



**SMEDATA**

# DELIVERABLE

Project Acronym: **SMEDATA**

Grant Agreement number: **814763**

Project Title: **Ensuring the Highest Degree of Privacy and Personal Data Protection through Innovative Tools for SMEs and Citizens**

## D5.2 Plan for Dissemination and Communication

|  |  |   |
|--|--|---|
| Project co-funded by the European Commission within <b>REC-AG-2017</b> |  |   |
| Dissemination Level  |  |   |
| PU   | Public   |   |
| CO   | Confidential, only for members of the consortium (including the Commission Services) | X |



## Revision History, Status, Abstract, Keywords, Disclaimer

### Revision History

| Revision | Date       | Author              | Organisation | Description   |
|----------|------------|---------------------|--------------|---|
| 0.1      | 14.12.2018 | Francesco Laviola   | UNIROMA3     | First draft   |
| 0.2      | 16.12.2018 | Hristo Alaminov     | CPDP         | Review, design, additional chapters and Action plan |
| 0.3      | 18.12.2018 | Tonita Vakarelova   | EY           | Review  |
| 0.4      | 19.12.2018 | Hristo Konstantinov | APIS         | Review  |
| 0.5      | 19.12.2018 | Hristo Alaminov     | CPDP         | Review  |

|                  |   |            |         |            |
|------------------|---|------------|---------|------------|
| Date of delivery | Contractual:  | 31.12.2018 | Actual: | 28.12.2018 |
| Status           | final <input checked="" type="checkbox"/> /draft <input type="checkbox"/> |            |         |            |

2

|                                 |  |
|---------------------------------|--|
| Abstract<br>(for dissemination) | Plan for dissemination and communication aims at ensuring consistent approach for planning and using all possible SMEDATA project communication channels as well as dissemination of project deliverables. Among envisaged communication activities are web presence, public events, and publications: leaflet, newsletter, press releases, journalistic articles, special issues of the ‘Legal Tribune’ magazine. |
| Keywords                        | Dissemination, communication, publication, workshop, conference, round table discussion, target audience, website, social networks   |



# Table of Contents

|  |           |
|--|-----------|
| <b>List of abbreviation</b> .....  | <b>4</b>  |
| <b>Introduction to the Plan for dissemination and communications</b> ..... | <b>5</b>  |
| <b>Communication goals</b> .....   | <b>6</b>  |
| <b>Target groups</b> .....   | <b>7</b>  |
| <b>Dissemination and Communication Strategy</b> .....                      | <b>8</b>  |
| <b>Communication messages and tools</b> .....                              | <b>10</b> |
| <b>Acknowledging EU funding</b> .....                                      | <b>11</b> |
| <b>Implementation Plan</b> .....   | <b>11</b> |
| <b>Updating of the Plan</b> .....  | <b>14</b> |
| <b>Action plan</b> .....   | <b>15</b> |

## Disclaimer

The content of current Plan for dissemination and communication represents the views of the author only and is their sole responsibility. The European Commission does not accept any responsibility for use that may be made of the information it contains.



# List of abbreviation

|                  |   |
|------------------|---|
| <b>CPDP</b>      | Commission for Personal Data Protection<br>(Комисия за защита на личните данни) |
| <b>APIS</b>      | APIS Europa   |
| <b>SAJUZ</b>     | The Union of Bulgarian Jurists<br>(Съюз на юристите в България)                 |
| <b>EY</b>        | Ernst & Young Law Partnership<br>(Адвокатско съдружие Ърнст и Янг)              |
| <b>EWLA - BG</b> | European Women Lawyers Association Bulgaria                                     |
| <b>GPDPIT</b>    | Garante per la Protezione dei Dati Personali                                    |
| <b>UNIROMA3</b>  | Università degli Studi Roma Tre   |
| <b>GDPR</b>      | General Data Protection Regulation  |
| <b>EU</b>        | European Union  |
| <b>EC</b>        | European Commission   |
| <b>REC</b>       | ‘Rights, Equality, Citizenship’ programme                                       |
| <b>WP</b>        | Work Package(s)   |
| <b>SME</b>       | Small and medium-sized enterprises  |



# Introduction to the Plan for dissemination and communications

The SMEDATA project was developed by the Consortium members (CPDP, APIS, SAJUZ, EY, EWLA – BG, GPDPIT and UNIROMA3). The project will promote the preparation for the effective application of the General Data Protection Regulation (GDPR) through awareness, multiplying training and sustainable capacity building for SMEs and their associations, including their legal advisors. The project aims at ensuring sector specific and sustainable knowledge and implementation of GDPR through self-assessment and awareness tool and assisting the understanding and compliance with GDPR.

This Plan for dissemination and communications aims to promote the comprehensive reform of EU data protection rules under the new GDPR and the benefits it will bring to citizens and business in Bulgaria and Italy as a key enabler of the Digital Single Market. The Plan defines communication goals and target groups in order to enable Consortium members to achieve its overall organizational objectives by active interaction with all parties concerned as well as to define the expected outcomes for the coming period with planned communication tools.

This Plan also includes 23 months Action Plan for the period since January 2019 to November 2020.

When designing planned activities and messages aimed to address target audiences, the team working on preparation of this Plan was building upon the information of all achievements of the Consortium members to date, findings of conducted analysis of communication needs of the target audiences and certainly the characteristics of every target audience, particularly from the perspective of selection of appropriate strategic tactics and tools.

The Plan for promotion was prepared by a team of representatives (working group) of the Consortium members (CPDP, APIS, SAJUZ, EY, EWLA – BG, GPDPIT and UNIROMA3).



# Communication goals

One of the main points of current Plan involves the development the communication, also by making use of the establishment of an appropriate web and social media presence. It will help to ensure adequate promotion of the awareness basically in the Republic of Italy and Republic of Bulgaria. In doing so, these goals have been oriented towards specific audiences: SMEs representatives and legal professionals.

The communication goals envisioned to foster the specific strategic orientations of the Consortium members are focused on:

1. Assisting the understanding and compliance with GDPR through the development of an innovative software tool for individuals and SMEs Activities (Work Packages);
2. Awareness and Training;
3. Self-assessment tool for sustainable awareness based on SMEs' specific needs and processes from the prospective of personal data protection;
4. Development of Mobile Application for Citizens and SMEs;
5. Dissemination and Communication.



# Target groups

The project is aimed at two main target groups – representatives of micro, small and medium-sized enterprises (SMEs) and SMEs associations, and legal professionals within SMEs, as well as a subsidiary one – citizens in their role as data subjects. The definition of the first target group is based on analysis and researches indicating that SMEs have neither contingency reserve, nor prepared work force for dealing with such enormous change as applying of new EU data protection rules is. Concurrently, SMEs play a profound role in the economic development in all EU Member States. The greatest number of workers is employees of the SME entities.

The main subgroup of the SMEs target group are legal professionals dealing with data protection issues in the context of SMEs, for example in the area of contract law, company law and administrative law. The representatives of this group play the key role of translating legal requirements into legitimate practical measures and procedures aimed at achieving compliance with the new regulatory framework. Their various kinds of activities create the necessary environment for the lawful implementation of GDPR provisions. Collaboration between them and the national data authorities is of a great importance for ensuring compliance with the GDPR requirements. In addition, most of the legal practitioners are more or less representatives of the biggest group of legal entities, namely small and medium enterprises.

Since the primary objective of GDPR is to give individuals back control of their personal data, citizens are also targeted by the project. The proposed project activities are placing particular emphasis on ensuring that citizens are aware of and have acquired sufficient knowledge how to exercise effectively their rights as data subjects.



# Dissemination and Communication Strategy

The main objective of the SMEDATA project dissemination strategy is to achieve sustainable and consistent SMEDATA presentation and explanation of project deliverables among target groups of the project.

Specific objectives of the SMEDATA project dissemination strategy are:

- Proposal for contemporary communication mix for dissemination of the project objectives, WP, deliverables as well as expected results;
- Proposal for coherent approach for defining and implementing the most suitable dissemination methods for SMEDATA project;
- Further engagement of SMEDATA stakeholders

## Philosophy

Conducting a largely deployed dissemination and communication campaign is of key importance for the success of the project and the sustainability of its results. As SMEDATA dissemination strategy aims at promoting the benefits that the new data protection regulatory framework brings to business and citizens by popularising and communicating the main project outputs to the target audience. Based on this, the project dissemination and communication activities pursue the following specific objectives:

- To ensure that the results of this project are exploited to the full both during and after completion of the project and, to this end, it is vital that a clear post-project follow-up strategy is devised so that target groups are not left 'high and dry' after the date the project officially ends.
- To disseminate information about the project itself, as well as its results, to representatives of the target groups and other interested stakeholders from across the European Union, and to ensure that the results of this project are of benefit to actors outside the network.





SMEDATA consortium considers dissemination and communication as a ways for:

- Common understanding – for project objectives, WP, deliverables as well as expected results by SMEDATA stakeholders;
- Awareness raising of project target groups;
- Calling for action – from project consortium partners as well as project stakeholders.

Triple W:

**Who are SMEDATA target groups?**

- Key representatives of SMEs and their associations, including high-level SME staff, owners, and managers;
- Legal representatives and legal advisers who can demonstrate close and stable relationship with SMEs, such as long-term contracts/agreements or appointed for Data Protection Officers under GDPR for SMEs and their associations;
- General public.

**What does SMEDATA team disseminate?**

- Project deliverables;
- REC programme key messages;
- EU key messages;
- SMEDATA key messages.

**When does SMEDATA team communicate?**

- Before SMEDATA project implementation;
- During project implementation;
- After SMEDATA project completion.

SMEDATA key messages:

The key messages of the SMEDATA dissemination strategy are focusing on the benefits that 1) the application of the Data Protection Reform and 2) the implementation of the project will bring to SMEs, legal professionals and citizens. By using a variety of communication channels and tools partners are committed to convey the following messages to the target audience:



- The EU Data Protection Reform will facilitate business by introducing uniform and simplified rules for companies in the digital single market;
- Implementing GDPR rules will help SMEs to increase their competitiveness and to improve confidence among customers;
- GDPR strengthens citizens' fundamental rights in the digital age by giving them back the control of their personal data;
- Participants in the SMEDATA awareness-raising and training events will gain full knowledge and methodological skills allowing them in order to be effective in the application of GDPR;
- The elaborated Self-assessment tool for sustainable awareness offers SMEs and their business associations the opportunity to ensure predictable conditions and 'level playing field' for given economic sector both for customers and economic operators.
- SME representatives, legal professionals and citizens can obtain instant information and guidance on the privacy and data protection rules by using the SMEDATA mobile application.

## Communication messages and tools

The domain 'smedata.eu' has been already reserved. All public documents produced within the project, newsletters, press releases and other communication materials will be uploaded to the website. Besides, the dissemination materials include: a project leaflet, presentation slides and a newsletter (one issue every six months). The mobile application developed in the framework of the activities in WP4 will be made available to the representatives of the three target groups and the general public for free download from the mobile app stores and the project website.

A number of communication tools will be used by SMEDATA Project Partners to reach the audience such as appendices for status report details in appropriate documentation, email spread, and internal communication channels providing background context to the project and summarising the project's findings. The project will be further promoted in the specialised legal, business and IT magazines, and the social networks. Releases for the press will be distributed before and after the training seminars and



the two international conferences organised by the partners. The presentations, speeches, discussions and other materials from the international conferences will be published on the project website. Video files with the lectures from the some of the awareness and training events will also be made available online.

In addition, the communication strategy envisages cooperation with several umbrella business associations as well as with professional organisations of jurists. The collaboration with these organisations will contribute to the multiplication of the project messages to a wider audience.

## **Acknowledging EU funding**

EU funding will have a recognizable image when communicating the current Plan for Dissemination and Communication. For this purpose, all products of SMEDATA project will:

- Display the logos of the EU and the EU Rights, Equality and Citizenship Programme 2014 - 2020, and

- Include the following text:

‘This [e.g. report, publication, conference, infrastructure, equipment, other types of result, etc.] was funded by the European Union’s Justice Programme (2014-2020) & Rights, Equality and Citizenship Programme (2014-2020).’

## **Implementation Plan**

### **Targets:**

- High level of awareness about the new data protection rules among SMEs and their associations, including their legal advisors, as well as general public;
- Capacity building on data protection issues with multiplying effect for the management, legal and other expert staff of SMEs, their associations as well as other bodies representing SMEs;



- Sustainable and effective sector-based compliance with GDPR among business organisations through development and implementation of self-assessment and awareness tool;
- Exchanged experience and best practices among project partners, participants of the international conferences and training events as well as other stakeholders.

**Type and number of deliverables to be produced:**

- Self-assessment and awareness tool;
- Training info pack;
- 4 training modules;
- Awareness-raising and training seminars;
- ‘Train the trainers’ events;
- Mobile application;
- Website;
- 2 International conferences;
- Numerous dissemination materials – leaflet, newsletter, press releases, journalistic articles, special issues of the ‘Legal Tribune’ magazine, etc.

**Communication channels:**

- Social media – LinkedIn, Twitter, Google+ as well as Facebook;
- ATL – radio and television – interviews;
- ATL – paper media – press releases, interviews;
- ATL – internet media – press releases, interviews;
- BTL – events – training events under WP2, events under WP3 such as expert workshops, public consultations, initiatives under WP5;
- SMEDATA project partners’ websites;
- Website – [www.smedata.eu](http://www.smedata.eu).

More precisely, a wide variety of communication channels, tools and media to distribute the project messages to the different target groups will be used:

- National networks – project partners have wide-spread contacts with business and professionals organisations in Bulgaria and Italy and networks of local representatives who will convey the project messages and will help with the organisation of the regional seminars.



- EU network – the partners EWLA and EY have extensive networks covering all EU Member States; through the channels of those EU wide networks, the project results will receive a broad European dissemination for instance EY, as a partner in the consortium, will take the responsibility to enrich the impact of project results via its largest worldwide network which includes 230,000 highest-performing professionals that serve in 150 countries and more than 700 offices globally. The team will be proactive and timely in sharing the project output, perspectives and experience making the results visible for broader audience. Among the target audience are more than 500 EY Data Privacy specialists with proven experience in addition to the global EY clients and partners. The decision is to engage with these already strong networks, which respectively will be benefited by the information provided.
- Project website, websites of the partners and websites of the multipliers.
- Social media networks – the project will establish profiles in Facebook and Linked-In.
- Mailing lists and e-mail lists – regular mail will be used for invitations to the CEOs and the managing staff of the business organisations and the lawyer’s associations while thousands of e-mails will be sent to legal professionals and representatives of the SMEs, confirmed their interest.
- Newsletter – to be distributed via the existing lists with contacts of the partners (e.g. the partner APIS will distribute the newsletter via its web and desktop legal information products used by more than 50,000 customers, the partner SUB will send it to its members and supporters, included in an e-mail list with more than 7,000 contacts, and EWLA will distribute it to all of its members across Europe).
- Legal magazine – partner SUB will publish the reports and materials from the international conferences in Sofia and Rome in 2 special issues of its ‘Legal Tribune’ magazine.
- Awareness and training events – partners will organise 24 awareness and training seminars and 4 Training of trainers events in Bulgaria and Italy in the framework of WP2. These forums will be used as major dissemination and communication events for which organisation the partners will send several thousands of invitations to potential participants.
- Press releases to public media – before and after the organisation of the awareness and training events and the two international conferences.
- Project leaflet – to be distributed at the project seminars and public events as well as other events organised by the partners outside the project framework.
- Project mobile application – it will be freely available for download from the mobile app stores and from the project website. From its content and functionality will benefit representatives of all target groups.



- Presentations at events of the wide network of multipliers.
- Press conferences – after the Kick-off meeting and at the end of the project.

## Updating of the Plan

The Plan for dissemination and communication covers two-year period – 2019 and 2020. As communication between SMEDATA project team and project target groups is one of the key condition for the successful implementation of project activities, dissemination and communication planning will be one of the crucial project implementation constrains. Ensuring adequacy of dissemination and communication is among the most important tasks of SMEDATA project team.

Tremendous change of external project environment as well as inefficiency of proposed dissemination measures to the target groups might lead to difficulties in project execution. Thus, careful planning needs to have appropriate mechanisms for ensuring quality of these processes. Qualitative indicators:

- Participants remarks (positive/negative) attending the conferences based on feedback questionnaires;
- Feedback from readers and users of the materials and the website;
- Types of inquiries received by partners after publishing press releases;
- Level of public engagement in the project activities.

When SMEDATA project team determines deviations from what have been planned in advance, project team task force (one project coordinator from each partner) will examine case by case each deviation. In case of minor deviations, implementation of following dissemination and communication activities will be pushed in order to reach quantitative indicators. In case of major deviations, project team task force will prepare proposal for mitigation measures. The proposal will be circulated among project partners for further assessment. Whether all partners decide, following REC procedures, amendment claim will be submitted.



# Action plan

| Promotional materials and media |  | Details / short description   |
|---------------------------------|--|---|
| 1.                              | SMEDATA website                            | Electronic format, in English, Bulgarian and Italian  |
| 2.                              | Project leaflets                           | Trilingual (Bulgarian, Italian and English), PDF-file for download plus 10,000 printed copies; paper-based  |
| 3.                              | Newsletter                                 | DOCX- and PDF-files in Bulgarian, Italian and English, to be published every six months on the project website as well as distributed via the communication channels of the Partners (more than 60,000 contacts)  |
| 4.                              | Special issues of ‘Legal Tribune’ magazine | 2 special issues with 500 printed copies each in the languages of the conference reports from the two international conferences; paper-based  |
| 5.                              | Press releases                             | At least 4 press releases – before and after the completion of series of training seminars and the international conferences, in Bulgarian, Italian and English; electronic format  |
| 6.                              | Magazine articles                          | At least 6 articles, in Bulgarian, Italian or English; electronic format  |
| 7.                              | International conferences                  | Conference in Sofia with the participation of 80-100 national and international legal experts in the field of data protection; discussions will be in English and supported by simultaneous interpreting services<br><br>Conference in Rome with the participation of 80-100 national and international experts in the field of data protection; discussions will be in |



|     |                      |  |
|-----|----------------------|--|
|     |                      | English and supported by simultaneous interpreting services  |
| 8.  | Expert workshop      | 4 plenaries conducted in Sofia and Rome, in English, with more than 20 participants each, some participants will attend, some will participate via Skype under WP3 |
| 9.  | Public consultation  | Conducted via SMEDATA internet site, in English, for 6 week under WP3  |
| 10. | Awareness training   | 24 awareness and training events organised in Bulgaria and Italy for 1600 representatives of the target groups in Bulgarian and Italian.                           |
| 11. | Training of Trainers | 4 Training of Trainers: two in Bulgaria and two in Italy – 1 for each target group for at least 30 participants per event, delivered in Bulgarian and Italian      |
| 12. | Press conference     | 2 events after the Kick-off meeting and at the end of the project  |

| List of events                   | Details/short description | Target groups            | Period for realization |
|----------------------------------|---------------------------|--------------------------|------------------------|
| <b>Dissemination in Bulgaria</b> | Press conference          | Media and general public | First Quarter 2019     |
|                                  | SMEDATA website           | All target groups        | First Quarter 2019     |
|                                  | Project leaflets          | All target groups        | First Quarter 2019     |
|                                  | Newsletter                | All target groups        | First Quarter 2019     |
|                                  | Magazine article          | SME and                  | Third Quarter 2019     |





|  |  |                                  |                     |
|--|--|----------------------------------|---------------------|
|  |  | general public                   |                     |
|  | Press release                              | Media and general public         | Third Quarter 2019  |
|  | Expert workshop                            | SME representatives              | Third Quarter 2019  |
|  | 6 Awareness training events                | SME representatives              | Third Quarter 2019  |
|  | Newsletter                                 | All target groups                | Third Quarter 2019  |
|  | 6 Awareness training events                | SME representatives              | Fourth Quarter 2019 |
|  | Magazine article                           | SME and general public           | Fourth Quarter 2019 |
|  | Press release                              | Media and SME representatives    | Fourth Quarter 2019 |
|  | International Conference                   | SME representatives              | Fourth Quarter 2019 |
|  | Expert workshop                            | SME representatives              | Fourth Quarter 2019 |
|  | Press release                              | Media and general public         | Fourth Quarter 2019 |
|  | Special issues of 'Legal Tribune' magazine | Internal SME legal professionals | Fourth Quarter 2019 |
|  | Public consultation                        | SME representatives              | First Quarter 2020  |
|  | Magazine article                           | SME and general public           | First Quarter 2019  |
|  | Newsletter                                 | All target                       | First Quarter 2020  |



|  |  |                                   |                     |
|--|--|-----------------------------------|---------------------|
|  |  | groups                            |                     |
|  | Training of trainers                       | SME representatives               | First Quarter 2020  |
|  | Press release                              | Media and SME legal professionals | Second Quarter 2020 |
|  | Magazine article                           | SME and general public            | Second Quarter 2020 |
|  | Training of trainers                       | Internal SME legal professionals  | Second Quarter 2020 |
|  | Magazine article                           | SME and general public            | Third Quarter 2020  |
|  | Newsletter                                 | All target groups                 | Third Quarter 2020  |
|  | Magazine article                           | SME and general public            | Fourth Quarter 2020 |
|  | Special issues of 'Legal Tribune' magazine | Internal SME legal professionals  | Fourth Quarter 2020 |



|                               |                             |                                  |                     |
|-------------------------------|-----------------------------|----------------------------------|---------------------|
| <b>Dissemination in Italy</b> | SMEDATA website             | All target groups                | First Quarter 2019  |
|                               | Project leaflets            | All target groups                | First Quarter 2019  |
|                               | Newsletter                  | All target groups                | First Quarter 2019  |
|                               | Magazine article            | SME and general public           | Third Quarter 2019  |
|                               | Press release               | Media and general public         | Third Quarter 2019  |
|                               | Expert workshop             | SME representatives              | Third Quarter 2019  |
|                               | 6 Awareness training events | Internal SME legal professionals | Third Quarter 2019  |
|                               | Newsletter                  | All target groups                | Third Quarter 2019  |
|                               | 6 Awareness training events | SME representatives              | Fourth Quarter 2019 |
|                               | Magazine article            | SME and general public           | Fourth Quarter 2019 |
|                               | Expert workshop             | SME representatives              | Fourth Quarter 2019 |
|                               | Press release               | Media and general public         | Fourth Quarter 2019 |
|                               | Magazine article            | SME and general public           | First Quarter 2020  |
|                               | Newsletter                  | All target groups                | First Quarter 2020  |



|  |                          |                                   |                           |
|--|--------------------------|-----------------------------------|---------------------------|
|  | Training of trainers     | SME representatives               | First Quarter 2020        |
|  | Magazine article         | SME and general public            | Second Quarter 2020       |
|  | Press release            | Media and SME legal professionals | Second Quarter 2020       |
|  | Training of trainers     | Internal SME legal professionals  | Second Quarter 2020       |
|  | Magazine article         | SME and general public            | Third Quarter 2020        |
|  | Newsletter               | All target groups                 | Third Quarter 2020        |
|  | International Conference | Internal SME legal professionals  | Third/Fourth Quarter 2020 |
|  | Magazine article         | SME and general public            | Fourth Quarter 2020       |
|  | Press release            | Media and general public          | Fourth Quarter 2020       |
|  | Press conference         | Media and general public          | Fourth Quarter 2020       |

