects may provide for their name too, if they decide so. The provided e-mail address is verified by an email containing a unique link, so that NGI TALER can verify the validity of the registration of the e-mail address. When data subjects subscribe to our newsletter, we shall retain your email address until you withdraw your consent or you ask us to delete your email address from it, in accordance with the applicable data protection rules, such as Regulation 2016/679 and Directive 2002/58 as amended.