



## DATA PRIVACY BRASIL RESEARCH ASSOCIATION

### Ethical Funding and Transparency Policy

*Creation: february 2020*

Data Privacy Brasil Research Association believes that funding is a vital part of the research work it performs and that, therefore, it is necessary to develop and implement an ethical and transparent funding policy, which corresponds to the principles that guide the institution.

Data Privacy Brasil Research Association is not to be confused with the company Data Privacy Ensino Ltda, despite being originated from its efforts. Data Privacy Brasil Research Association is a private civil association. Without distributing profits, bonuses or advantages to its supporters or Associates, the Association aims to develop basic/applied research of a historical, scientific, technological or statistical nature in social sciences, humanities, exact sciences and information technology. It also intends to promote the availability of academic content, within the principles of democratic participation, freedom and social justice.

In order to advance its objectives in an ethical manner, we understand that compliance with this Ethical Funding and Transparency Policy (“Policy”) is fundamental.

#### **1. Introduction**

##### **1.1. Definitions**

“Funder” means any entity providing funds, in any amount, to Data Privacy Brasil Research Association.

“Funding” means support, commonly in the form of financial resources, but which can also take the form of services provided by the funder for Data Privacy Brasil Research Association. Funding is always a voluntary and unilateral support by the funder, not implying any service provided, in exchange, by Data Privacy Brasil Research Association.

“Policy” means this Ethical Funding Policy, approved in March 2020 by the Directors of Data Privacy Brasil Research Association.

“Reviewer (s)” means the group responsible for conducting a thorough review of funding proposals directed to Data Privacy Brasil Research Association that exceed the amount of R \$ 200,000.00.

##### **1.2. Principles**



In order to guarantee the independence and integrity of the organization, any funding that may be obtained by Data Privacy Brasil Research Association must conform to the following principles:

- funding cannot, in any way, harm the relationship of Data Privacy Brasil Research Association and Data Privacy Brasil and its institutional partners or students;
- funding cannot, under any circumstances, compromise organizational independence and autonomy, including by influencing research priorities, decisions and results;
- funding cannot compromise the reputation of Data Privacy Brasil Research Association and Data Privacy Brasil or its members;
- funding must necessarily comply with all applicable laws in the national territory.

## **2. General Provisions and Funding Review**

Data Privacy Brasil Research Association has full discretion as to whether or not to receive financial contributions from different sources, and whether or not to disclose a financing rejection.

In the case of funding that exceeds the R\$ 200,000.00 mark, the proposal will be submitted to review by a Group of Independent Reviewers, who will determine whether the funding should be accepted or not. The analysis will take into account the ethical parameters established in this Policy, as well as other principles that guide the activities of Data Privacy Brasil Research Association, and, finally, any reasons it considers appropriate, considering the nature and scope of the financing in question.

Funding that does not reach R\$ 200,000.00 will not be subject to review by the Reviewers, but all funding must comply with the provisions of this Policy.

## **3. Funding sources**

### **3.1. Public funding**

Data Privacy Brasil Research Association will accept funding from governments or state entities when the following conditions are met:

The independence and autonomy of Data Privacy Brasil Research Association, including its priorities and research results, must be fully preserved.

Data Privacy Brasil Research Association must make sure that the involvement with the funder will not bring any risks, of a political or any other nature.

Data Privacy Brasil Research Association shall ensure that the funder's policies and practices are aligned with its purposes and principles, as well as the principles of this Policy.

### **3.2. Funding by companies**



Data Privacy Brasil Research Association will accept funding from the private sector when the following conditions are met:

The contracting between the funder and Data Privacy Brasil Research Association should make it clear whether it is philanthropic or commercial / sponsorship funding.

The independence and autonomy of Data Privacy Brasil Research Association, including its priorities and research results, must be fully preserved.

Data Privacy Brasil Research Association must ensure that the funder's reputation will not tarnish its own reputation by association. Data Privacy Brasil Research Association will not accept funding from companies with a history of illegal or unethical practices.

When the cash value of Data Privacy Brasil Research Association exceeds R\$ 300,000.00, the slice referring to funding by companies cannot exceed 40% of the total value of the funding.

### **3.3. Funding by NGOs and Nonprofits**

Data Privacy Brasil Research Association will accept funding from non-governmental and non-profit foundations, when the following conditions are met:

The independence and autonomy of Data Privacy Brasil Research Association, including its priorities and research results, must be fully preserved.

Data Privacy Brasil Research Association must ensure that the funds are of legal and transparent origin.

Data Privacy Brasil Research Association shall ensure that the funder's reputation and background are consistent with its purposes and principles, as well as the principles of this Policy.

## **4. Transparency**

Funders of Data Privacy Brasil Research Association will disclose their support, as well as specific projects, upon authorization.

Data Privacy Brasil Research Association will disclose, by any means, including its website, the names of its funders, the sector to which they belong, and the amounts of the fundings.

Data Privacy Brasil Research Association will not disclose confidential data about the funder or the funding, including values, unless expressly authorized to do so.

Data Privacy Brasil Research Association will disclose, by any means, including its website, report on its funds, including origin, and annual expenses. This report must comply with parameters



established by laws and regulations and must present a clear and concise picture of the association's situation for its funders, partners and other stakeholders.

## **5. Conflict of interest**

Members of project teams funded by philanthropies and private companies will not be able to individually receive funding from these actors during the execution of the projects.

Conflicts of interest arising from parallel professional experiences, which go beyond engagement with Data Privacy Brasil Research Association, must be formally reported to the Independent Reviewers Group, which must express itself, in writing, about the conflict of interest. The analysis must be carried out, necessarily, by two external persons.

## **6. Presentation of the policy to funders**

This Policy should be presented, preferably, at the beginning of negotiation processes with funders, ensuring that they are aware of the choices made by Data Privacy Brasil Research Association on ethical and transparency criteria for receiving funds.

## **7. Policy Update and Dissemination**

The Policy should be reviewed and updated annually or at a shorter period when circumstances make more urgent changes to the provisions necessary. Whenever the Policy is changed, the new version must be sent to all Employees via email with precise indications, pointing out the differences in relation to the previous version.

The Policy must be sent to the e-mail of every Employee at the moment that he / she joins the work team, together with a brief summary of the Policy in the body of the e-mail so that such Employee can learn about the culture and principles of the RA.

In addition, the Policy must be disseminated internally on a regular and periodic basis. When this communication takes place in other formats such as posters, pamphlets or memos, it is enough to indicate where the Employee can find the Policy within the RA portal.

This Policy is effective as of March 2020 for all members of Data Privacy Brasil Research Association.