

Minutes of the Administrative Council of the Association des  
Doctorants du campus STIC de Nice Sophia-Antipolis (ADSTIC)  
adstic@i3s.unice.fr

Secretary: Jules Mabon

December 1, 2022 - 14h15 - I3S Laboratory, Room 001 and online via zoom

Members in attendance: Laetitia GIBART (online), Amélie GRUEL (online), Quentin GUIMARD, Carlotta LUPATELLI, Jules MABON, Romain MICHELUCCI, Nina SINGLAN

Total : 7 (5 present + 2 online)

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Start of the meeting: 14h12

As decided during the previous meeting on November 17, this meeting is being held on a specific topic (GDPR and website), thus the current and future events organization is not discussed.

## 1 GDPR

Most of the information about GDPR discussed here comes from the *Guide de Sensibilisation au RGPD pour les associations*<sup>1</sup> that Amelie and Romain studied prior to this meeting.

### 1.1 CNIL

The GDPR (General Data Protection Regulation), was put in place by the EU in 2018. In France the CNIL (Commission Nationale de l'Informatique et des Libertés) is responsible for its application. Its informing and protecting the users rights, support compliance, anticipate, control and sanction.

### 1.2 Base notions

**Personal data** Any information relating to a natural person, directly or indirectly identified. Direct data allows by itself to identify the person, while indirect data allows identification by recouping several data elements.

**Processing of personal data** Any data handling, including simple consultation, not necessarily computerized.

**Purpose** Determined, explained and legitimate, cannot be modified a posteriori.

**Sensitive data** Racial or ethnic origin, political opinions, religious or philosophical beliefs, sexual orientation, union membership, genetic or biometric data. . .

For instance, Nationality and address are not sensitive data but personal data.

### 1.3 Roles

#### 1.3.1 Data Controller / *Responsable de traitement*

The data controller <sup>2</sup> defines the objectives pursued by a processing and its practical modalities. It is usually a legal representative.

For ADSTIC it would be the president of the association.

#### 1.3.2 Recipient / *Destinataire*

The recipient receives the personal data for a specific and legitimate reason.

For ADSTIC it would be the CA (*Conseil d'Administration*), some collaborating associations (*e.g.* for joint events). Also in specific cases the recipient might be some other entity; *e.g.* during the Kayak event in July 2022, the kayak rental company was provided with names and phone numbers of the participants for legitimate security reasons.

#### 1.3.3 Authorized third party / *Tiers autorisé*

The authorized third party is authorized by a legal text to receive the personal data.

The ADSTIC association is not involved with such party: though one might arise if the association were to get involved in some legal proceedings (which we hope will never happen).

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<sup>1</sup>[https://www.cnil.fr/sites/default/files/atoms/files/cnil-guide\\_association.pdf](https://www.cnil.fr/sites/default/files/atoms/files/cnil-guide_association.pdf)

<sup>2</sup>While the slides may mention “responsible of the treatment”, the European Commission uses the term data controller or data processor [https://ec.europa.eu/info/law/law-topic/data-protection/reform/rules-business-and-organisations/obligations/controller-processor/what-data-controller-or-data-processor\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/reform/rules-business-and-organisations/obligations/controller-processor/what-data-controller-or-data-processor_en)

### 1.3.4 Subcontractor / *Sous-traitant*

The subcontractor manipulates the data as part of a service or delivery.

For ADSTIC the main subcontractor is Google, handling most of the data hosting. No other subcontractor has been identified.

### 1.3.5 Data protection officer (DPO) / *Délégué à la protection des données*

The DPO can be internal, external or shared with the association, and leads the GDPR compliance process. They are not mandated in associations but highly recommended.

A DPO must have legal and technical expertise, get sufficient time and material resources and not have any conflict of interest. They must be officially declared to the CNIL.

ADSTIC does not have the internal resources to have an internal DPO (lack of time and competence). Amelie and Romain tried contacting the DPO from Université Côte d'Azur (UCA) asking if they would accept to be the shared DPO for ADSTIC and if they could answer some of our questions. The UCA DPO answered negatively to the first, and directed us to the CNIL for the second.

The people present agree that ADSTIC won't have a DPO for now as it is not mandatory.

**Carlotta:** inquires how the other associations (ADAMS, AJC06) are doing with their GDPR compliance.

## 1.4 Main principles of GDPR

### 1.4.1 Legality

The use of personal data must rely on a legal basis provided by the GDPR. The available legal basis are as follows :

1. Free, specific, informed and univocal agreement from the members
2. Execution of the contract
3. Performance of a public interest task
4. Meeting the legitimate interest of the organization
5. Compliance with a legal obligation

For ADSTIC basis 1,2 and 4 apply. Basis 1 is met as people enter their personal information willingly in the provided forms (while the information necessity is not yet completely met, we plan to remedy it: see later action points). Basis 2 is met as submitting the form with your name acts as an implicit contract between the ADSTIC and the registered members (whether the event is free or not for members). Finally, basis 4 is met as ADSTIC needs to compute some statistics on the attendance of its events, used for activity reports during the general assembly or when applying for funding.

### 1.4.2 Relevance and minimization

ADSTIC CA members must determine the data needed to meet the objective and limit the amount of data processed to reach it.

The following items of data are usually collected when making event forms :

- **First name and Surname**
- **Laboratory:** falls under the legitimate interest of ADSTIC basis.
- **Doctoral school:** only asked in specific events (when collaborating with other associations), falls under the legitimate interest of ADSTIC basis.
- **Level of education / current status:** same as above
- **E-mail address:** is now asked by default, ADSTIC needs it as a way of contacting the members registered to an event in case of any organization change or problem (providing more detailed instructions, canceled event, COVID cases etc...).

- **Phone number:** This one is to minimize. While certain events may require it for security (hiking, kayak, biking), it is not necessary for events such as afterworks for instance. In cases where waiting for late or missing people might be an issue (*e.g.* Tree climbing) we might ask it while making it non-mandatory.

We note that for events where waiting for late people is an issue, it might be better to provide to the participants a phone number to an organizer so that they can contact them in case of problem. This would greatly reduce the need for asking phone number to participants as long as the organizer agrees to share their phone number.

**ACTION:** We advise event organizers to provide their phone numbers to participants (if they are willing to, otherwise a board member might provide theirs) instead of asking participants to provide them, when the event might require it.

**Nina:** points to the fact that a previous event (Board Games in Nice, November 2022), the phone numbers of participants was asked but not necessary.

**ACTION:** The board will check the forms for non-relevant data requests (as the board already has to check the forms before sending anyway). It shall nonetheless be the duty of the organizers to prevent such requests.

### 1.4.3 Confidentiality and security

The personal data shall not be accessed by any authorized person or third-party.

Note that it also applied to both digital and physical copies of the data; leaving printed registration lists unattended is a confidentiality and security risk.

To improve security the ADSTIC google account password was changed when the new board took office. Also, the link access to the Google Drive will be revoked, and CA members will be given access individually.

The hard drive owned by ADSTIC will only be used to store anonymized information, thus its security is not critical.

### 1.4.4 Limited data retention periods

Data should be kept only for a limited time, the CNIL advises the following procedure:

1. **Active database:** when the data is necessary for the day-to-day management of the association.

For ADSTIC: members registration data is available to all CA members before and during an event. It shall be moved to phase 2 after one week or two.

2. **Intermediate archiving database:** when the data has an administrative interest, or is subject to a legal obligation. It must be accessible to specially authorized people.

For ADSTIC: only board and authorized members can access it. The people present at the meeting agree on keeping this data for two years (deleting the data anterior to the previous board: *e.g.* the 2023-2024 board would have to delete the data generated under the 2021-2022 board, while keeping data from 2022-2023). A list of emails of ADSTIC alumni may be kept for longer than those 2 years.

3. **Deletion or anonymization:** when the personal data is of no interest to the association anymore.

For ADSTIC: the data is anonymized (keeping only statistics on events). These statistics no longer hold any personal data thus do not fall under the GDPR rules.

The members present agree on aggregating the statistics on events when moving de registration data from phase 1 to 2. So that moving from 2 to 3 only requires checking that the statistics where logged before deleting the registration data.

This process only applies to the registration sheets, the event email templates and forms can be kept accessible to all CA members as long as needed as they do not contain any personal information.

### 1.4.5 Transparency and respect for people's right

The association must be transparent about the modalities and purpose of data collection.

The following information must be communicated:

- Identity and contact details of the association
- Purpose and legal basis of the processing
- Obligation or not to provide the information
- Length of time the data is kept
- Whether the data is transferred outside the EU
- How to contact the Data Protection Officer
- Association members' rights

For ADSTIC this will be detailed on a page of the new website, and a link to it will be added to all the forms.

More specially the website should specify the following users rights:

- Get confirmation that data is processed
- Object to data processing
- Request data deletion (1 month delay)
- Right to complain to the CNIL
- Request a data freeze
- Correct inaccurate or incomplete data
- Right to portability (request a copy)

Google drive may store data outside the EU. While we may change platform (*e.g.* OneDrive hosted by the University ?) this would induce some system transition work and may lead to less practical work tools for CA members.

## 1.5 5 steps to compliance

1. Make a record of processing (files) and keep it up to date.
2. Apply limited retention of data, anonymize when needed, limit access etc... CA members must be informed on these practices.
3. Transparency: inform members of the modalities and purpose of the data processing.
4. Add a GDPR contact to the website (adstic06+gdpr@gmail.com)
5. Secure the data

## 1.6 GDPR action points

Here is a summary of the GDPR related action to take:

- Adding a GDPR page on the new website, it will contain the information mentioned in 1.4.5 (Romain).
- Adding a contact email will be set up for GDPR requests (adstic06+gdpr@gmail.com) (Jules).
- Making a record of processing (Amelie).
- Anonymizing and archiving data before the previous board term (board). Amelie will have to see with Jonas KONRAD for the statistics he gathered from our current data.
- Stop link share on events Google Drive (Nina). Jules will gather the Google account emails of CA members to give them access back individually.
- Writing a guidebook for CA members giving the concrete steps they must follow to ensure GDPR compliance (Quentin and Jules)

## 2 Website

Romain presents the state of the new website (that is not online yet).

**ACTION:** Amelie and Romain will ask for the credentials to the I3S hosting server that were lost.

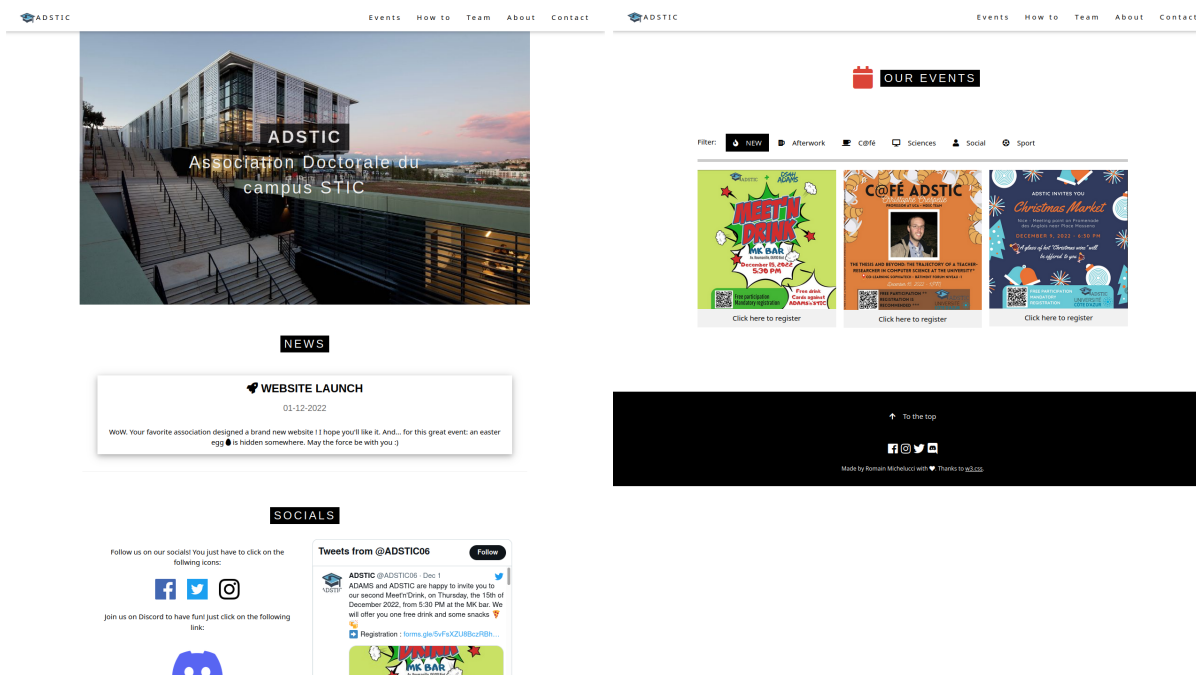
The following items are suggested to be added to the website:

- A button to add the ADSTIC calendar to your Google agenda.
- Inverting the order of the refund policies: first proposing to contact us, then reminding the general rules.
- Update the missing photos from the CA members (Romain will ask newcomers for their picture).
- Add a “Boite à idée” at the end of the event page.
- Propose people to join/contact us in the members page and the about us page.
- Have a separate page for EDSTIC related topics and PhD survival guide info.
- Redo the PhD survival guide (Romain proposes to name it “A Hitchhiker’s Guide to the PhD”). Jules will try to provide some info for that.
- Add a GDPR section (the CNIL has a template on their website).

The main page has a News section. The news items have to be edited in the website hosting files. While this is not very practical, this allows to use the free hosting provided by the University (that has no database support as far as Romain knows<sup>3</sup>), and this news would not have to be updated too often.

End of meeting: 17h15

## Website previews



<sup>3</sup>The lack of database makes the website pretty safe anyway

## REFUND &amp; CREDIT POLICY

If you wish to **obtain a refund** or **request a credit for a future event**, you can do so if you respect one of these two rules:

1. you present us a legitimate reason for your withdrawal at least 72 hours before the start of the event concerned.
2. in case of force majeure (pandemic, family death, etc.), you inform us at least before the beginning of the event.

Thus, please note that no refunds will be made if you did not attend the paid event and did not notify us of the reason for your absence.

However, do not hesitate to [contact the treasurer](#) if you consider that your case is particular and deserves our attention.

## ADMINISTRATIVE GUIDE

ADSTIC can help you in your administrative problems and even in case of [conciliation or mediation](#). Indeed, we can act as a proxy and it's always better to feel supported than to go it alone! Also please consider these useful information:

## 1. ADUM tutors

There are ADUM tutors that can help you to fill in the different steps in ADUM.

Lab	Name	Email	Year
INRIA	Charles Dupuy Rony	<a href="mailto:dupuy-rony.charles@inria.fr">dupuy-rony.charles@inria.fr</a>	Second
INRIA	Victoriya Kashtanova	<a href="mailto:victoriya.kashtanova@inria.fr">victoriya.kashtanova@inria.fr</a>	Second
INRIA	Romain Tissot	<a href="mailto:romain.tissot@inria.fr">romain.tissot@inria.fr</a>	First
INRIA	Fang Zhijie	<a href="mailto:zhijie.fang@inria.fr">zhijie.fang@inria.fr</a>	First
I3S	All Bakout	<a href="mailto:bakout19@gmail.com">bakout19@gmail.com</a>	Second
I3S	Zoubeirou	<a href="mailto:mansour.zoubeirou-a-mayak@inria.fr">mansour.zoubeirou-a-mayak@inria.fr</a>	Second
LEAT	Fatma Dhaouadi	<a href="mailto:dhaouadi.fatma1989@gmail.com">dhaouadi.fatma1989@gmail.com</a>	Second
LEAT	Tran Van Lic	<a href="mailto:vanlic.dn@gmail.com">vanlic.dn@gmail.com</a>	First

## 2. Doctoral student representatives

EDSTIC board decides on the organisation matters, pedagogical issues, awarding grants, financial supports for training, PhD student follow-up...

In this council, there are two representatives of doctoral students and one substitute. They can help you in many different ways such as mediation, advice, guidance, etc.  
Do not hesitate to contact them!

- [Artem Mulikov](#) (holder) at LEAT lab
- [Romain Michelucci](#) (holder) at I3S lab
- [Amélie d'Uzel](#) (substitute) at I3S lab

## ABOUT THE ADSTIC



The ADSTIC is an association of PhD students and postdoc located in Sophia Antipolis, southern France.

The association aims to help PhD students and postdoctoral fellows from the [SophiaTech campus](#). This includes all the PhD students from the [STIC doctoral school \(EDSTIC\)](#) as well as students and postdocs working in the different labs of the campus.

The actions of the association can be gathered in three main aspects:

- Social** - Make PhD and postdoc students meet on the SophiaTech campus.
- Scientific** - Foster exchanges of knowledge, opinions and advice.
- Administrative** - Act as an intermediary between the doctoral school and the PhD students.

## MINUTES OF THE MEETINGS

here, you can find the [#statutes](#) and the list of the minutes of the last meetings of the association:

- |                |               |
|----------------|---------------|
| 2022           | 2021          |
| • 17 November  | • 15 December |
| • 14 September |               |
| • 15 June      |               |
| • 28 March     |               |
| • 27 January   |               |

## OUR SPONSORS



## OUR TEAM

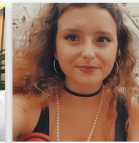
## Board



Amélie Gruel

President  
I3S Ph.D. student

[Personal Website](#)



Nina Singlan

Treasurer  
I3S Ph.D. student

[Personal Website](#)



Jules Mabon

Secretary  
INRIA Ph.D. student

[Personal Website](#)

## Team



Igor Carrara

INRIA Ph.D. student

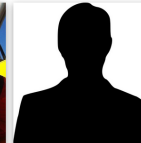
[Personal Website](#)



Laetitia Gibart

I3S Postdoc

[Personal Website](#)

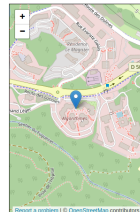


Quentin Guimard

I3S Ph.D. student

[Personal Website](#)

## FIND AND CONTACT US



## Location

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## Contact

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