Privacy by Design Contest

For mobile Health (mHealth) applications

RULES OF CONTEST

1. OBJECTIVE AND CONTEXT

1.1 Introduction

The European Data Protection Supervisor (EDPS), in partnership with the Data Protection Authorities of Austria, Ireland and Schleswig-Holstein and supported by the Internet Privacy Engineering Network (IPEN), is pleased to launch the EDPS-IPEN Privacy by Design Contest for mobile Health (mHealth) applications.

This initiative aims to showcase and promote privacy engineering by awarding prizes to two mHealth applications implementing the "privacy by design and by default" principles, and contribute to the development of best practices for the privacy-friendly development of mobile apps.

The area of mHealth has rapidly expanded in recent years. mHealth apps have the potential to create benefits in the life of individuals, lower the cost of healthcare and give patients more control over their own health. At the same time, processing health related data at large scale and over connected devices may create new risks regarding security and misuse of personal data, which could adversely affect users' interests and fundamental rights. There is a widely shared perception that smart devices and mobile apps have to develop better measures for effective protection of personal data and integration of the principles of privacy by design and by default. Filling this gap is of utmost importance and urgency. We encourage healthcare providers and developers to accept this challenge and consider the protection of privacy and personal data as a priority.

In his Opinion 1/2015 on Mobile Health, the European Data Protection Supervisor (EDPS) called on healthcare providers to accept the responsibility for processing vast amounts of sensitive health data through mobile apps. He also recommended that developers adopt the principles of privacy by design and by-default when designing their apps, which includes adopting available Privacy-Enhancing Technologies (PETs). Data protection by design and by default will become a legal obligation in the European Union from 25 May 2018 with Article 25 of the General Data Protection Regulation (GDPR)[1].

1.2 Scope of the contest

The contest is limited to mHealth applications for mobile devices such as smartphones and tablets.

The app shall deliver health related services by processing personal health data. mHealth applications may also process lifestyle and well-being information[2]. Only apps processing data falling under the above definition will be considered in scope.

These Rules of Contest overrule any statements made in the web pre-announcement published on the EDPS website on 28 March 2018.

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[1] Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation); OJ L 119, 04.05.2016, p.1: http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX%3A32016R0679

[2] If life style and wellbeing data are processed in a medical context (e.g. upon medical advice) or allow to infer information regarding an individual's health (with or without combining it with other information), they are considered health data.

2. PRIZE AMOUNTS

A total budget of EUR 30 000 EUR is available for this prize, offering two awards as follows:

- The application ranking as first in the selection will be awarded EUR 20 000.
- The application ranking as second in the selection will be awarded EUR 10 000.

Both winners will have the opportunity to present their applications at the 40th International Conference of Data Protection and Privacy Commissioners (ICDPPC), which will take place in Brussels on 22-26 October 2018. The EDPS will reimburse the travel expenses for 2 persons representing each winning application at the award ceremony.

3. TIMELINE

ACTION	DEADLINE
Launch date of the contest and opening for submissions:	30 April 2018
Closing date for submissions:	03 August 2018 at 17.00 Central European Summer Time (CEST)
Evaluation and solution demonstrations:	August-September
Award decision:	28 September 2018
Prize Award ceremony (at ICDPPC 2018)	23 - 25 October 2018

4. ELIGIBILITY

The contest is open to any legal entity (including natural persons) or group of legal entities established in an EU Member State.

Contestants who have already received an EU prize for their application cannot receive a second prize for the same application.

Contestants are allowed to submit an application only if they are in possession of the necessary legal rights on the app and relevant supporting documentation required.

Contestants will be excluded if they (or one of them, if in a group):
* are subject to an administrative sanction (i.e. exclusion)[3]
* are in one of the following situations[4]:
    * bankrupt, being wound up, having their affairs administered by the courts, entered into an arrangement with creditors, suspended business activities or subject to any other similar proceedings or procedures under national law (including persons with unlimited liability for the contestant's debts)
    * declared in breach of social security or tax obligations by a final judgment or decision (including persons with unlimited liability for the contestant's debts)
    * found guilty of grave professional misconduct[5] by a final judgment or decision (including persons having powers of representation, decision-making or control)
    * convicted of fraud, corruption, involvement in a criminal organisation, money laundering, terrorism-related crimes (including terrorism financing), child labour or human trafficking (including persons having powers of representation, decision-making or control)
    * shown significant deficiencies in complying with main obligations under a procurement contract, grant agreement or grant decision financed by the EU or Euratom budget (including persons having powers of representation, decision-making or control)
    * found guilty of irregularities within the meaning of Article 1(2) of Regulation No 2988/95 (including persons having powers of representation, decision-making or control)
* have misrepresented information required for participating in the contest or fail to submit such information
* were involved in the preparation of the contest and this entails a distortion of competition.

Contestants may consider submitting an application for consideration on their own or decide to collaborate with others in a group of contestants. In the latter case, the group must appoint a 'lead contestant' to represent them towards the EDPS, but all contestants will be jointly responsible and must fulfil all the conditions set out in these Rules of Contest.

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[3] See Articles 131(4) and 106(1) of the Regulation (EU, Euratom) No 966/2012 of the European Parliament and of the Council of 25 October 2012 on the financial rules applicable to the general budget of the Union and repealing Council Regulation (EC, Euratom) No 1605/2002 (OJ L 218, 26.10.2012, p.1) - hereafter Financial Regulation or (FR).

[4] See Articles 138(2) and 106(1), 107 Financial Regulation.

[5] Professional misconduct includes: violation of ethical standards of the profession, wrongful conduct with impact on professional credibility, false declarations/misrepresentation of information, participation in a cartel or other agreement distorting competition, violation of IPR, attempting to influence decision-making processes or obtain confidential information from public authorities to gain an advantage.

5. AWARD CRITERIA

A jury of experts will evaluate all eligible applications.

The prizes will be awarded to the applications that, in the opinion of the jury, demonstrates a solution that best addresses the following cumulative criteria:

1. Functionality
2. Usability and accessibility
3. Personal data protection
4. Completeness, relevance and quality of the deliverables

The contestant shall document how the proposal satisfies each and every of these criteria.
A description of the cumulative criteria follows.

5.1 FUNCTIONALITY

The app should enable better care of personal health and contribute to relevant individuals' empowerment. Adherence to adopted common standards and best practices is an advantage.

The elements that follow contribute to the assessment:

- The app can be securely downloaded from where it is publicly available, and easily installed.
- The app should provide stable and reproducible output.
- The app functions as described in the provided documentation and in in-app guidance.
- The app contributes to individuals' personal healthcare by processing their personal data. Contestants should be prepared to provide scientific evidence for the claimed health benefits.
- The app enhances individuals' control over their personal data and healthcare.

5.2 USABILITY AND ACCESSIBILITY

The app should be user friendly and accessible, taking into account, as applicable, the relevant health context. Adherence to adopted common standards and best practices will represent an advantage.

5.2.1 Usability

The elements that follow contribute to the assessment:

- Completeness - Extent or completeness of user's solutions to tasks
- Ease in data input or import - Simple means to provide input or import data to the app
- Ease of interoperability and export - App allows easily to share or/and export input and output
- Ease in using output - App output is easy to understand and accurate
- Time efficiency - App reacts fast and its tasks are accomplished fast
- Ease of learning / Intuitive use - App can be used intuitively or/and contains guidance
- Storage space and energy efficiency - App consumes little storage space and energy

5.2.2 Accessibility

The elements that follow contribute to the assessment:

- Information and user interface components are presented to users in ways they can perceive.

This includes considerations on screen size, zoom/magnification features and contrast

- Users are able to operate the interface, which cannot require interaction that a user cannot perform.
  This includes considerations on keyboard control for touchscreen devices, touch target size and spacing, touchscreen gestures, device manipulation gestures and buttons location.

- Users are able to understand the information as well as the operation of the user interface.
  This includes considerations on screen orientation, consistent layout, page elements positioning, clear indication of actionable elements and instructions for custom touchscreen and device manipulation gestures.

- In an eHealth ecosystem, content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
  This includes considerations on adequately using mark-up languages and meta elements, and data parsing and implementations such as adapting the virtual keyboard and other entry methods to the context, easy methods for data input and supporting all the features the platform offers.

5.3 PROTECTION OF PERSONAL DATA

The proposed solution should protect individuals and their personal data based on the principles and rules established by the applicable EU data protection law.

Contestants may consult relevant documentation, such as the GDPR, the ePrivacy Directive[6], and guidance documents from the EDPS and the Article 29 Working Party (WP29), e.g. the EDPS Guidelines on mobile applications, on web services, on IT governance and IT management, and the WP29 opinion on apps on smart devices.

The elements that follow contribute to the assessment of this criterion.

5.3.1 Data protection principles

The app is designed and operated in such a way as to implement the EU data protection principles, in particular:

1. lawfulness, fairness and transparency (including notice to data subjects and enabling data subjects' rights)
2. purpose specification and limitation
3. data minimisation with respect to the purposes (necessity and proportionality)
4. accuracy
5. storage limitation (data retention requirement)
6. data security (confidentiality, integrity and availability)

The contestant shall document how the application implements the principles described above.

The elements that follow contribute to the assessment.

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[6] Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector, OJ L 201, 31.7.2002, p.37;: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:02002L0058-20091219

5.3.1.1 Lawfulness, fairness and transparency

- The app processes personal data under a lawful basis under EU law.
- The app provides features to support the lawfulness. For example, in case of "consent":
  - The app adequately informs users and obtain their consent before installing any application on users' smart mobile devices.
  - The app provides a feature to manage users' consent, including its withdrawal.
  - The app enables users to consent at a sufficiently granular level as to data types and the purposes they are used for. If the operating system does not support this feature, the app provides it at implementation level.
  - The app enables users to provide their consent as freely given, which implies i.e. that users are able to use the app even if they do not consent to purposes that are not essential to provide the services expected.
- The processing of personal data by the app meets the expectations of the users based on the description of its functionality, even if they do not read the entire data protection notice provided.
- The app provides complete, straightforward and easy to understand information to users, tailored to the audience. Children may require specific information.
- The app informs users on the way it processes their personal data in an effective and efficient way so that they can take informed decisions when needed (e.g. layered notices, icons, real time info).
- The app provide individuals whose data are processed with features to exercise their rights to access, rectify and delete their personal data as well as to object to their processing.
- The app informs the users of any algorithms/workflow the app supports and automates, in an easy and understandable way.
- The app provides users with the possibility to comment or intervene in any process the app automates that has an impact on them (e.g. an algorithm to classify their behaviour).

5.3.1.2 Purpose specification and limitation

- The app provides information on the functionality and purposes pursued when processing personal data to the people whose data are processed. This information should be specific and describe situations where the same type of personal data is used for many purposes.
- The app does not reuse personal data collected for other purposes incompatible with the original purpose as advertised in the data protection notice. The app functionality and its operational instructions and policies should support this requirement.

5.3.1.3 Data minimisation

- The app uses only personal data that are strictly necessary to deliver the service as described.
- The app only uses personal data that are relevant to the services it provides, in a way proportionate to the benefits to the users with respect to the associated risks.
- The app clearly indicates optional services and, if their lawfulness is based on consent, seeks prior, specific, free consent to operate them.

- If the app uses personal data to provide anonymous statistics, it will effectively delete the data processed to build those statistics or anonymise them in a way that no re-identification is possible.

5.3.1.4 Accuracy

- The app provides features for users to maintain their personal data always accurate and up-to-date.
- The app provides features to increase data accuracy such as consistency checks or the use of itemised fields.
- If third parties collect some personal data, the app and/or its documentation should give evidence that these parties take care of the accuracy of these data.

5.3.1.5 Storage limitation

- The app keeps personal data (relating identified or identifiable people) only as long as necessary for the services it provides. The app and/or its documentation gives evidence that those personal data, when no longer necessary, are effectively deleted or anonymised.
- Processing time limits are defined based on the data type and the purposes they are used for. These limits are communicated to the users via the data protection notice.

5.3.1.6 Data security

- The app ensures the confidentiality, integrity and availability of personal data at rest and in transit, based on "state of the art" technology, best practices and standards.

5.3.2 Privacy and data protection by design and by default

The app implements the principles of privacy and data protection by design and by default and contribute to advancing the state of the art in the domain. Briefly, the principles of privacy and data protection by design and by default imply that:

- Privacy and data protection requirements are taken into account from the outset and during the whole lifecycle of the design, development and operation, maintenance and end-of-life of the app or its use by the data subject.
- The default configuration of the app is such as to minimise personal data collection and relevant processing to what is strictly necessary to all the utilisations that have been clearly documented and transparently communicated to the people whose data are processed, in line with their reasonable expectations.

Contributing to advancing the state of the art of technology and processes used to protect privacy and personal data is considered a significant advantage. Examples of privacy enhancing technologies can be found for instance in the ENISA publication: "Privacy and Data Protection by Design – from policy to engineering".

5.3.3 Other features and requirements

- The app provides a feature to export personal data based on common interoperable electronic formats.
- The app provides adequate mechanisms logging the processing of personal data.

5.4. COMPLETENESS, relevance and quality of the deliverables

Deliverables should satisfy the requirements laid down in section 7. EXPECTED DELIVERABLES

6. APPLICATION SUBMISSION

Contestants shall submit their application for evaluation by using the dedicated contest entry web-form (see Template in Annex 1) on the EDPS website.

The mandatory supporting documents are set out in section 7 and should be uploaded using the contest entry web-form. The jury may consider incomplete applications as inadmissible. Contestants may be asked at a later stage for further documents (for legal entity validation, bank account validation, or supporting the declaration of honour, etc.).

Applications must be submitted by the (lead) contestant as detailed under this section and section 7 by 03 August 2018 at 17.00 CEST.

7. EXPECTED DELIVERABLES

Contestants shall develop and demonstrate the solution in the form of a mobile app. The app should be publicly available for installation for a significant user base and support two or more mobile operating systems. The app server backend, if any, of the service supported by the app is expected to work when the app is submitted to the contest organisers for assessment.

In addition to the app and the information required in the contest entry form the contestants shall provide the following deliverables in PDF format:

a) Mobile app technical design specifications and functional / non-functional requirements documentation and implementation plan. This document should allow the jury to understand the technological and architectural solution, the functions of the app and the advantages for its users, and changes that have occurred or evolved during the implementation (50 pages max)

b) A report on the approach taken to implement privacy and data protection by design and by default, including an assessment of personal data protection risks posed by the use of the app to individuals, developed privacy features and privacy enhancing technology used (30 pages max)

c) User and/or operational manual, including relevant data protection operational advice (10 pages max)

d) The data protection notice of the service supported by the app, any layered transparency or notification material supporting it as well as any information based on Article 5.3 of the ePrivacy Directive, e.g. cookie notice and management (10 pages max)

e) A description of the components (e.g. the server side, other online "objects") the app exchanges data with, including detail on relevant interfaces such as network addresses, protocols used to communicate and any other pieces of information useful to the assessment according to the criteria provided above (30 pages max)

Contestants shall use clear and plain English language.

Contestants shall ensure that all the deliverables and the components the app exchanges data with are free from all kinds of malicious code.

8. EVALUATION

8.1. PROCEDURE

The jury will first evaluate the eligibility of each submitted application based on the criteria set in section 4.

If more than five among the applications submitted pass the eligibility criteria, the best five will be pre-selected on the grounds of a documentary assessment based on the award criteria.

The five pre-selected applications, or all eligible applications in case they are less or equal to five, will then undergo the second phase, which will include technical tests of the apps.

The pre-selected contestants may be invited for a hearing with the jury at the EDPS premises in Brussels, to demonstrate their solution on a prototype running in an operational environment. The expenses linked to the hearings will not be reimbursed by the EDPS. The possible hearings will take place in the month of September, with exact dates to be scheduled in line with the availability of jury members and contestants, and may be performed remotely.

The final score (see section 8.2) allocated will take into account the outcome of the assessment of the deliverables, of the technical tests and of the hearing.

The jury evaluation is planned to take place in July-September 2018.

8.2. ASSESSMENT AND PRIZE AWARD

The jury will assess the applications against the award criteria set in section 5.

The jury will assign scores to each set criterion of each eligible app, according to the following schema:

Criterion	Max score	Pass mark
1) Functionality	20	12
2) Usability and accessibility	10	6
3) Personal data protection	44	24
4) Completeness, relevance and quality of the deliverables	8	4

The score in each criterion is established based on the following assessment:

Classification	Interpretation	Scores
No proposal or completely unsatisfactory proposal	The proposal fails to meet the criterion and/or it does not work; and/or no answer is given; and/or its meaning is totally unclear.	0-5 for criterion 1 0-2 for criterion 2 0-11 for criterion 3 0-1 for criterion 4
Unsatisfactory proposal	The proposal has significant shortcomings in a number of aspects and/or is inconsistent in a number of identifiable respects and/or its meaning is partially unclear and/or irrelevant to the objective.	6-11 for criterion 1 3-5 for criterion 2 12-23 for criterion 3 2-3 for criterion 4
Partially acceptable proposal	The proposal meets the criterion but has some shortcomings that render it partially satisfactory and/or not specific to the objective.	12-15 for criterion 1 6-7 for criterion 2 24-31 for criterion 3 4-5 for criterion 4
Satisfactory and acceptable proposal	The proposal meets satisfactorily the requirements of the criterion.	16-18 for criterion 1 8-9 for criterion 2 32-39 for criterion 3 6-7 for criterion 4
Excellent proposal	The proposal meets largely or exceeds the requirements of the criterion.	19-20 for criterion 1 10 for criterion 2 40-44 for criterion 3 8 for criterion 4

Applications having been assigned a score below the pass mark in one or more criteria will be excluded from the final ranking.

The final score is calculated by summing up the scores awarded in each of the four criteria.

The applications collecting the first and the second final scores will be awarded the prizes as detailed in section 2.

For applications with the same final score, the jury will determine a priority order according to the following approach: the score for the criterion No 3 will be given a weight of 2 and the score for criterion No 1 will be given a weight of 1.5. If, after this prioritisation, two or more applications tie for the same rank, the prize will be equally divided and awarded to all the applications in the tie.

All participants will be informed at the end of September 2018 on the outcome of the contest.

9. OTHER CONDITIONS

9.1 PAYMENT ARRANGEMENTS

The prize money will be paid to the (lead) contestants in one instalment after the award ceremony by bank transfer, provided all the requested documents have been submitted.

9.2 USE OF DELIVERABLES AND PUBLICITY OF THE PRIZE

The EDPS will use the app and the other deliverables the contestants provide for the purposes of the evaluation, within the contest and to publicise the contest.

The EDPS may publicise the winning applications, the names of the contestants and the prizes awarded in the ways it considers most appropriate with a view to carry out its institutional tasks. This includes disclosing possible best practices relating to the application of the principles of privacy by design and by default.

The intellectual property rights associated to the app and to its use stay with the contestants.

The contestants awarded the prizes may publicly refer to the fact of being awarded the prize and, only if having obtained prior specific approval by the EDPS and without any right to exclusiveness, use the EDPS-IPEN 2018 Privacy by Design Prize logo in a communication context strictly related to the app being awarded.

Nonetheless, they shall not claim any further assessment or statement (e.g. GDPR compliance certification) allegedly originating from the EDPS, nor shall they use any other graphic symbol clearly relating to the EDPS.

Photos and videos taken by the EDPS and any other material created by the EDPS, and relating to the preparation of the contest or to the award ceremony, are the property of the EDPS.

9.3 PROCESSING OF PERSONAL DATA

Any personal data related to the contest will be processed by the EDPS under Regulation No 45/2001[7] and in accordance with the relevant notification in the EDPS notification register. The data protection notice to contestants is on the contest entry web-form page.

9.4 ETHICS AND COMPLIANCE

The activities the app is planned to support should be in line with:

(a) ethical principles (e.g. for ethical considerations on the use of technology, you may refer to the 2018 Report of the EDPS Ethics Advisory Group) and

(b) applicable international, EU and national law.

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[7] Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data (OJ L 8, 12.01.2001, p. 1).

The information contained in the submitted applications shall comply with all applicable EU law, including on the security of information.

The contestants must ensure that the activities the app is planned to support have an exclusive focus on civil applications.

The contestants must ensure that the activities the app is planned to support do not:

(a) aim at human cloning for reproductive purposes

(b) intend to modify the genetic heritage of human beings which could make such changes heritable (with the exception of research relating to cancer treatment of the gonads) or

(c) intend to create human embryos solely for the purpose of research or for the purpose of stem cell procurement, including by means of somatic cell nuclear transfer.

9.5 CONFLICT OF INTERESTS

The contestants must take all measures to prevent any situation where the impartial and objective award of the prize is compromised for reasons involving economic interest, political or national affinity, family or emotional ties or any other shared interest ('conflict of interests').

They must inform the EDPS without delay of any situation constituting or likely to lead to a conflict of interests and immediately take all the necessary steps to rectify this situation.

The EDPS may verify that the measures taken are appropriate and may require additional measures to be taken by a specified deadline.

9.6 APPLICABLE LAW

The contest is governed by the applicable Union law complemented, where necessary, by the law of Belgium. The General Court or, on appeal, the Court of Justice of the European Union, shall have sole jurisdiction to hear any dispute between the Union and any participant concerning the interpretation, application or validity of the rules of this contest, if such dispute cannot be settled amicably.

9.7 LIABILITY FOR DAMAGES

The EDPS shall not be held liable for any damage caused or sustained by any of the contestants, including any damage caused to third parties as a consequence of or during the implementation of the activities related to the contest.

9.8 CHECKS, AUDITS AND INVESTIGATIONS

Contestants accept that the EDPS, the European Anti-Fraud Office (OLAF) and the European Court of Auditors may carry out checks, audits and investigations in relation to the contest and the received prize.

9.9 WITHDRAWAL OF THE PRIZE — RECOVERY OF UNDUE AMOUNTS

The EDPS may withdraw the prize after its award and recover all payments made, if it finds out that:

(a) false information, fraud or corruption was used to obtain it

(b) a winner was not eligible or should have been excluded

(c) a winner is in serious breach of its obligations under these Rules of Contest.

9.10 ADMINISTRATIVE SANCTIONS

If a contestant has committed irregularities or fraud or has made false declarations, the EDPS may also:

(a) exclude the contestant from all future contracts, grants and contests financed from the EU or Euratom budget for a maximum of five years (or 10 years in case of repetition) and/or

(b) impose a financial penalty between 2% and 10% of the value of the prize (or between 4% and 20% in case of repetition).

9.11 CANCELLATION OF THE CONTEST

The EDPS may cancel the contest or decide not to award the prize, without any obligation to compensate contestants, if:

(a) no applications are received

(b) the jury does not find a winner

(c) the winner is not eligible or must be excluded or

(d) the EDPS and the supporting organisations find that the objective of the contest is no longer valid or cannot be achieved.

9.12 COMPLAINTS

Complaints against decisions taken by the EDPS and negatively affecting the rights of a contestant or winner can be brought before the EDPS for possible award review requests and before the General Court, or, on appeal, the Court of Justice of the European Union, under Article 263 of the Treaty on the functioning of the EU (TFEU).

10. CONTACT

For more information, please see the contest webpage.

In case of questions, please send an email to privacy-prize@edps.europa.eu
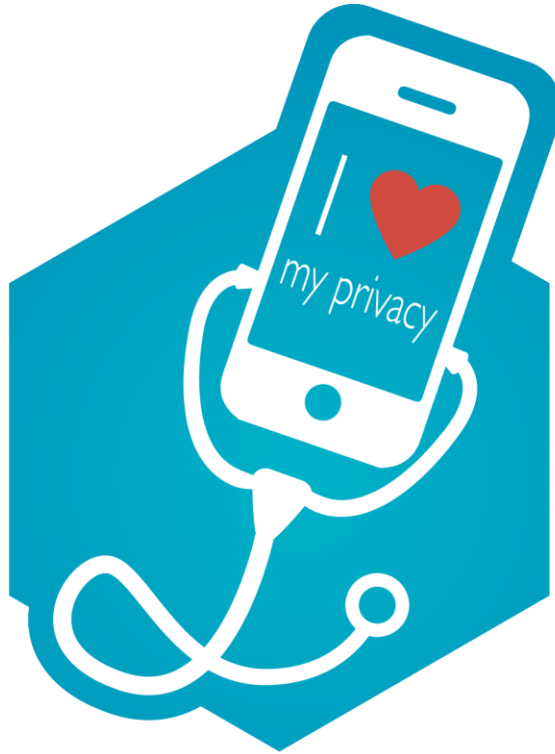
Privacy by Design Contest

For mobile Health (mHealth) applications

ANNEX 1 - TEMPLATE ENTRY FORM

NB. This template is provided for information only.

The entry form must be filled in and submitted online.

Declaration of compliance with the Rules of Contest

By entering the contest and submitting an application for evaluation, contestants declare they have carefully examined the Rules of Contest and agree to be bound by these Rules. In particular they declare on their honour to meet:

- the eligibility criteria in section 4
- the ethical and legal compliance requirements in section 9.4
- the requirements on absence of conflicts of interest as specified in section 9.5.

Entrants will be asked to provide the following information:

Part I - About the (lead) contestant

1. Full name
2. Email address
3. Address (street, city, postal code)
4. Country of residence/establishment (limited to the 28 EU Member States)
5. Phone number

Part II - About the app
6. App name
7. Short description of the app (150 words max)
8. Link(s) to the app store(s) (where the app is publically available to install)

AND upload the following documentation in Portable Document Format (PDF):

a) Mobile app technical design specifications and functional / non-functional requirements documentation and implementation plan. This document should allow the jury to understand the technological and architectural solution, the functions of the app and the advantages for its users, and changes that have occurred or evolved during the implementation (50 pages max)

b) A report on the approach taken to implement privacy and data protection by design and by default, including an assessment of personal data protection risks posed by the use of the app to individuals, developed privacy features and privacy enhancing technology used (30 pages max)

c) User and/or operational manual, including relevant data protection operational advice (10 pages max)

d) The data protection notice of the service supported by the app, any layered transparency or notification material supporting it as well as any information based on Article 5.3 of the ePrivacy Directive, e.g. cookie notice and management (10 pages max)

e) A description of the components (e.g. the server side, other online "objects") the app exchanges data with, including detail on relevant interfaces such as network addresses, protocols used to communicate and any other pieces of information useful to the assessment according to the criteria provided above (30 pages max)