| DELIVERABLE D7.2 |
| Report of first evaluation of SMOOTH platform |

H2020-DS-08-2017: Digital Security Focus Area

Project No.786741

Start date of project: 01-05-2018

Duration: 30 months

Revision: 03

Date: 02-12-2019

Document Information

Document Name: Report on the first evaluation of the SMOOTH platform

WP7 – Demonstration, piloting, and market validation (PILOT)

Task 7.3

Revision: 03

Revision Date: 02/12/2019

Author: Raquel Carro Taboada, Alexandre Pereda

Dissemination Level

Project co-funded by the EC within the H2020 Programme		
PU	Public	X
PP	Restricted to other programme participants (including the Commission Services)	
RE	Restricted to a group specified by the consortium (including the Commission Services)	
CO	Confidential, only for members of the consortium (including the Commission Services)	

Approvals

	Name	Entity	Date	Visa
Author	Raquel Carro	FBA	25/11/2019	✓
WP Leader	Raquel Carro	FBA	25/11/2019	✓
Coordinator	Rosa Araujo	EURECAT	02/12/2019	✓

Document history

Revision	Date	Modification
Version 1	25-11-2019	V1
Version 2	29-11-2019	V2
Version 3	02-12-2019	V3

List of abbreviations and acronyms

Abbreviation	Meaning
GDPR	General Data Protection Regulation
MEnt(s)	Micro-enterprise(s)
SME(s)	Small and medium-sized enterprise(s)
MoU(s)	Memorandum of Understanding

Executive summary	This document presents the description of the pilot and results of the evaluation of the first version of SMOOTH platform, the results of the recruitment strategy up to this point and how the platform plans to incorporate the feedback to its interim release at month 25.

Index

1.- Introduction

1.1.- Purpose

This report describes the results of the first testing of the platform by the MEnts and their assessment and feedback received.

The **101 MEnts** recruited through the strategy set by the SMOOTH partnership, performed the first evaluation and assessment of the performance and usability of the SMOOTH platform (WP6) after the integration of the different technologies developed (WP3, WP4 and WP5)

This first pilot tested an interim version of the platform in the period M16-M19 (August – November), just after the first version of the technological modules has been delivered.

This testing has run in parallel with the delivery of the first version of SMOOTH platform (M18).

Using the feedback from this pilot, the SMOOTH platform will be fine-tuned before the implementation of the second pilot at M25 (WP6).

1.2.- Scope

This first pilot evaluated the user's experience by means of trials in controlled laboratory conditions using both quantitative and qualitative methods (questionnaires and interviews), aimed at ensuring that the User Experience (UX) metrics defined for each sector are met. The trial included real users interacting with the online tools under the supervision of a cognition and human factors specialist, while registering the self-reported and physiological indicators of the relevant metrics identified in the requirements phase.

2.- Recruitment strategy and results after 1st round of testing

As it was already described in detail in D.7.1., SMOOTH plan was to recruit companies to become beta-testers of the SMOOTH platform in two testing phases:

1. First SMOOTH Pilot: Months 16-18,
2. Second SMOOTH Pilot: Month 25-27.

This section describes the **recruitment results and strategy for the first of these two interim evaluations**, where the objective was to recruit at least **60 MEnts** for the SMOOTH pilot program, so the recruited companies would iteratively test the SMOOTH platform in its first version after integrating the different modules, in order to evaluate and assess the performance, usability and reliability of the platform.

In order to get accurate feedbacks, the consortium envisaged to recruit companies from different general sectors; traditional companies (20), digital (20) and companies processing sensitive personal information (20).

Finally, after beta-testing, the consortium will conduct a market assessment during the last 3 months of the project involving at least 500 MEnts for testing and assessing the final version of the platform in a pre-production environment.

In this first pilot, there were **three different modalities of participation** planned, with different incentives within each of them (see section 2.1. for specifics):

- **Modality 1:** Participants complete the Entry Questionnaire at the SMOOTH platform.

- **Modality 2:** Participants complete the Entry Questionnaire and accompanying Experience Evaluation Survey (UEES).

- **Modality 3:** Participants complete the Entry Questionnaire and accompanying Experience Evaluation Survey (UEES) during a Skype meeting with one of EURECAT researchers**.**

2.1.- Recruitment Strategy

SMOOTH focuses on micro-companies from 3 specific verticals, and their participation during the lifetime of the project is crucial.

In order to conduct an efficient recruitment, ESBA and FBA implemented a series of **Dissemination (WP8) activities as main tool in their recruiting strategy**, where the channels used for this first interim evaluation have been the PROJECT AND PARTNERS COMMUNICATION CHANNELS (see section 2.2).

The beta-testing process was launched as soon as EURECAT confirmed that all modules were functional for testing, providing the link to access the Entry Questionnaire (EQ), and that the User Experience Evaluation Survey (UEES) was also ready.

The **process established to involve the companies that joined the pilot through FundingBox Platform was** structured as follows:

A. Prioritisation of Beta-Testing spots:

- The partnership decided that the companies who agreed to participate in the algorithm testing phase (previous to this 1st pilot), and which already had signed Partnership Agreements with the SMOOTH project, would be prioritized when assigning the beta-testing spots; these were 17 companies (linked to the SMOOTH supportive partners), and are detailed in the table hereunder:

	COMPANY
1	THE SUPER DRIVER
2	BLAUMAC
3	ENCONTROL BALTIC SIA
4	WOOD INDUSTRY CLUSTER
5	PUBLD MOBILE APP SL
6	BRIVA
7	DOKUSARE
8	SU.ME.TRA. S.R.L.
9	PIMP YOUR BODY
10	LUNACOM SNC
11	WEIRDSTUDIO
12	CERI INFORMATICA & TECNOLOGIA
13	CAMERRA SILVANO SRL
14	ANDREA BEAUTY SPA S.R.L.
15	GAIANIGO FRATELLI SRL
16	SOULTOWN KINEMA
17	DIGIOTOUCH OU

Table 1. Companies that signed Partnership Agreements with SMOOTH

The template of the Partnership Agreements signed is available at **Annex I.**

- In second place, the companies that had already expressed their interest in the project since its beginning by registering through the call opened at https://smooth.fundingbox.com/ were also prioritised;

- After all the companies under the two previous categories where contacted, the rest of the spots were assigned on a first come-first served basis until the feedback gathered from them reached the objectives set, or the timeframe established for the first pilot was consumed.

B. Policy of incentives:

Depending on the modality of participation chosen (out of the three planned), the beta-tester would get different gratifications, specifically:

- **Modality 1:** Participants that complete the Entry Questionnaire at the SMOOTH platform on their own**.**
  Gratification: **1-year free subscription** to the SMOOTH platform (6 reports).

- **Modality 2:** Participants complete the EQ and accompanying User Survey on their own**.**
  Gratification**: 60€ Amazon voucher** (20€ now and 40€ in Jul-20, or 60€ in Jul-20) + **1-year free subscription** to the SMOOTH platform (6 reports).

- **Modality 3:** Participants complete the EQ and accompanying User Survey during a Skype meeting with one of our researchers**.**
  Gratification: **100€ Amazon voucher** (30€ now and 70€ in July-20) + **1-year free subscription** to the SMOOTH platform (6 reports).

C. **Follow-up of the participants' feedback:**

An Excel was shared in SMOOTH's SharePoint to be used as follow-up tool of the recruitment results, as well as the implementation of the pilot. The information it contains is:

> A. Companies contacted
> B. Usernames/passwords sent
> C. Information and feedback sent by the companies.
> D. Type of Data provided by the companies (modules involved).

Figure 1. SMOOTH 1st pilot – follow-up tool

D. **Recruitment process:**

The recruitment for this pilot builds on all the recruitment actions implemented previously, hence first the companies who agreed to participate in the algorithm testing phase, as well as those already subscribed through FBOX, where contacted by email through info@smoothplatform.com

Dear participant,

After one year of intense work and technological development, a first version of our platform is finally ready to be test by you!

The time has come to get your company compliant with GDPR by testing the first beta version of the SMOOTH platform!

We have set the following step by step procedure for you to get your Initial Findings GDPR Compliance Report:

1. *Confirm you are still interested in participating in the SMOOTH Pilot by answering to this e-mail affirmatively, **indicating the main country in which your company operates.***
2. *We then will send you a username and password to access the system.*
3. *You should complete by October 15th the following information:*
   a. *Fill in the Entry questionnaire, available in 4 languages: English, Spanish, Latvian and Italian.*
   b. *Upload the following documents in **.doc, .pdf, .xls or csv format. No scanned version otherwise our algorithm will not be able to process it.***
      - *Inform of consent*
      - *Privacy policy*
      - *Cookies policy*
      - *Customer database*
      - *Providers database*
   c. *User Experience Evaluation Survey.*

Once these 3 steps have been completed you will get:

- *A one-year free subscription to the Smooth GDPR compliance software.*
- *An Initial Findings GDPR Compliance Report* (by Mid-December at the latest), were the main findings regarding your compliance will be stated, so that you can improve and send your updated information to Smooth until you get your company fully compliant with the new Data Protection regulations.*

*Please note that only 60 beta-testing spots are available, and they will be assigned on a first come, first serve basis. **Don't wait to confirm your participation!***

Feel free to ask any questions or request support through the SMOOTH COMMUNITY.

King regards,

SMOOTH Project

*Bear in mind that the comprehensiveness of the findings of this Report depends on the quality of the information provided / uploaded to the platform.

When the companies contacted confirmed their interest in participating in the pilot, **EURECAT activated the codes relevant** username/password **which then ESBA/FBA shared one by one with**

the companies and updated the follow-up tool on SharePoint. The communication can be seen hereunder:

Dear participant,

Thank you for agreeing to be one of the SMOOTH beta-testers!

*You can now **access the system** here with the following Username and Password:*

- *Username xxxx*
- *Password xxxx*

In order to complete the beta-testing process, you should provide the following information by October xx^h:

a. *Entry questionnaire*
b. *Upload data bases / privacy related documents required by the system*
c. *Fill in the User Experience Evaluation Survey*
   This survey is designed to accompany the completion of SMOOTH's Entry Questionnaire. We'd be extremely grateful if you could complete this survey by keeping it in a contiguous tab in your browser, and accessing it each time you complete each of the 10 blocks in the Entry Questionnaire.

*In addition, we are also willing to schedule an **in-person (online) session.** If you go through the Entry Questionnaire while being remotely accompanied by one of our testers, we will reward you with a **30 euros Amazon voucher!** We just need that you share your screen through Skype.*
Please send us an e-mail if you wish to request such a session.

Thank you for your patience up until this point, as this is a learning experience for all of us, we have the best interest in improving smoothplatform.eu as much as possible thanks to your feedback, in order to in turn provide the best service to companies like yours.

Feel free to ask any questions or request support through the SMOOTH COMMUNITY.

King regards,

SMOOTH Project

While contacting these already recruited companies, a series of dissemination actions were implemented (see section 2.2) in order to involve new companies. These new companies subscribed through FBOX platform to participate in the pilot, and then were contacted through info@smoothplatform.com and received their username/password as well as the relevant instructions.

After the first participants showed some difficulty to fill in the User Experience Evaluation Survey, a **video tutorial was developed** by EURECAT and attached to the initial communication sent to the participants.
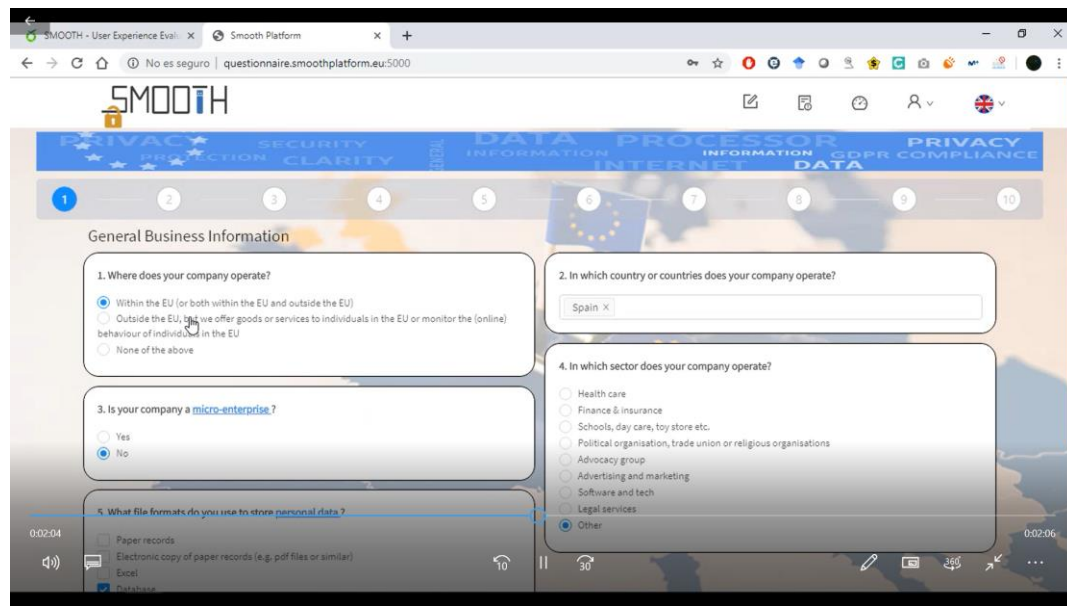
Figure 2. SMOOTH video tutorial

Also, in order to further encourage the companies to provide feedback, the communications where adapted, and more information on how the pilot worked was offered to the beta-testers:

SMOOTH: Beta Platform ready to be beta-tested

Dear participant,

Thank you for agreeing to be one of the SMOOTH beta-testers!

You can now access the system here with the following Username and Password:

- *Username: Ment_xx*
- *Password: SMOOTHxx*

In order to complete the beta-testing process, you should provide the following information by xx:

1. Entry questionnaire

2. Upload personal data / privacy related documents required by the system
- *Inform of consent*
- *Privacy policy*
- *Cookies policy*
- *Customer database*
- *Providers database*

3.Fill in the User Experience Evaluation Survey

Below, we provide further detail on how to participate in the pilot:

The evaluation process consists of two stages, *in the first stage (ongoing) we collect the answers to the* ***Entry Questionnaire (EQ)*** *and in the second (July 2020) we will assess your comprehension of the* ***compliance report*** *generated from your responses to the EQ, which summarizes all the steps your company needs to take in order to fully adapt to the GDPR.*

There are three different modalities of participation in this Pilot*. You have to choose which modality you prefer to participate in advance, note that each modality entails different gratifications, specifically:*

- *Modality 1: Participants complete the EQ on their own. Gratification: **1-year free subscription** to the SMOOTH platform (6 reports). Estimated duration 30-45 minutes.*
  In this modality you simply need to complete the Entry Questionnaire at the SMOOTH platform

- *Modality 2: Participants complete the EQ and accompanying User Survey on their own. Gratification: **60€ Amazon voucher** (20€ now and 40€ in Jul-20, or 60€ in Jul-20) + **1-year free subscription** to the SMOOTH platform (6 reports). Estimated duration 45-60 minutes*
  In this modality, in addition to the EQ, participants need to complete the accompanying User Experience Evaluation Survey (UEES), by keeping both open in contiguous tabs in your browser. The procedure is visually demonstrated at the attached video which we strongly recommend watching

- *Modality 3: Participants complete the EQ and accompanying User Survey during a Skype meeting with one of our researchers. Gratification: **100€ Amazon voucher** (30€ now and 70€ in July-20) + **1-year free subscription** to the SMOOTH platform (6 reports) Estimated duration 55-70 minutes. In this modality, participants schedule an in-person (online) session to go through the Entry Questionnaire while being remotely accompanied (by one of our testers (sharing their screen through Skype). If you go for this option please contact alexandre.pereda@eurecat.org to schedule a session.*

Links

Entry Questionnaire (EQ)

User Experience Evaluation Survey (UEES)

Whichever modality you choose, please do not hesitate to contact us at alexandre.pereda@eurecat.org should you have any doubts or queries about the Pilot. Thank you for your patience, as this is a learning experience for all of us, who have the best interest in improving smoothplatform.eu as much as possible thanks to your feedback, in order to in turn provide the best service to companies like yours.

Join the Smooth Community to access continuous support and updates!

Please note that the full compliance report as such will take a few weeks, but in the next days you will receive what has been detected by our analysis as the different modules produce their diagnosis.

Regards,

SMOOTH team

EURECAT provided feedback through the follow-up tool on who had completed the information (EQ and User Survey), so FBOX/ESBA could send reminders to those who hadn't, as well as keep disseminating the pilot to involve new companies in order to fulfil the indicators.

2.2.- Recruitment actions implemented

The dissemination and recruiting actions were implemented through the following channels:

A. The project Website and Social Media:

Dissemination materials available were updated in order to use them for the pilot recruitment dissemination, as can be seen hereunder.

Figure 3. SMOOTH banner for pilot recruitment actions

smoothplatform.eu allowed visitors to subscribe to the pilot in order to become beta-testers to the SMOOTH platform.
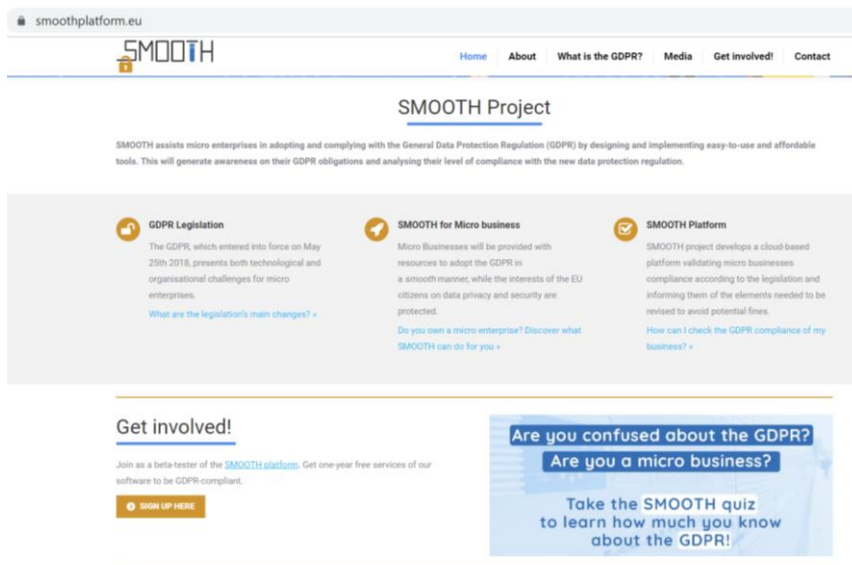
Figure 4. SMOOTH website – access to pilot

SMOOTH Social Media shared messages and information for the followers (131 on Twitter, 37 on LinkedIn - amongst which 32% are companies from 11 to 50 employees, 37 on Facebook and 100 on Instagram) to participate in the pilot, as well as for the partners to repost in their own Social Media.

Figure 5. SMOOTH twitter post regarding the participation in the pilot

All recruitment efforts were replicated through the SMOOTH community on FundingBox, with 244 members.
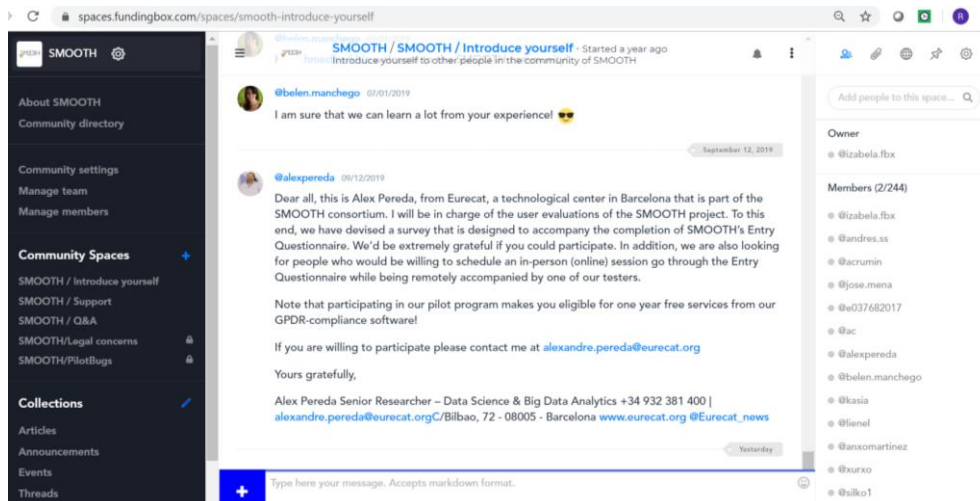
Figure 6. SMOOTH community – pilot recruiting communications

B. **The partners' channels:**

The Partners shared the pilot recruiting for beta-testers of the SMOOTH platform in their Social Media, as well as in the project's microsite within their websites, as it can be seen in the screenshots hereunder.
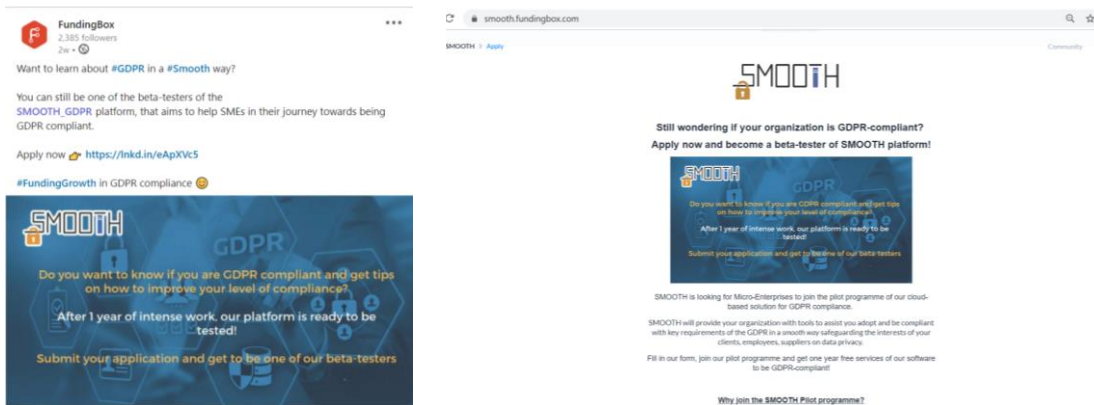
Figure 7. FundingBox post for beta-testers recruitment in their LinkedIn account as well as SMOOTH microsite

FundingBox and ESBA, both with a crucial role in the dissemination plans through its direct communication channels, **made specific mailing campaigns**: While the former contacted its database of 21.500 members (being around 53% of them SMEs), the latter contacted directly with Digital Innovation Hubs, as intermediaries to reach the target of Micro-Enterprises. This helped reach over 250 Digital Innovation Hubs from 25 different countries (see detail in **Annex II**), together with their affiliated members.

Out of the DIH contacted in June 2019, several of them showed interest in the project, so a presentation was sent for further information and conference calls held. An example of the results of the campaign is that the Centre for Research and Technology Hellas – CERTH, from Greece, signed a MoU to be Supportive Partner of the project, providing then the contacts of 6 companies which confirmed their interest in participating. Also, Digital Innovation Hub Vicenza showed interest, and made dissemination actions among the companies in their influence area (see materials in Figure 10), providing the contacts of 11 companies for recruitment, 9 of which signed a Partnership Agreement with the project.

This campaign lead as well to the interest in the pilot from several ESBA affiliated members, such as the Gibraltar Federation of Small Businesses, which provided the contacts of 8 companies interested in participating in the pilot.

Become GDPR-compliant through the SMOOTH Beta-Tester Programme

Dear xxxx,

SMOOTH is one of the projects led by FundingBox. It is a European initiative aiming at helping small businesses becoming GDPR-compliant.

*In September 2019, a British survey regarding GDPR delivered its verdict: more than a year after it came into effect, **52%** of the United Kingdom's businesses are **not fully compliant**.*

This difficulty of observing the new data regulation is not specific to the British Isles.

*As a matter of fact, companies from many other EU countries are facing the same challenge, and it's even more the case when it comes to **micro-enterprises who lack resources and expertise on the GDPR topic**.*

*This is where SMOOTH comes into action. The Programme is designing **easy-to-use and affordable tools to assess the level of compliance of small businesses**.*

If you recognise yourself as a micro-enterprise*, you can join the SMOOTH Beta-Tester programme and get one year of free services of our software to be GDPR-compliant.

Join the Beta-Tester Programme

Fines can reach up to 4% of your annual turnover, compliance starts now!

Looking forward to seeing your application :)

The FundingBox Team

P.S. If you have questions about the Programme or about your eligibility to participate as a beta-tester of the SMOOTH platform, please write us to info@smoothplatform.eu.

*Micro-enterprises are companies with less than 10 employees including self-employed people.

FundingBox

Fundingbox Accelerator Sp.z.o.o., Al. Jerozolimskie 136, Warszawa, 02-305

Unsubscribe - Unsubscribe Preferences

Figure 8. SMOOTH Pilot mailing sent to FundingBox database

SMOOTH: Beta Platform ready to be tested

Dear XXX,

After one year of intense work and technological development, the first version of our platform is finally ready to be tested by your companies! The time has come to get your company compliant with GDPR by testing the first beta version of the SMOOTH platform!

We have set the following step by step procedure for them to get their Initial Findings GDPR Compliance Report:

*1. Please, confirm how many companies are interested in participating in the SMOOTH Pilot by answering this e-mail **before the end of the week (4th October).** We have 4 spots reserved for your organisation at the moment. Please bear in mind that the companies will need to test the platform and provide feedback by October 15th.*

2. We will then send you a username and password for each of the companies for them to access the system

3. They will use the platform:

They will fill in the Entry questionnaire, available in 4 languages: English, Spanish, Latvian and Italian. The questionnaire consists off questions for our algorithm to understand their level of compliance. During the

questionnaire, they will need to upload some documents such as privacy policy, cookies policies, and databases.

4. They will need to fill in our User Experience Evaluation survey by October 15th.

Once these 4 steps have been completed, they will get:

An Initial Findings GDPR Compliance Report* (by Mid-December at the latest), were the main findings regarding your compliance will be stated, so that you can improve and send your updated information to Smooth until you get your company fully compliant with the new Data Protection regulations. *Bear in mind that the comprehensiveness of the findings of this report depends on the quality of the information provided/uploaded to the platform.

They will all get a one-year free subscription to the final SMOOTH GDPR compliance platform, once it is up and running.

During the entire process, we will support the companies through our SMOOTH COMMUNITY. They can register there individually!

King regards,

Figure 9. SMOOTH Pilot mailing sent to DIH database

Figure 10. SMOOTH dissemination material printed by one of the DIH contacted by ESBA
(Digital Innovation Hub Vicenza)

FundingBox and ESBA shared also the pilot on their Newsletters, with 21.500 and 4.220 ESBA subscribers respectively.

Featured communities

Connect, chat and discuss with entrepreneurs, funding experts and more

NGI Community	Smooth Platform	FundingBox Community
This community around the internet for humans just launched its Ambassadors' Programme.	Learn about GDPR in a smooth way. Be one of the beta-testers of the Smooth Platform. Join the pilot.	Best Knowledge, connections & opportunities for #FundingGrowth!
Join	Join	Join
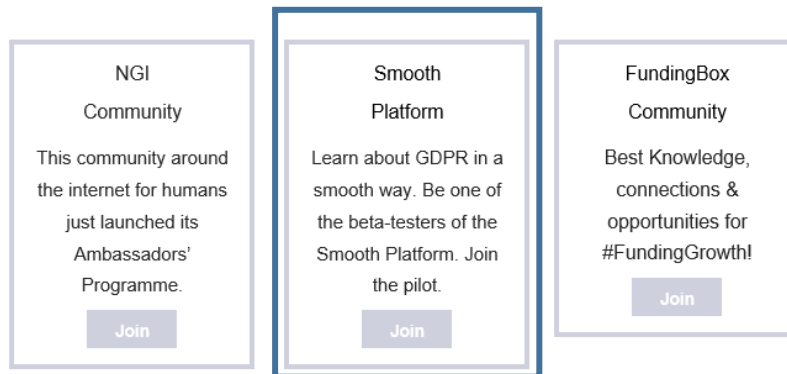
Figure 11. SMOOTH pilot in FundingBox Newsletter, included in the October and November editions.

2.3.- Relevant Metrics and results of recruitment

Up until the end of the 1st pilot, 286 applications were started and 161 submitted through https://smooth.fundingbox.com/. Out of these, and after the reminders and dissemination actions implemented in the last 3 months, 88 became part of the 1st pilot of the project.
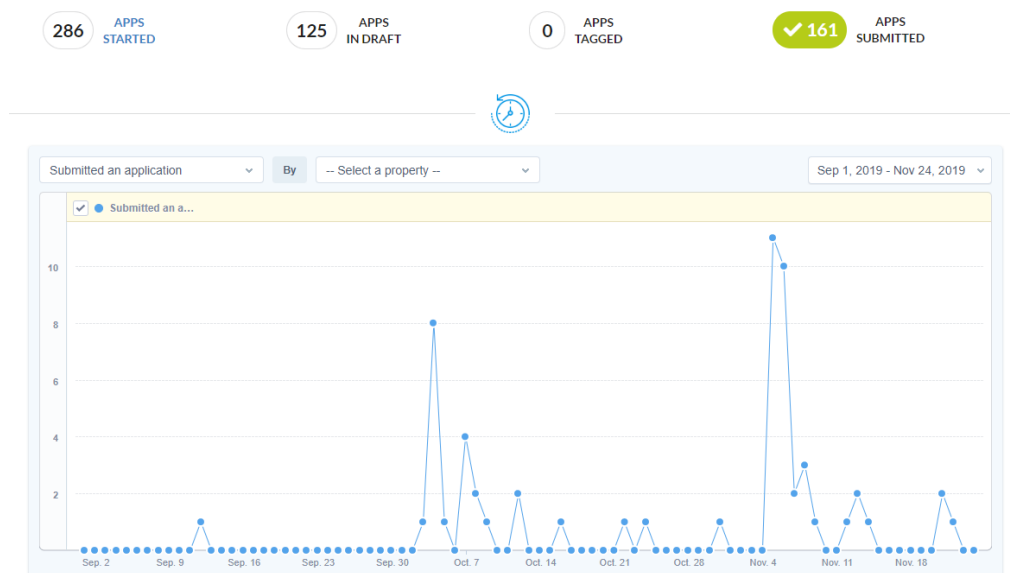
Figure 12. Final numbers, and distribution of applications submitted in the last 3 months (September-November 2019) through https://smooth.fundingbox.com/
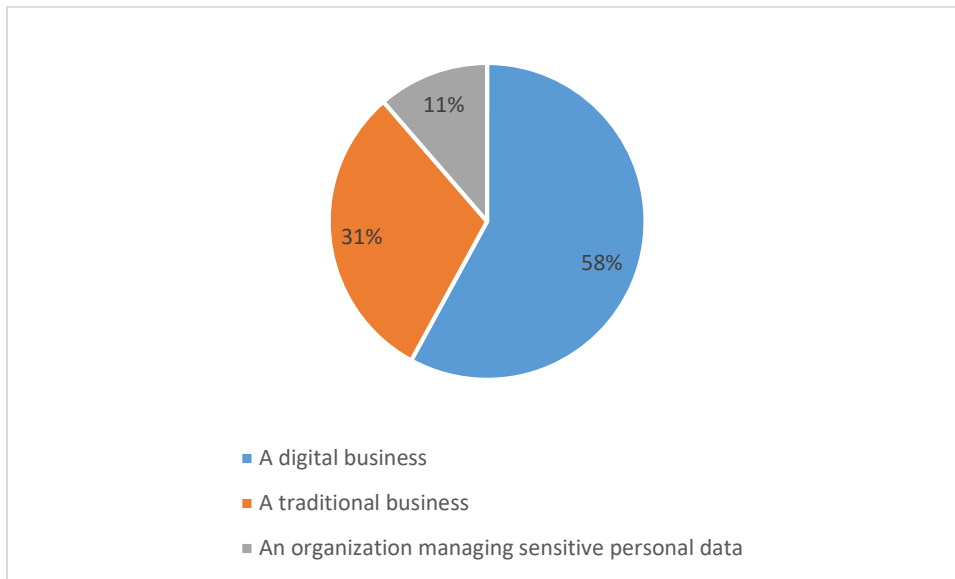
Figure 13. Companies that submitted their app through FundingBox that signed up to the pilot – per vertical

As can be seen above, more than a half of the companies had a digital business, while 31% had a traditional business (e.g.: retail shop, real estate agency, repair shop, restaurant, family business, etc.) and a 11% are organizations managing sensitive personal data (e.g.: pharmacists, doctors, psychologists, physiotherapists, services to LGBT community, money transfer businesses oriented to immigrants, etc.)
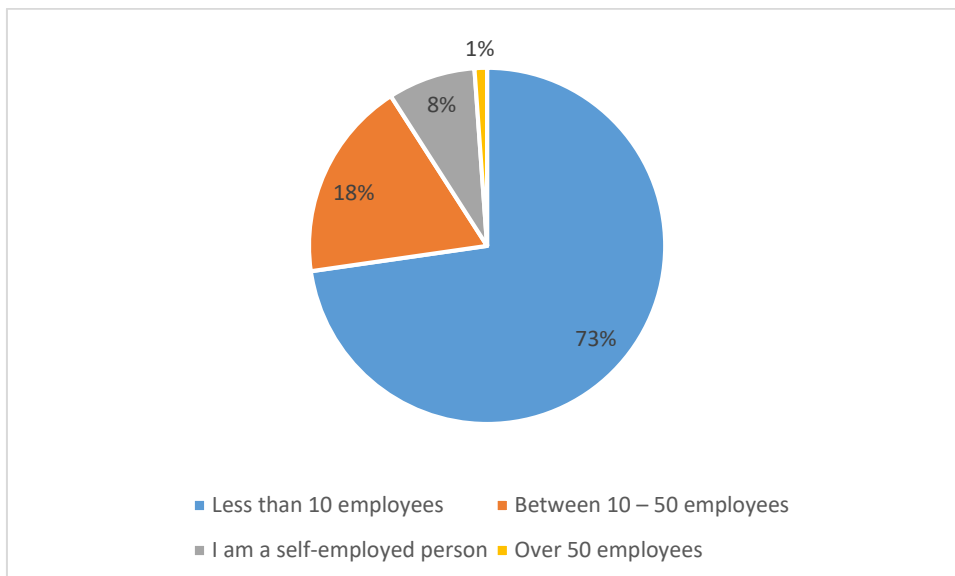
Figure 14. Companies that submitted their app through FundingBox that signed up to the pilot – per size

Also, some companies, which contacted through DIH and other small associations, didn't enter their data through FundingBox, and were directly contacted through email, signing up as beta-testers. These were 13 participants of the pilot.

In total, **101 companies signed up to the pilot, and 99 received their username and password**. Their distribution per country of origin can be seen hereunder.
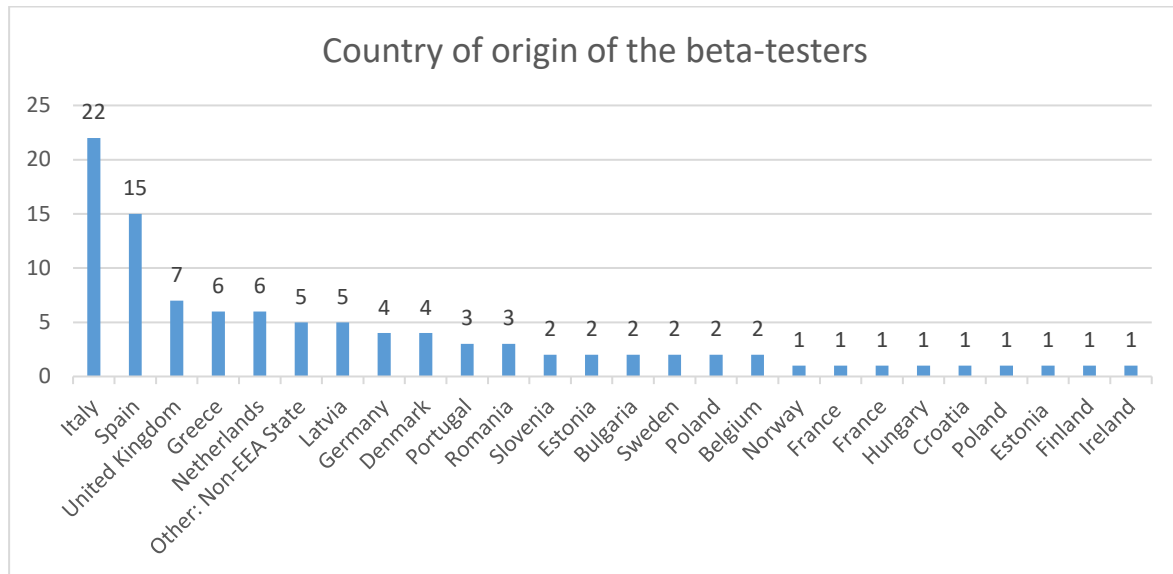
Figure 15. SMOOTH companies recruited for the 1st pilot.

Although 25 European countries are represented, **37% of the companies are Spanish and Italian.**

Out of the 99 companies to be beta-testers, a 29% provided feedback on the platform by filling in the complete Entry Questionnaire, and 21% filled in at least part of the Experience Evaluation Survey.

Also, 260€ in Amazon vouchers will be paid to 4 companies (50% for participating in modality 2 and 50% in modality 3).

For more details on the feedback received see section 3.2.

2.4.- Strategy planned for next pilot

For the next pilot, the same recruitment strategy will be followed, with two improvements, one internal and external, focused on the communication among the partners and with the testers:

A. **Internal communication:** In order to improve the communication among the partners and their capacity to address legal or technical issues, two private spaces, accessible only to the partnership, were created within the SMOOTH FundingBox Community:

- o **SMOOTH – legal concerns**: if a specific action might have a legal implication it will be posted here for the legal team to approve / clarify.
- o **SMOOTH – pilot bugs**: in this private space all issues encountered by the users during the pilots will be pasted here, for the technical partners to solve. This would allow access to the relevant technical staff for that particular issue in only one step.

B. **External communication**: a new and more integrated approach will be applied when communicating with the users, relying more on the SMOOTH FundingBox Community and less on the webmail, in order to gain efficiency and speed of response.

For this and based on the SMOOTH – pilot bugs private space previously mentioned, a FAQ document will be composed, frequently updated and made available to users through the SMOOTH – Support space. This Space will concentrate the communication of the users regarding the pilot, and any e-mail exchange will be redirected to this resource.

This measure is considered as essential in order to deal with a growing number of testers / users in an efficient and orderly manner.
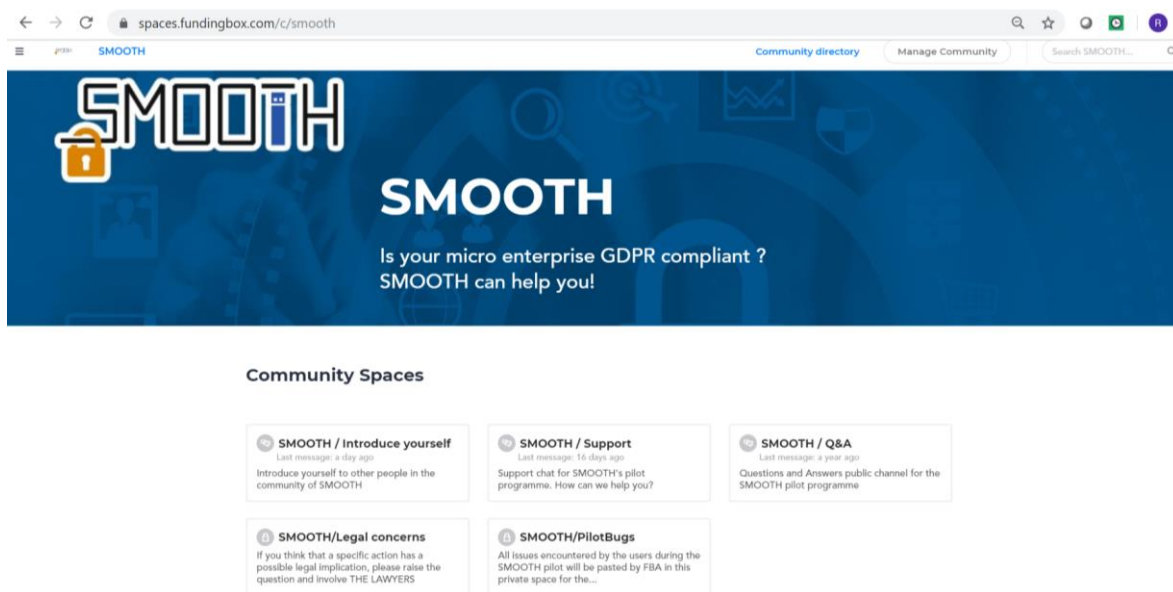
Figure 16. SMOOTH FundingBox Community - available spaces (public and private)

3.- Assessment of the platform by users

This section details the results of the first round of user testing, corresponding to the period M16-M19. The testing in the first pilot has run in parallel with the delivery of the first version of SMOOTH platform (M19), which has resulted in less overall input than we expected, and some learnt lessons that are explained in detail in Section 4.

As described in D7.1, the **first and second pilots include both online evaluations as well as trials in controlled laboratory conditions,** using both quantitative and qualitative methods (questionnaires and interviews). Note that Eurecat's UX laboratory is used only for a small subset of the participants, who complete the EQ and User Survey while physiological measures are registered. Participants in the "lab tests" have been recruited by Eurecat, they did not go through the FBOX platform recruiting scheme.

The second pilot will run during M25-M27. **Using the feedback from this pilot, we will fine tune the SMOOTH platform to deliver its final version at M27** (WP6).

The final iteration concerns the market assessment pilot and it will cover the last period of the project. In any case, these dates are to be taken as reporting deadlines, as **feedback will be gathered on a continuous basis** between M16 and M27.

3.1.- Evaluation strategy

The general strategy involved large scale remote testing of users while obtaining qualitative and behavioural (reading times) measures of usability, plus small controlled experiments with both qualitative, behavioural, and physiological measures. Regarding the physiological data, although we have already collected data from 10 participants, these will be reported with the results of the second pilot, once we have enough data for the analysis to produce significant results, which in physiological experiments, often requires a minimum of 20 to 30 participants

3.1.1. Relevant metrics and feedback sources

As described in D7.1., after a follow-up of the interface development and a first interim evaluation of its characteristics, it became obvious that the main aspects to evaluate regarding the usability of the interfaces are related to effectiveness, efficiency and comprehension. In this sense, usability goals to focus on are:

- effectiveness: the degree of success with which users achieve their task goals;
- efficiency: the time it takes to complete tasks;
- and satisfaction, that is, user comfort and acceptability; (see ISO 9241, part 11 'Guidance on Usability'[1]).

Although the focus will be on usability metrics, we will also obtain some measures of layout and design metrics. Specifically, **qualitative metrics** will include items for perceived aesthetics as

---

[1] International Organization for Standardization. (1998). ISO 9241—Ergonomic requirements for office work with visual display terminals (VDTs). Part 11: Guidance on usability. (available from www.iso.org/iso/en/CatalogueListPage.CatalogueList). Geneva, Switzerland; ISO.

proposed in the seminal study by Lavie and Tractinsky[2], while items for perceived usability will be extracted from a modification of the Post-study Usability Questionnaire[3]. On the other hand, **quantitative and physiological metrics** of mental load and frustration, and a more detailed analysis of response times, will also be obtained from both remote and lab users.

Regarding **feedback sources**, the main channel is provided by the recruitment process described in section 2: Users registered in the SMOOTH FundingBox Community, as well as on the various webinars and formative activities, are asked to provide feedback through a survey that is completed concurrently with the questionnaire, and through the registering of their completion times. The survey is described below, and it will be subsequently refined as the evaluations progress.

For the lab tests, local MENTS are recruited by Eurecat to come to their laboratory and carry supervised sessions were, in addition to the described metrics, qualitative feedback is obtained through supervised sessions including a think-aloud protocol.

The aggregated responses of all users are also a key source of feedback, allowing to check how frequent different response options are.

As explained in section 2, there are **three different modalities of participation**, plus an extra fourth modality which consists of completing the EQ in the lab, as explained above, users in this modality are tested in Eurecat's UX Lab:

- **Modality 1:** Participants complete the Entry Questionnaire at the SMOOTH platform on their own.
  - o   User metric obtained: Completion times (efficiency).

- **Modality 2:** Participants complete the Entry Questionnaire and accompanying User Experience Evaluation Survey (UEES).
  - o   User metrics obtained: Completion times, and qualitative feedback.

- **Modality 3:** Participants complete the Entry Questionnaire and accompanying Experience Evaluation Survey (UEES) during a Skype meeting with one of EURECAT researchers.
  - o   User metrics obtained: Completion times and qualitative feedback.

- **Lab tests:** Participants complete the Entry Questionnaire and accompanying Experience Evaluation Survey (UEES) during a laboratory session.
  - o   User Metrics obtained: Completion times, qualitative feedback, and physiological measures.

Note also that in all four modalities, completion of the EQ provides the platform developers extensive feedback for debugging purposes.

3.1.2. User Experience Evaluation Survey

After each block of the EQ, users are asked the following:

---

[2] Lavie, T., & Tractinsky, N. (2004). Assessing dimensions of perceived visual aesthetics of web sites. *International journal of human-computer studies*, *60*(3), 269-298.

[3] Lewis, J. R. (2002). Psychometric evaluation of the PSSUQ using data from five years of usability studies. *International Journal of Human-Computer Interaction*, *14*(3-4), 463-488.

1 – In a scale of 1 to 5 (with 1 being totally in disagreement, to 5 being in total agreement) indicate the degree to which you agree with the statement in the sentence:
- I have understood the purpose of this block of questions
- I consider the issues brought up in this block as very important to my business activity
- I found the questions in this block easy to understand
- All of the info required was easily available to me

2 – For those questions which weren't clear enough for you, please:
- Identify the questions.
- Describe generally what the problem was understanding each question
- Indicate any vocabulary that was not known for you.
- Indicate any other issues you found during the completion of this block.

After completion of the full EQ, the **general usability/aesthetics questions** are included:

3 - In a scale of 1 to 5 (with 1 being totally in disagreement, to 5 being in total agreement) indicate the degree to which you agree with the statement in the sentence:
- I think this questionnaire has a clean design
- I think the information is clearly presented in this questionnaire
- I think the design of this questionnaire is pleasant to look at
- I think the design of this questionnaire is practical/convenient
- I think it was easy to visually orient myself in this questionnaire
- I think this questionnaire is easy to use
- I think this questionnaire is easy to navigate

Finally, there are additional questions included at the end of the questionnaire, in order to conduct a **preliminary market assessment**:

1. What is your first idea to having a software solution that helps you comply with your GDPR obligations?
   - Very positive
   - Somewhat positive
   - Neutral
   - Somewhat negative
   - Very negative

2. What limitations do you perceive, if any, in the SMOOTH platform? Are there any aspects you are not convinced about?

   Open answer

3. Are you aware of similar platforms in the market? Which ones?

   Open answer

4. How likely is that you would recommend SMOOTH to your colleagues, peers, family members with a small business?

0- Not very likely to 5 extremely likely

5. In the future, would you be interested in paying for the services offered by SMOOTH?
   - Definitely yes
   - Probably yes
   - Neutral
   - Probably not
   - Definitely not

3.2.- Feedback from users and evaluation results

In the next three sections we will describe these **types of user feedback**:

- Responses to the multiple-choice questions in the UEES
- Qualitative feedback provided in the UESS and face to face sessions (skype and lab)
- Completion times for the EQ

3.2.1. Results of the multiple-choice questions in the UEES

A total of 21 participants (7 female) provided sufficient answers to the UEES to be analysable. Average age was 34.7 years old (+/- 8 years):

- Level of education: 8 had a postgraduate level, 11 graduates, and 2 had a secondary education level.
- Profession: 3 participants defined their profession as project manager, 4 cybersecurity analysts, 2 were CEOs of their companies, 2 entrepreneurs, 2 researchers, a dentist, a freelance, an autonomous worker, an architect, a consultant, a sound design engineer, a quality control specialist, and a sound designer.
- Regarding their self-perceived degree of literacy about digital media and privacy, the figure hereunder shows a moderately good and average degree respectively.

Digital and Privacy Literacy

Mean Scores
■ Digital Literacy ■ Privacy Literacy
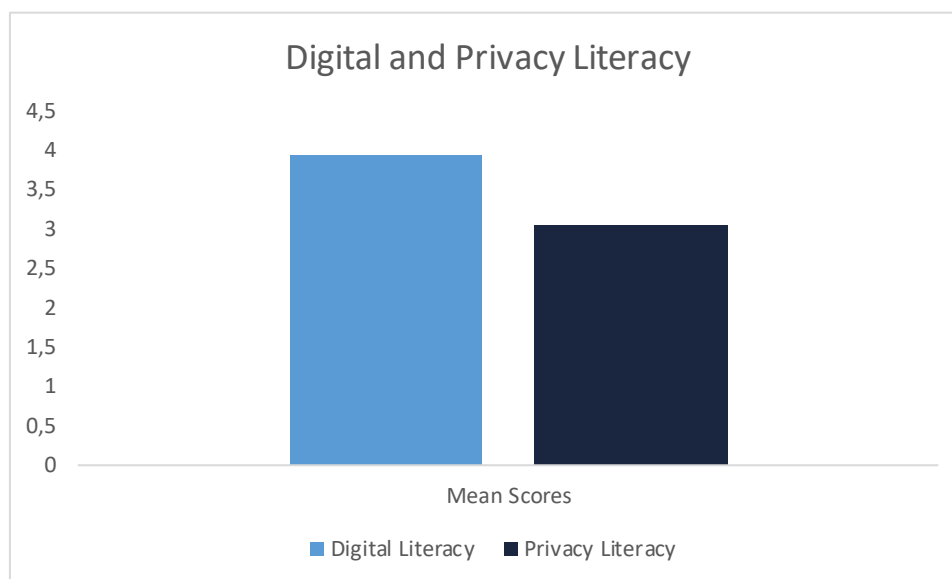
Figure 17. SMOOTH pilot – Self-perceived digital and privacy literacy

The following figures show each of four multiple questions made for each block, except blocks 6 and 10 to which these questions did not apply.

As described above, the four questions are related to:

- their understanding of the purpose of the block,
- the perceived importance of that block's questions to their business activity,
- the difficulty in understanding the questions,
- and the availability of the information needed to complete that block.
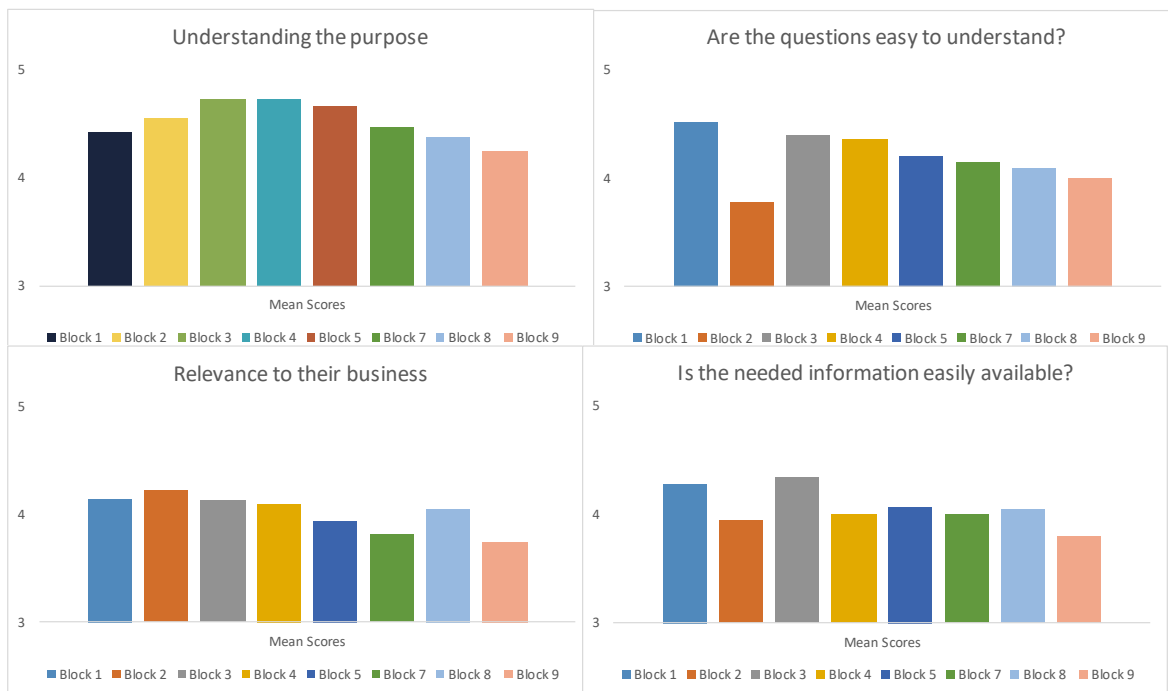
Figure 18. SMOOTH pilot – Responses to the multiple-choice questions about the blocks of the EQ

We can see that **in general the perception of the users on the four issues was mostly positive, with few scores below 4**, and all of them above average, especially in what regards understanding the purpose of the different blocks of questions.

Questions in block 2 score lower than average in both difficulties of the questions and availability of information, though this is not observed for blocks 3 and 4, which pose very similar types of questions. Also, the perceived relevance to their business of blocks 7 and 9 are below average, but as we will see in the qualitative answers, this is likely due to the heterogeneity of professional activities we already had in our sample.

Regarding UX metrics of aesthetics and usability, we can see in the next figure that scores, though still above average, are generally lower than the ratings of the question blocks, especially with regard to the attractiveness and the practicality and capacity to orient through the EQ.
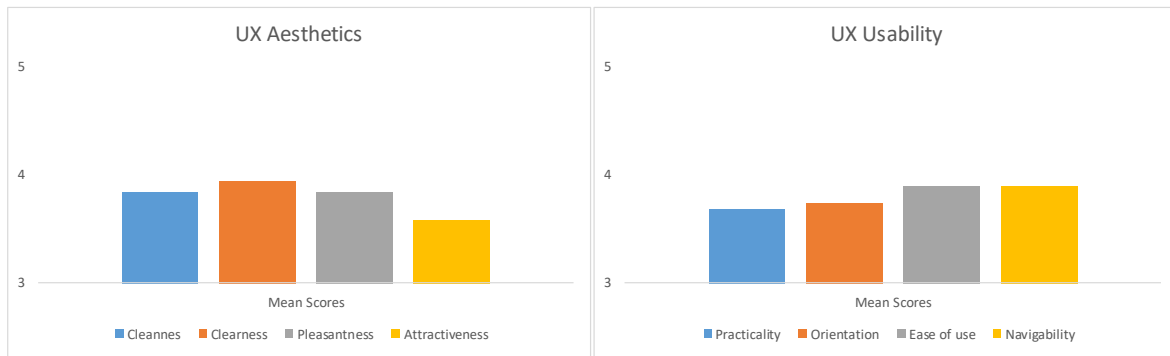
Figure 19. SMOOTH pilot – UX metrics for attractiveness and usability

Finally, regarding the results of the two multiple choice **questions regarding the market analysis** (see next figure), participants have a good general impression of the idea of having a tool to help them comply with the GDPR, and they would be happy to recommend it, although their willingness to pay for such a tool is somewhat low.

Of course, this is to be expected as they are carrying the first beta tests, and they have not been able to see the complete workflow of the platform, but we need to pay attention to this matter in the next pilot.
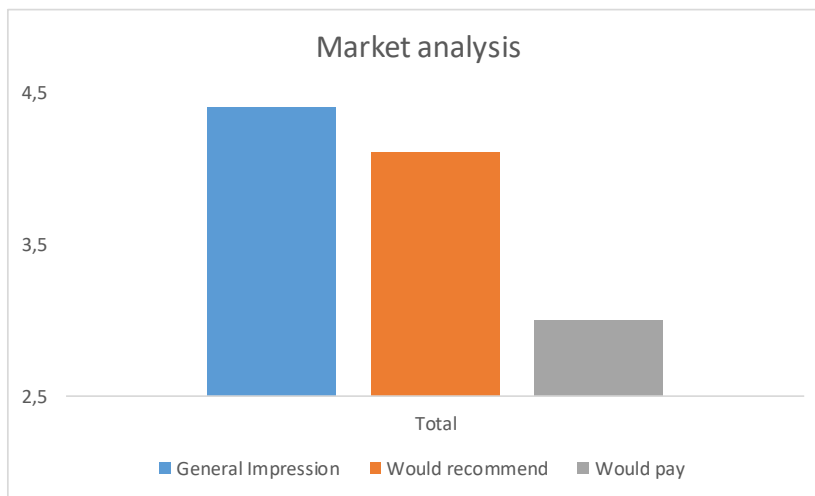
Figure 20. SMOOTH pilot – Market analysis metrics

3.2.2. Qualitative results from the UEES

Regarding the open questions in the UEES, the responses to the different EQ blocks and the market analysis are displayed in the following tables:

Problems understanding the questions	
Block	*Comment*
1	Problems to identify the name of the software used to control purchases
1	Was not clear enough this question: In which sector does your company operate? Because there is not one correct option.

1	Specify a bit more for data bases. Some tech business are not as easy to categorize as the question. Specify a bit more for data bases.
1	Not enough granularity in the business sector options. Not enough options on storage options available
1	It may be difficult for someone to know the specific database used to store personal information Checking documents and confirming the data details requested in our data bases
2	I've not enough information about the treatment of the data in general in my company.
2	13. Have you carried out a legitimate interest assessment before the start of the processing activities?
2	Technical stuffs
2	Question 3 ill posed.
2	q7 unnecessary
2	Question 9 options don't cover all the needed ones after the options in question 7.
2	I don't understand the answers of the question 3: 3. Where did your company get the personal data from? (it seems to me that they have to be different answers
2	A question asked me where I found the data, but the possible answers weren't consistent with the question
2	legal ground 9. Do you use pre-ticked boxes or any other form of pre-filled consent, or do (potential) customers give consent through an affirmative action (opt-in)?
2	Question one asks to upload files but it does not say what files need to be uploaded - very unclear Question 3 asks where the data is taken from, but it only contains types of data not sources of data as options - would need rephrasing
3	This wasn't clear: do you inform your (potential) customers about what exactly they are consenting to?
3	q7 unnecessary
3	In question 3 more than one option should be available to check. In question 6, 9 and 11 it refers to customers or clients instead of employees or job applicants.
3	question 12 and 13 were not clear
3	Unclear why I should upload a database of my employees/job applicants and whether that is legal at all!
4	I didn't know the definition legitimate interest assessment which appears in question 12, but the box which appears explains clearly the meaning.
4	Even if the block is about suppliers, there is a question concerning customers
5	uploading the file - had an error message: " file upload failed: You're not authorized to access this resource."
5	I have a blog, not a web. I don't know if it advises visitors for cookies, so the following questions weren't clear enough for me: from 3 to 8
5	We did our own webpage, so we don't have any idea about cookies or that kind of things
	"4. Does your company know what personal data it holds and does it have an appropriate data retention policy in place?" I don't' know the retention policy
7	concept of data minimisation Answers of question 4: The company knows what personal data it holds and processes, but it does not have a retention policy in place. The company knows what personal data it holds and has a data retention policy in place.
8	"storage devices encrypted" concept is not clear enough
8	I cannot control all the devices of my company and at least, i don't have enough information about them.
8	I didn't understand "log access", I assumed it referred to "log in"

8	Do you log access to your ICT environment and to personal data?
	I don't know if it is a personal question or for IT
9	Request for the right to erasure, including deletion of personal data from live and back-up systems.
	Request for the right to restrict processing
9	2. Is your company able to address data subject's requests (in principle) free of charge and within the one-month deadline provided in the GDPR (unless an extended deadline is justified)?
	I don´t know what a data subject´s request is
9	1. I don't truly know if I know any of these questionnaires.
	2. 3. I don't understand these questions
**Problems understanding the questions**
Block	*Comment*
1	Problems to identify the name of the software used to control purchases
1	Was not clear enough this question: In which sector does your company operate? Because there is not one correct option.
1	Specify a bit more for data bases.
	Some tech business are not as easy to categorize as the question.
	Specify a bit more for data bases.
1	Not enough granularity in the business sector options.
	Not enough options on storage options available
1	It may be difficult for someone to know the specific database used to store personal information
	Checking documents and confirming the data details requested in our data bases
2	I've not enough information about the treatment of the data in general in my company.
2	13. Have you carried out a legitimate interest assessment before the start of the processing activities?
2	Technical stuffs
2	Question 3 ill posed.
2	q7 unnecessary
2	Question 9 options don't cover all the needed ones after the options in question 7.
2	I don't understand the answers of the question 3: 3. Where did your company get the personal data from? (it seems to me that they have to be different answers
2	A question asked me where I found the data, but the possible answers weren't consistent with the question
2	legal ground
	9. Do you use pre-ticked boxes or any other form of pre-filled consent, or do (potential) customers give consent through an affirmative action (opt-in)?
2	Question one asks to upload files but it does not say what files need to be uploaded - very unclear
	Question 3 asks where the data is taken from, but it only contains types of data not sources of data as options - would need rephrasing
3	This wasn't clear: do you inform your (potential) customers about what exactly they are consenting to?
3	q7 unnecessary
3	In question 3 more than one option should be available to check.
	In question 6, 9 and 11 it refers to customers or clients instead of employees or job applicants.
3	question 12 and 13 were not clear
3	Unclear why I should upload a database of my employees/job applicants and whether that is legal at all!
4	I didn't know the definition legitimate interest assessment which appears in question 12, but the box which appears explains clearly the meaning.
4	Even if the block is about suppliers, there is a question concerning customers

5	uploading the file - had an error message: " file upload failed: You're not authorized to access this resource."
5	I have a blog, not a web. I don't know if it advises visitors for cookies, so the following questions weren't clear enough for me: from 3 to 8
5	We did our own webpage, so we don't have any idea about cookies or that kind of things
	"4. Does your company know what personal data it holds and does it have an appropriate data retention policy in place?" I don't' know the retention policy
7	concept of data minimisation Answers of question 4: The company knows what personal data it holds and processes, but it does not have a retention policy in place. The company knows what personal data it holds and has a data retention policy in place.
8	"storage devices encrypted" concept is not clear enough
8	I cannot control all the devices of my company and at least, i don't have enough information about them.
8	I didn't understand "log access", I assumed it referred to "log in"
8	Do you log access to your ICT environment and to personal data? I don't know if it is a personal question or for IT
9	Request for the right to erasure, including deletion of personal data from live and back-up systems. Request for the right to restrict processing
9	2. Is your company able to address data subject's requests (in principle) free of charge and within the one-month deadline provided in the GDPR (unless an extended deadline is justified)? I don´t know what a data subject´s request is
9	1. I don't truly know if I know any of these questionnaires. 2. 3. I don't understand these questions

Table 3. UEEs responses – Problems understanding the questions

Unknown vocabulary	
Block	*Comment*
1	specific meaning of micro-enterprise
1	"Commercial software" - I understand, but i don't know the exact meaning of the answer, in this case.
1	micro-enterprise
	concept of "legitimate interest assessment"
2	Is not just the vocabulary, is the real meaning of: data gathered via cookie identifiers + the broader stake that your company as a controller may have in the processing And in this case is just vocabulary: able to withdraw
2	pre-ticked boxes, affirmative action (opt-in), GDPR
3	Vocabulary, just like before: able to withdraw.
3	legitimate interest assessment concept
4	legitimate interest assessment
5	opt-out
7	I just checked the definition of "retention policy"
7	I usually confirm the information about a client or a supplier in the moment i need, to complete my job. I don't have a policy about confirming this information periodically.
8	term ICT was not clear enough
8	"1. Can every person who works in your company access most of the ICT environment?" I didn't know what ICT was
8	storage devices encrypted
8	ICT environment

8	ICT
9	"within the one-month deadline provided in the GDPR " I don't know exactly what it means

Table 4. UEEs responses – Unknown vocabulary

Other issues	
Block	*Comment*
1	I have no idea on databases names.
1	I think a lot of people or micro enterprises use google software for database, so i think it should be a possibility in the questionnaire
2	do you inform your (potential) customers about what exactly they are consenting to? - I think this is a problem, because we don't inform, just via mail.
2	I have no access, during this interview, to the database required in question 1
2	I don't have with me the consent form and the database
2	I need the information from my clients only to complete the legal part of my work. I don't use de data for anything else.
2	I think question 2 would be easier to complete if more background was given to the respondent about what information they are expected to input. Question 1 and 3 are very unclear as they stand was drawn to complete questions in this order 1, 3 and 2 - 2 seems to belong to another column, not necessarily the order I would read the questions!
3	Despite it is not mandatory, the request of the used databases is confusing.
3	to understand some concepts such as legitimate interest assessment
3	3.6, employees not customers
4	In question 4, in fact it happened in the previous block also, I found some confusing request: I tis asking only the usage for other interests, but it is not clear to me if it refers only to the answer of question 2 (other)
4	question 11 Do you have age-verification and parental-consent measures in place? makes no sense in suppliers block
4	My business doesn't have employers, we are 3 partners and we hire freelances if needed, so some questions are not relevant to me
5	uploading the file resulted in error message: "file upload failed: You're not authorized to access this resource."
5	I know nothing about the cookies policy in my "website" (blog)
5	If I miss the answer, i.e. by clicking on "mobile app" instead of "website", it is very difficult to have the right questions: I have to click on "neither" and then click again on "website". In the question number 2 if I click "+" to add another site, I realize only at the and that I didn't have to do it, it is not possible to come back, unless you go to the next block and then come back to the fifth.
8	only the 3 partners have access to all the computers and internet accounts with password
9	I don't really know the data's subject's rights
9	never thought about this: Data Subject's rights
9	notify when multiple options are allowed, squares circles not noticed

Table 5. UEEs responses – Other issues

Market Analysis
What limitations do you perceive, if any, in the SMOOTH platform? Are there any aspects you are not convinced about?
Can be a limitation of information that I have from my company, and from the cookies policy.
not enough knowledge about the topic

Order of the questions
Popularity and people actually getting to know about it
Some questions are not adequate for autonomous workers
I understand that the GDPR law is to be observed by every kind of company, but since there are so many sizes and sectors, one law fits all is a very complicated issue to address
At this moment I don't have specific issues regarding the platform, with the exception of the positioning of the question boxes. Maybe a link to the EU GDPR legislation and documents could be useful.
I think that the questionnaire is difficult to be answered by one employee, it has questions of different departments
The site is not safe: there isn't a SSL or TSL protocol which guarantees a safe connection. There is an Italian translation just for few questions and the user experience evaluation survey is available only in English. The visibility of a certain question is not always related to the previous question: i.e. in the second block if I select the oral consent option, I have to upload the document anyway. Moreover, if I answer "yes" to a question, realize that I gave the wrong answer and change it, the question related to the answer "yes" does not always disappear: I have to change block and then come back. In every block, disposition and enumeration of questions is not user friendly. Once the questionnaire is over, the next steps are not very clear: it is not well explained where and when I find the results. If I click on "row removal" the platform crashes. Finally I wonder how the edit of a submitted survey is managed when I change the answers at a later time. The quality of the questions is good, so in my opinion improving the user experience would be enough to create a better platform.
I guess it would be useful to have examples of good practice for GDPR compliance - what does compliant practice look like? The challenge will be that companies will have specific requirements and circumstances so the examples may not be 100% relevant to everyone, but some examples are better than no examples!
It was a bit long and poor of dynamism.
a bit chaotic, but 1st version is normal
had problem logging in due to wrong link sent as well as file upload capability was not function properly
More information about the SMOOTH products or other outcomes must be provided to answer properly all the questions in this last block
The experience was pleasant and no particular problem appears.
There are a lot of questions about GDPR that I don't know, and how to compliment.
it is easy to understand
I need to be able to provide feedback on questions even if I click 'No' to an answer (right now on this survey it makes me skip to the following block) I also need to be able to go back and edit my questions in case I make a mistake!

Table 6. UEEs responses – Market analysis

To finalise this section, and still regarding the market analysis, **no companies reported knowing of similar solutions for GDPR compliance**.

3.2.3. Completion times

A **time auditing tool was incorporated to the EQ** in order to track the timings of completion of the different blocks and questions. The tool was used for the first time in pilot 1, and it did not allow us to track the completion times by question, only by block, for blocks 2 to 9. Results of this analysis are preliminary; we will debug this issue so the tool can be fully exploited in pilot 2.

Average completion time for the whole EQ was 37.2 minutes, while average reading speed was 85 words per minute, well below the normative reading speed of 250 words per minute, which makes sense considering the complexity of the test.

Turning to the results per block (see next figure) participants took the longest time in block 2 (9.7mn), but almost half the time in blocks 3 and 4 which are very similar. A possible explanation is that block 2 is the first "hard" block of the EQ, and then blocks 3 and 4 have very similarly phrased and ordered questions. This is backed by the reading speeds which rise from 71 words per minute in block 2, to 142 words per minute in blocks 3 and 4. Block 6 is the fastest block, yet produces the slowest reading times. Finally, reading speeds area also noticeably low in blocks 5, 7 and 9.
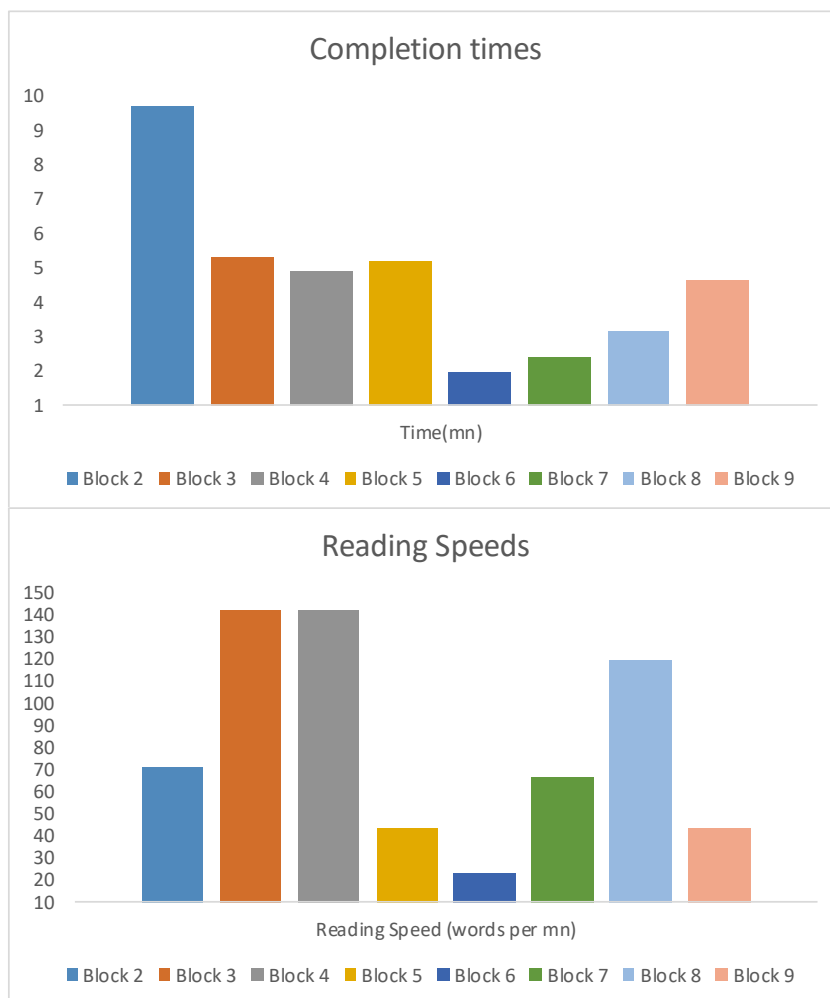
Figure 21. SMOOTH pilot – Completion times and reading speeds per EQ block

3.2.4. Informal reporting of technical difficulties

In addition to the qualitative feedback received through the User Experience Evaluation Survey, **some beta-testers reported their technical difficulties via webmail**.

Some of these bugs, resolved as the partners were made aware, were related to enabling a checkmark, the log in, issues when uploading / processing documents.

Hereunder are some screenshots captured by the testers when encountering these difficulties.
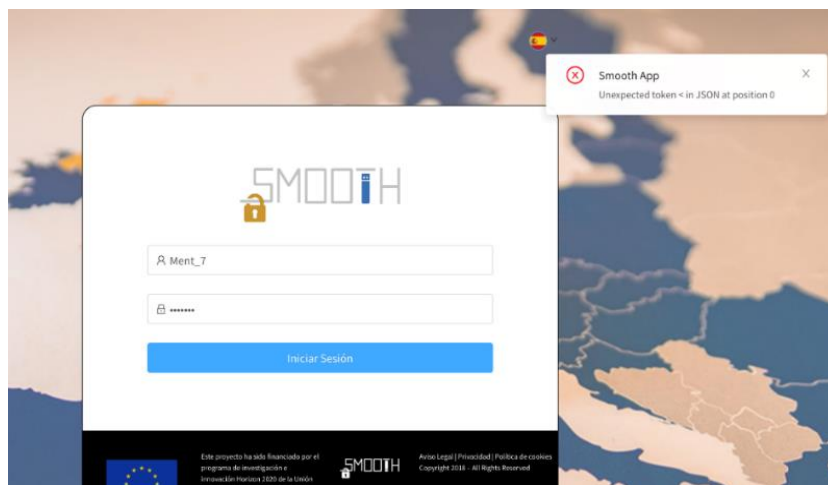
Figure 22. SMOOTH pilot – bug reported by tester related to log-in
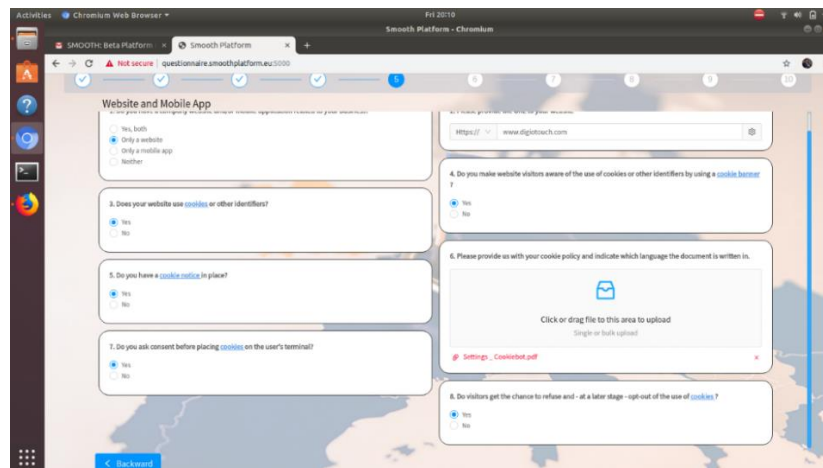
Figure 23. SMOOTH pilot – bug reported by tester related to "next button" not being available.

Figure 24. SMOOTH pilot – bugs reported by tester related to uploads

3.3.- Conclusions and plans for the improvement of the platform based on the feedback from users

The **main takeaways from this first pilot** regarding its effectiveness is that the **most important source of user feedback has come from the bugs detected** during the interactions with the system, **and from the qualitative and informal feedback** provided by the users.

In what pertains to the **quantitative results**, the low number of participants does not allow to compensate for individual variability in their responses, which means that we should be cautious on the conclusions we extract from them, whereas physiological data will be analyzed in the second pilot once a minimum of 20 participants in the lab are achieved. In the case of completion times, the time auditing tool will be debugged in order to obtain more precise results.

However, a look at all the results together paints a coherent picture where users mostly understand the general purpose of the questions posed to them, yet they sometimes fail to understand the vocabulary used or the relevance of the issues brought up to their business activity.

As shown by the responses to the multiple choice answers on the market analysis, they are fully **onboard with the idea of an automated assistance, but are not ready yet to pay for it**, which is understandable given that the platform is in its first stages of development, and that they have not seen the full workflow of the tool in place, resulting in the automated analysis and the compliance report. Also, in this sense, the analysis of UX metrics of usability and aesthetics goes hand in hand with the qualitative feedback in suggesting that **the tool can benefit from an improved UX design**. Before the second pilot, the interface will be analysed by an expert on UX design in order to make it more attractive, and especially more usable in terms of navigation and orientation during the questionnaire.

Turning now to the **qualitative data**, some participants expressed some doubts as to how to categorize their business activity, this is an issue that comes up frequently also in the informal feedback, for example, autonomous workers are particularly confused when it comes to categorizing their business activity and understanding the relevance of some of the requests to their business activity, while others stated that the information demanded from them is often distributed across different agents in their companies and not always easy to aggregate. Related to the latter, a common trend is the confusion on how to collect and communicate GDPR relevant

information from and to their customers, employees and providers, as is the case with consent forms, or privacy policies which practically no tested used.

Some users demanded more specificity in the requests concerning the use of databases and dedicated software, as well as on the requests to upload documentation, which they either did not have at hand, or was unavailable to them altogether. There often was a lack of understanding of technical terms such as "legitimate interest assessment", "legal ground" or "opt-in", or even "microenterprise" or "ICT". Another common source of confusion regarded the use of encryption or other cybersecurity measures.

Regarding legal concerns, some users expressed doubts about whether uploading some kind of information, like databases of their employees, was actually legal. Also, one of the users commented "The site is not safe: there isn't a SSL or TSL protocol which guarantees a safe connection".

Other debugging issues involved the uploading of documents, which has been fixed and further clarified.

Finally, and in line with the results of the UX usability metrics, many users expressed confusion towards the order in which the questions appeared on screen, and the fact that in some cases "the visibility of a certain question is not always related to the previous question…". Related to this, some users reported annoyance about being asked for a document after stating that they did not have it.

Regarding the **plans for the improvement of the platform**, it should be noted that since the first preliminary tests (made by the researchers themselves), informal feedback has been passed to the developing teams to allow progressive debugging of different issues as reported above. This process has continued during the pilots, with some of the issues detailed in this document already addressed shortly after being notified, For example: issues with the order of the questions, the logging into the platform, the uploading of documents, the misunderstanding of terms, etc

As already mentioned, an UX design specialist will review the platform so he can provide recommendations on a more attractive and easier to navigate interface layout. The feedback obtained from the UEES will be also delivered now to the development and legal teams, as described in section 2.4 so they can prioritize which changes are more important and feasible, in fact some of the qualitative feedback was relayed right after it was collected.

There were some cases of users that abandoned the survey shortly after beginning, and of those who finished, very few proceeded to the UEES (note that as said above most of the responses to the UEES came from either monitored or from laboratory sessions). It is expected that with a closer to final version of the platform, these challenges will be overcome, and data will be easier to collect. A larger number of participants will also allow us to carry a more nuanced and fine-grained analysis of the quantitative data, such as analyzing the results by sector, or by degree of literacy.

All in all, despite availing of a smaller quantity of feedback than expected, the **pilot has achieved is objective of providing initial feedback for the debugging and improvement of the user experience with the SMOOTH platform**.

4.- LESSONS LEARNT

- **Further testing should not be made in parallel with the delivery of major technical improvements**:
  During the beta-testing for this 1st version of the platform, the integration of the technical modules was planned to be implemented at the same time as the 1st pilot. In the end, the technical integration suffered a slight delay, causing the loss of the first users, which encountered too many difficulties for the use of the platform, dropping out of the pilot as a result.
  The partnership reacted to this difficulty, asking for a 1-month delay in the delivery of this D.7.2, extending the piloting period 1 month (November 2019), but still there was a reduction in the timings for the collection and analysis of data that, even though expectable in this stage of development, we should avoid in the next scheduled pilot.

- For the second pilot, we need to make an effort towards **better explaining the different modalities of participation** and in highlighting their relative benefits and gratifications, as well as on making sure that users understand the procedure to follow, especially when they select the option of carrying the testing on their own. The procedure is somewhat complex, and although this is to some extent unavoidable, we should try and make it easy for the companies. , In this sense, as explained above, we already introduced a farewell page at the end of the EQ with a further link to the UEES and the possibility of going back to their responses to the EQ.

- Considering the previous point, we will also implement a strong strategy and allocated resource to follow up with the companies who have demonstrated an interest in the project or who have signed up to participate. This will allow us to secure the companies and comfort them all along the process. Also, companies which seek for help want it right away – therefore a stronger follow up with the prospect will reinforce our presence and reassure the companies.

- Although we cannot make a tool tailored to each possible type of business activity, we should think about how to **make the tool friendlier** for as many cases as possible, as autonomous workers or, on the other extreme, companies that are big enough for the information needed to complete the EQ to be distributed between different agents.

- For the next phase of recruitment, we will **reach out to business support organisations**, Nesting programmes, Start-up hubs, co-working spaces etc. to increase the awareness of SMOOTH; and to convert awareness into users, we will use **testimonials** from MEnts that have successfully tested the platform; streamline communication outputs (using the strong visual identity we have) across all platforms; and increase SMOOTH presence at **external events** involving SMEs and Start-ups. By doing so we will work more to create additional partnerships.

ANNEX I – SMOOTH Partnership Agreement Template

Participation Agreement

SMOOTH

(Medium Sized Enterprises)

SUMMARY

Welcome to the SMOOTH project!

We are happy to have you on board as a participant to help us develop a solution that aims to facilitate small enterprises to become GDPR-compliant, but can also be used by SME's for the same purpose.

And while doing this, we will help you to become compliant.

This is your participation agreement in which essentially, the following agreements are made:

1. You participate in the SMOOTH project, a multinational research project co-funded by the EU.
2. In the SMOOTH-project we will develop (a.o.) a platform (the "**Platform**") that focusses on helping small enterprises, but also medium sized enterprises, to analyse the personal data they process (of their clients, suppliers, personnel, etc.) and verify whether these are processed in accordance with the GDPR. Furthermore, the Platform should also be able to automatically implement a number of GDPR requirements.
3. To develop the Platform, we need your help. More specifically, we need you to partially test the Platform and to provide us with your feedback.
4. During your participation in the project, we will support you to become GDPR-compliant by (a.o.):
   a. granting you a license to use the Platform for free during one year, once it is operational,
   b. providing you with some (generic) GDPR compliance guidelines,
   c. providing you with test reports on your GDPR-compliancy, obtained by running the platform on your data.

   However, please do take into account that the Platform is currently under development and that it remains your responsibility to be compliant with the GDPR (as described in Art. 15 of the Agreement).
5. The Platform is expected to be fully operation in 2020.

THIS AGREEMENT IS MADE BETWEEN:

(1)   *[Name PARTICIPANT] [Legal form],* with registered office at [*address]* and registered with the company registry under number [*number*], hereinafter referred to as the "**Participant**";

(2)   **FUNDACIO EURECAT**, with registered office at AVENIDA UNIVERSITAT AUTONOMA 23, 08290 CERDANYOLA DEL VALLES (BARCELONA), Spain and registered with the company registry under number ES G-66210345, hereinafter referred to as "**EURECAT**";

These parties are also jointly referred to as the "**Parties**" of each a "**Party**" and together.

BACKGROUND

A.   EURECAT is participating as project-partner in the EU H2020 funded "SMOOTH"-project (https://cordis.europa.eu/project/rcn/214847_en.html) (the "**Project**"). Eurecat is the coordinator / project manager of the project and participates to it as a "technology partner". The Project partners (see link above for the entire list) are organized in a consortium (the "**Consortium**") that will carry out and implement the Project.

B.   The Project aims to develop the SMOOTH-platform (the "**Platform**"). The Platform will assist micro-enterprises(i.e. Small and medium-sized enterprises (SME's) with 10 employees or less http://ec.europa.eu/growth/smes/business-friendly-environment/sme-definition_en), hereinafter referred to as the "Enterprises", to help comply with key requirements of the GDPR by designing and implementing an easy-to-use and affordable cloud-based platform service. By assisting these enterprises to adopt the GDPR, SMOOTH ultimately aims to protect micro-enterprises from the negative consequences of non-compliance, to safeguard citizens' rights to data protection and privacy and, by extension, benefit the European society. The Platform will also be useful (to a certain extent) for SME's, such as the Participant, who cannot be considered as micro-enterprises (hereinafter referred to as "**SME's**"), even though they are not the primary audience. The purpose of the Project is to develop the Platform.

C.   Within the scope of the Project, EURECAT needs the participation of EURECAT (non-micro) SME's to test the Platform. The participating Enterprises and SME's, such as the Participant, from their side can benefit from this participation by the support this provides to them (the "**Beta-Support**") for their own GDPR compliance.

D.   The Participant is a SME who accepts to participate to the Project in accordance with this agreement (the "**Agreement**").

E.   When reference is made to the "**Privacy Legislation**" in this Agreement, this means all relevant and applicable national and international data protection and privacy laws and regulations to which the Processing is subject. This definition includes, without limitation, the GDPR (Regulation (EU) 2016/679) and the E-Privacy Directive (2002/58/EC) or other framework that will replace any legislation act mentioned in this section.

NOW IT IS HEREBY AGREED as follows:

Terms that refer to terms used in the GDPR, e.g. 'data subject', 'controller', 'personal data', 'processing', 'processor', 'third country' etc., shall be construed in accordance with the meaning given to these in the GDPR, except if explicitly provided otherwise.**Subject of the Agreement**

1.1   This Agreement relates to:

a. the participation by the Participant to the Project, by testing the modules SMOOTEXT and SMONLINE described below

b. the provision of Beta-Support to the Participant by EURECAT.

2   The Project (SMOOTH) and the Platform

2.1   The Platform is composed of the following modules:

a. SMOODATA
SMOODATA automatically analyses the Enterprises' databases and discovers the data that an Enterprise has stored. Based on this data, it can be assessed if the Enterprise:

i   is only storing the personal data items in accordance with its policies or is storing personal data (by mistake) that it is not allowed to process.

ii   is applying the data minimisation principle (i.e., it is only storing the personal information required to run its business) and only that. To this end, the module uses as input the questionnaire provided by the Enterprise upon registration in the SMOOTH Platform.

iii   processes "Sensitive Personal Data" in the data repository.
The above analysis will be used by the Platform to report which data the Enterprise stores and whether the Enterprise:

1) has a legal basis for their personal data processing,
2) applies the data minimisation principle and,
3) stores sensitive personal data.

This module will not be tested by the Participant under this Agreement. It will be available for use by the Participant upon the official launch of the Platform, as described below under "Beta-Support".

b. SMOOTEXT
SMOOTEXT will analyse texts that are used by Enterprises to comply with Privacy Legislation, such as Privacy Policies or Cookie Policies and will have to be able to provide feedback about:

i   the presence of all required mentions in the policy,

ii   the readability, highlighting ambiguous or overly-complicated phrases,
and advise on required ameliorations.

The development of SMOOTEXT requires the development of algorithms and tools to process those textual documents, extracting key information and presenting it to the user for interpretation.

c. SMONLINE
SMONLINE analyses websites and mobile apps and will be composed of the following modules:

i   the SMONLINE website

ii   SMONLINE-advertising

iii   the SMONLINE-MobileApp

2.2   The participation by the Participant to the Project will be limited to the following phases of the Project (only the phases relevant for the Participant are mentioned) relate to:

Phase 2: Interactive testing and assessment pilots

In this phase the Project will evaluate the performance and usability of the modules SMOOTEXT and SMONLINE of the Platform through two interactive piloting activities. The first pilot will test an interim version of the Platform and the second pilot will test an almost final version of the Platform.

For the first pilot the Participant may be required to test an interim version of the Platform to evaluate the usability of the interfaces under a controlled environment. We will therefore combine common qualitative methodologies for usability testing such as semi-structured interviews and cognitive walkthroughs with physiological signals allowing the online tracking of attention and emotional processes while the Participant is interacting with the assessed technology. The Participant will also be required to provide some feedback through several questionnaires and interviews.

For the second pilot the Participant will be required to test an almost final version of the Platform and its modules with minimal support from EURECAT.

3   Responsibilities of EURECAT

3.1   EURECAT will:

a.   use the findings from the participation by the Participant to develop the Platform,

b.   provide the Beta-Support to the Participant.

4   The Beta-Support

4.1   EURECAT will provide the following Beta-Support to the Participant:

a.   A right to use the (final) Platform for free during 1 year upon the official launch of the Platform (at the then applicable general user terms and conditions). EURECAT will not be operating the Platform upon the official launch, so the Participant will be provided with this right by the Consortium partner(s) who will exploit the final Platform.

b.   (not applicable for participating SME's)

c.   EURECAT will provide to the Participant:

i   Guidelines drafted under the Project on how to take the first steps towards GDPR and ePrivacy-compliancy. These guidelines are drafted, designed and approved by the Consortium (including by the legal partners: KU Leuven, AEPD and DVI. See introduction of this Agreement for more information). They will be provided to EURECAT who will transfer these to the Participant.

ii When EURECAT starts testing the Platform (phase 2), the Participant will test the Platform, but without uploading any personal data, and will obtain upon such testing (and depending on the phase of development of the Platform):

- beta test reports, analysing the Participant's compliance with the Privacy Legislation and what needs to be implemented,

- automated test implementations of the GDPR requirements,

d. Access to the SMOOTH GDPR Handbook (SMOOK) (available to the public and to the Participant in 2020)

5 **(Article not applicable for participating SME's)**

6 **Article not applicable for participating SME's**

7 **Responsibilities of the Participant**

7.1 The Participant will:

a. **participate in good faith** to the Project, in accordance with this Agreement.

8 **Mutual responsibilities**

8.1 When processing personal data under this Agreement, each Party warrants that:

a. it has all necessary rights, permissions and/or licenses to process such personal data as a controller under this Agreement; and

b. it will comply with any requirements arising under Privacy Legislation to protect any personal data it processes under this Agreement.

9 **Liability and indemnification**

9.1 (not applicable for participating SME's)

9.2 In respect of any information, materials (including the Platform) or Services supplied by one Party to another under this Agreement, no warranty or representation of any kind is made, given or implied as to the sufficiency or fitness for purpose nor as to the absence of any infringement of any proprietary rights of third parties.

9.3 No Party shall be responsible to any other Party for any indirect or consequential loss or similar damage such as, but not limited to, loss of profit, loss of revenue or loss of contracts, provided such damage was not caused by a wilful act or by a breach of confidentiality or by the gross negligence

9.4 (not applicable for participating SME's)

9.5 Each Party will indemnify and hold harmless the other Party in respect of all and any claims, proceedings or actions brought against the other Party arising out of any breach by the first Party of the warranties and undertakings in this Agreement.

10   Duration

10.1   This Agreement shall commence upon signature of all Parties and remain in force until three (3) years after the end date of the SMOOTH Project (hereafter, the "Term"). A Party can terminate the Agreement by providing one month's written notice of termination (by e-mail with confirmation of receipt) to the other Parties.

   If the Participant terminates the Agreement, EURECAT is allowed to continue to use the results obtained from the participation by the Participant, to further evaluate the Project.

11   Intellectual Property

11.1   EURECAT is the (co-)owner and/or licensee of the intellectual property rights (including, without limitation, any patent rights, model and design rights, topography rights, trademark rights, and/or any applications for such rights, copyrights, neighbouring rights, portrait rights, database rights, trade names and know how, as well as any similar rights hereafter "Intellectual Property Rights") in the Project, the outcome thereof, the Platform, any developments made under this Agreement, documentation delivered and work carried out under this Agreement, unless explicitly agreed otherwise in writing.

11.2   The Participant shall refrain from infringing EURECAT's Intellectual Property Rights and shall defend and indemnify EURECAT from and against any claim resulting from an infringement of these Intellectual Property Rights by the Participant.

11.3   The Participant shall not remove or alter any marking in relation to Intellectual Property Rights of EURECAT.

11.4   The Participant shall not, at any time, claim any right to, title or interest in EURECAT's Intellectual Property Rights, by registration or otherwise, other than the right to use the same under the terms and conditions hereof and exclusively for the purpose of complying with its obligations or executing his rights under this Agreement.

11.5   The Participant shall not attempt to reverse engineer the Platform or any part thereof, unless and to the extent permitted by the applicable laws.

12   Software

12.1   The Platform functions through and in combination with the use of software necessary for its operation and good functioning. The Platform, or specific parts of it, may be installed on one or more internal and/or external processing units or computer systems of the Participant or may be made accessible via web applications.

12.2   The Platform is owned by EURECAT or third parties (which have duly licensed it to EURECAT) and may be part of EURECAT's Intellectual Property. A personal, non-exclusive and non-transferable license to use the Platform is granted to the Participant, as end user, to use this Platform solely for the purposes as described under this Agreement.

12.3   Unless if and to the extent permitted by applicable mandatory copyright laws, the Participant will not duplicate, decompile, reproduce or modify the Platform or its form, or create derivative works from or otherwise modify the Platform, other than as is required for the normal use of the Beta Services.

12.4   The Platform uses intelligent machine learning / deep learning software that is continuously trained by analysing data to improve its analytical and recognition skills.

12.5   Notwithstanding any other agreement on this subject, the Platform is exclusive EURECAT's Intellectual Property, including any experience, improvements and evolutions in the functioning of the Platform through the deep learning process, regardless of which and whose data was used to train the Platform. This does not affect the Participant's Intellectual Property Rights on the material that such Participant examines with the Platform, nor on the outcome of such examination or research.

13   Confidentiality

13.1   Parties undertake, both during the term of this Agreement as well as after its termination, not to:
   a.   use, disclose, distribute, publish or otherwise communicate to third parties Confidential Information which has been obtained in the execution of this Agreement, unless:
      i   explicitly allowed by the Party who the information relates to.
      ii   allowed under this Agreement and/or Grant agreement and/or EU and national law.
      iii   disclosed to the extent required by a mandatory regulatory requirement or by a competent authority.
      iv   disclosed to a Party's professional advisers under conditions of confidentiality and only to the extent necessary for the implementation of this Agreement or for the normal functioning of its business.
      v   disclosed to the extent that such information is generally known, other than as a result of the wrongful publication thereof by any person.
      vi   disclosed to the extent and insofar Parties use Confidential Information to protect their rights with respect to each other.
   b.   to copy or reproduce in any form or on any carrier or medium (or allow third parties such copying or reproduction) paper or electronic media containing Confidential Information or refer thereto, without the prior written consent of the relevant Party.

13.2   "**Confidential Information**" for the purposes of this article means: any confidential or other non-public information which cannot be reasonably expected to be non-confidential regarding the other Party, its activities, methods, customers, employees, investments, projects or results, or relating to any of the other Party's affiliated company, including (without limitation) any lists of customers and prospects, marketing plans and marketing strategies, financial reports and forecasts, and any other non-public information. If doubts exist as to whether certain information is confidential or not, the receiving Party should verify this with the disclosing Party and should treat this in the meanwhile as confidential. For the avoidance of doubt: all exchanged personal data is to be considered as Confidential Information.

14   Independent parties

14.1   There is no link of subordination nor any form of joint-venture between the Participant and EURECAT, which are and remain completely independent of each other and are not entitled to represent one-another in any way.

14.2   Each Party must ensure compliance of its own obligations under this Agreement with its legal obligations.

15   Disclaimer

15.1   The Participant is aware that the Platform is under development and that the Participant will be beta-testing it. This means that no guarantees are given with regards to the functioning, quality or availability of the Platform and that only the Participant remains responsible to assure that he complies with the Privacy Legislation.

15.2   The Participant who qualifies as an SME is aware that the Enterprises are the target audience of the Platform. It is aware that the results and advices provided to them may not be entirely tailored to or adequate for their needs.

16   Governing Law

16.1   This Agreement will be governed by and construed in accordance with the laws of Spain and will be subject to the exclusive jurisdiction of Spain, except to the extent that applicable Privacy Legislation requires otherwise, in which event this Agreement will be governed in accordance with applicable Privacy Legislation and be subject to the jurisdiction of the relevant controller.

17   Miscellaneous

17.1   Schedules to this Agreement will be deemed to be an integral part of this Agreement to the same extent as if they had been set out in full within this Agreement.

17.2   This Agreement, including the attached Schedules constitute the entire agreement between the Parties relating to the subject matter of this Agreement and supersede all prior agreements, understandings, negotiations and discussions of the Parties.

17.3   The provisions of this Agreement are severable. If any phrase, clause or provision is invalid or unenforceable in whole or in part, such invalidity or unenforceability will affect only such phrase, clause or provision, and the rest of this Agreement will remain in full force and effect.

17.4   Any notice, letter or other communication contemplated by this Agreement will be communicated in writing via letter to the addresses set out in the relevant Schedule or by email to email addresses agreed between the Parties.

17.5   The provisions of this Agreement will endure to the benefit of and will be binding upon the Parties and their respective successors and assigns.

17.6   This Agreement may be executed in counterparts, each of which will be deemed an original, but all of which together will constitute one and the same instrument.

17.7   This Agreement has been signed on behalf of each of the Parties by a duly authorised signatory.

Signed for and on behalf of EURECAT   Signed for and on behalf of the Participant

_____   _____

Name: Name:

Position: Position:

ANNEX II – DIHs contacted for recruitment purposes

DIH NAME	COUNTRY
Aachen DIH Center for Robotics in Healthcare	DE
Aarhus University Centre for Digitalisation, Big Data and Data Analytics (DIGIT)	DK
AddedValue	HU
Advanced Manufacturing Digital Innovation Hub	LT
AFIL - Lombardy Intelligent Factory Association	IT
Agri Sud Ouest Innovation	FR
Agro Space DIH	LT
AIR4S - Artificial Intelligence & Robotics for Sustainable Development Goals	ES
Algebra LAB	HR
am-LAB	HU
AMSYSTEMS Center	NL
Application Center for Automation in Healthcare	DE
Arctic Drone Labs	FI
AREA Science Park - IP4FVG	IT
ASTER-DIH	IT
ATHENA Research and Innovation Center	EL
Atlanpole	FR
Attica Hub for the Economy of Data and Devices- ahedd	EL
AURIA CLINICAL INFORMATICS (ACI)	FI
Baltic Maritime Digital Innovation Hub	LT
Barça Innovation Hub (BIHUB)	ES
Barcelona Activa SA SPM	ES
Basque Digital Innovation Hub (BDIH)	
BIBA- Bremer Institut für Produktion und Logistik GmbH	DE
BIC EURONOVA S.A.	ES

DIH NAME	COUNTRY
Bioindustry Park Silvano Fumero SpA - bioPmed innovation cluster	IT
BioNanoNet ForschungsGmbH, BNN	AT
Biorizon	NL
BME-EET	HU
BOOST Smart Industry Hub, East-Netherlands	NL
BrainsBusiness ICT North Denmark	DK
Brightlands Materials Center	NL
Bristol Robotics Laboratory's RIF	UK
Campania Digital Innovation Hub	IT
CAMPUS 02 R&D Section	AT
Canary Island Digital Innovation Hub (CIDIHub)	ES
Cap Digital	FR
Center Digitisation.Bavaria, ZD.B	DE
Centre de recherche en aéronautique ASBL, Cenaero	BE
Centre d'Innovació i Tecnologia de la UPC (CIT UPC)	ES
Centre for Advanced Manufacturing Technologies, Wroclaw University of Science and Technology	PL
Centre for Applied Data Analytics and Machine Intelligence, CeADAR	IE
CENTRE FOR RESEARCH AND TECHNOLOGY HELLAS	EL
Centre Val de Loire Digital Innovation Hub	FR
Centro Nacional de Tecnología de Riegos (CENTER)	ES
Cineca Consorzio Interuniversitario	IT
CITC-EuraRFID	FR
Competence Centre Mittelstand 4.0 Berlin	DE
CP Lab Newcastle	UK
CPI	UK
Cranfield University Digital Innovation Hub	UK

DIH NAME	COUNTRY
CROBOHUB Croatian Robotics Digital Innovation Hub	HR
CYBERSEC HUB	PL
CybersecRDI: Cybersecurity Research, Development and Innovation Hub	HR
Cybersecurity Innovation HUB	ES
Cybersecurity innovation hub (DIH – CZ)	CZ
Cyprus Digital Innovation Hub	CY
Czech Institute of Informatics, Robotics, and Cybernetics	CZ
Danish Technological Institute, Robot Technology	DK
Data Science and Computational Intelligence Innovation Hub (DaSCII Hub)	ES
Demola-Budapest	HU
DFKI Human Centric AI Innovation Hub	DE
DIEX - Digital Experience	IT
DIGIHALL	FR
Dig-I-Hub Kecskemét	HU
DIGIMAT: South Moravian Digital Manufacturing Hub	CZ
DIGIPARC - Digital Partnership Centre	HR
Digital Catapult	UK
Digital Hub Logistics	DE
Digital Innovation Hub Andalucía Agrotech	ES
Digital Innovation Hub Basilicata	IT
DIGITAL INNOVATION HUB BELLUNO DOLOMITI	IT
Digital Innovation Hub for Smart Manufacturing	SI
Digital Innovation Hub Liguria	IT
Digital Innovation Hub Lombardia	IT
Digital Innovation Hub of Eastern Slovenia (DIGITECH SI -East)	SI
Digital Innovation Hub Piemonte	IT

DIH NAME	COUNTRY
Digital Innovation Hub Slovenia	SI
Digital Innovation Hub 'Smart Production Systems Saxony' – InnoSax	DE
DIH AGRIFOOD - Digital Innovation Hub for Agriculture and Food production	SI
DIH- Confartigianato Ancona - Pesaro e Urbino	IT
DIH Marche - 4M.0	IT
DIH Tartu	EE
DIHNAMIC - Digital Innovation Hub for Nouvelle-Aquitaine Manufacturing Industry Community	FR
DIHV	IT
Dinapsis DIH	ES
EDI DIH	LV
Eliko	EE
Embedded System Design & Application Laboratory	EL
EOSC-DIH	NL
EPCC	UK
E-Secure Transactions Cluster - TES	FR
espaitec Science and Technology Park	ES
ETICOM, Digital economy cluster in Andalusia	ES
European Digital Innovation Hub The Northern Netherlands / Region of Smart Factories	NL
Faubourg Numérique	FR
Finnish Center for Artificial Intelligence (FCAI)	FI
Flam3D	BE
Flanders' FOOD, FF	BE
Flanders Make	BE
Foundation for Research and Technology – Hellas (FORTH) / PRAXI Network	EL
Fraunhofer Future Work Lab (FWL)	DE
Fraunhofer IPA - Robot and Assistive Systems	DE

DIH NAME	COUNTRY
Future Cities Catapult	UK
FZI Research Center for Information Technology	DE
GALician manufACTuring Innovation ConsortiA (GALACTICA)	ES
Granada Health Technology Park	ES
Granada Plaza Tecnológica y Biotecnológica	ES
Hahn-Schickard Gesellschaft für Angewandte Forschung e.V. (Hahn-Schickard)	DE
HPC-Cloud and Cognitive Systems for Smart Manufacturing processes, Robotics and Logistics.	ES
HPC4Poland	PL
HPC5 - High Performance and Cloud Computing Cross-border Competence Consortium	SI
HUB for Agriculture (HUB4AGRI)	PT
Hub 4.0 of Manufacturing Sectors in Valencian Region	ES
hub.in Bjelovar	HR
ICT4Manuf	FR
Images et Réseaux	FR
iMan Norte Hub - Digital Innovation Hub for Customer-Driven Manufacturing @ Norte	PT
IMEC	BE
Industrial Reality Hub	NL
Industrial Ring	ES
Industrial Technology Knowledge Linares DIH	ES
Infrastructure and Cloud data centre test Environment (SICS ICE)	SE
innomine Digital Innovation Hub	HU
Innovalia ZDM Digital Innovation Hub	ES
Innovation Center for Artificial Intelligence	NL
INNOVATION CENTER OF MODERN INDUSTRY IN BRANDENBURG GERMANY	DE
innovation experience HUB (InnexHUB)	IT
Innovation for Manufacturing in the South (I4MSOUTH)	ES

DIH NAME	COUNTRY
Insight Centre for Data Analytics	IE
Insomnia Digital Innovation Hub	
Institute of Electron Technology (ITE)	PL
Institute of Production Management, Technology and Machine Tools (PTW)	DE
Institute of Reliable Embedded Systems and Communication Electronics	DE
Intelligent Industry ecosystem	FI
International Advanced Manufacturing 3D Hub (IAM 3D HUB)	ES
Internet of Things, Intelligent Systems, Data Engineering and Media DIH [National Technical University of Athens - Institute of Communication and Computer Systems]	EL
IoT Catalan Alliance	ES
IoT DIH	ES
IoT-SmartSantander DIH	ES
Irish Centre for Cloud Computing and Commerce (IC4)	IE
Irish Manufacturing Research	IE
ITI Data Hub (The Data Cycle Hub)	ES
IT4Innovations National Supercomputing Center	CZ
i4CAM HUB (Innovation for competitiveness and advanced manufacturing)	ES
JESSICA FRANCE - CAP'TRONIC program	FR
Jheronimus Academy of Data Science	NL
Jožef Stefan Institute	SI
Know-Center GmbH	AT
La Salle Technova Barcelona	ES
Laser Digital Innovation Hub (LaserLT DIH)	LT
Latvian IT Cluster	LV
Lithuanian robotic DIH (LTroboticsDIH)	LT
Luxembourg Institute of Science and Technology (LIST)	LU
L3S Digital Innovation Hub	DE

DIH NAME	COUNTRY
MADE - Manufacturing Academy of Denmark	DK
Made Different | Digital Wallonia	BE
Manufacturing Technology Centre	UK
MEDISDIH - Apulian Mechatronics Technological Cluster and Digital Innovation Hub	IT
Minalogic	FR
minaSmart	FR
Mittelstand 4.0 Competence Centre Ilmenau	DE
Mittelstand 4.0-Kompetenzzentrum Darmstadt	DE
Mobile Heights / Skåne EDIH	SE
Mov'eo	FR
Munich Innovation Hub for Applied AI	DE
Nanotechnology Lab LTFN (Lab for Thin Films - Nanobiomaterials - Nanosystems - Nanometrology)	EL
NASK National Research Institute	PL
National Digital Contents Hub, POLO	ES
National Documentation Centre / National Hellenic Research Foundation	EL
NAVARDMIHub: Navarra Region Digital Manufacturing Innovation HUB	ES
Novel-T	NL
nZEB Smart House	EL
One Sea - Autonomous Maritime Ecosystem	FI
OuluHealth	FI
Parque Tecnológico de Andalucía (PTA)	ES
PARSEC HUB ANCONA	IT
PhotonDelta	NL
Photonics Bretagne	FR
PIAP HUB	PL
Plastipolis	FR

DIH NAME	COUNTRY
Pôle EMC2 Competitiveness cluster for innovation in production technologies	FR
Politecnico di Milano	IT
PrintoCent	FI
PRODUTECH Digital Innovation Hub National Platform	PT
RECENDT - Research Center for Non-Destructive Testing GmbH	AT
Regional Platform Industry 4.0 of Tuscany Region (Tuscan Platform Industry 4.0)	IT
Research Center for Informatics	CZ
Réseau LIEU – LIaisons Entreprises-Universités	BE
RIF BioRobotics Institute	IT
RIOHUB	ES
ROBOCOAST	FI
Robotics Digital Innovation Hub	ES
RoboValley Delft	NL
Secured Communicating Solutions cluster	FR
Sibiu Smart Systems	RO
Siegener Mittelstandsinstitut (SMI)	DE
Sirris Hub / Data and software Innovation	BE
Sirris Hub Mechatronics and Digitising Manufacturing	BE
Sirris Hub Smart Assembly	BE
Sirris Hub/smart product	BE
Smart Connected Supplier Network	NL
Smart Data Solution Center Baden-Württemberg	DE
Smart Digital Farming	BE
Smart Industry Centre (SmartIC)	EE
Smart Infrastructure Hub Leipzig	DE
Smart Manufacturing	FI

DIH NAME	COUNTRY
Smart Systems Hub - Enabling IoT	DE
Smart Welding Factory (SWF)	NL
SmartCityTech	ES
SMILE-DIH (Smart Manufacturing Innovation for Lean Excellence center - Digital Innovation Hub)	IT
Space53	NL
SpectroNet - International Collaboration Cluster	DE
SPEEDHUB	IT
Stena Industry Innovation Hub at Chalmers - SII-Hub	SE
Styrian Technology Park, STP	SI
Sunderland Software City	UK
Sunrise Valley Digital Innovation Hub (SV DIH)	LT
Super IoT	FI
SynHERA	BE
Systematic Paris Region	FR
Tallinn Science Park Tehnopol	EE
TechMed Innovation Hub	NL
TECHNOLOGICKÉ CENTRUM Hradec Králové	CZ
Technologie-Initiative SmartFactory KL e.V.	DE
Technologies Added	NL
Technologies for Efficiency Digital Innovation Hub Extremadura	ES
Technology Transfer via Multinational Application Experiments (TETRAMAX)	DE
TECNOCAMPUS TECHNOLOGY PARK	ES
TeraLab : Big Data Platform for Research , Education and Innovation	FR
The Alexandra Institute - ICT-based innovation	olm@alexandra.dk
The AMRC's Factory 2050	UK
The High Value Manufacturing Catapult	UK

DIH NAME	COUNTRY
The KTH Innovation Hub of Digital Industrialization	SE
ThermoPlastic composites NL	NL
TNO Holst Centre	NL
Tyndall National Institute, Tyndall	IE
t2i - DIH Triveneto	IT
Umbria Digital Innovation Hub	IT
Urban ICT Arena	SE
VDTC of the Fraunhofer IFF	DE
Ventspils High Technology Park (VHTP)	LV
ViaMéca	FR
Virtual Vehicle Research Center	AT
Vitus Bering Innovation Park	DK
VP Delta	NL
3IF - Industrial Internet In Flanders	BE
5G Test Network Finland (5GTNF)	FI
5GBarcelona	ES
5TONIC Open 5G Lab 5TONIC	ES
7TB - 7 Technopoles de Bretagne	FR