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OCCTET

Open Source Compliance Comprehensive tools and resources designed to simplify and streamline the CRA compliance process for SME, allowing them to tackle the complexities of OSS compliance.

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Deliverable Type (content): The Data Management Plan describes how partners should manage data collected during the project and more generally, data collected by the tools.
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Document History

Version	Date	Issued By	Status	Comments
1.0	31-01-2025	DO	Final	Approved deliverable for submission to the European Commission.
1.1	18-02-2026	DO	Final	Addressing the recommendations from the Review Report

Executive Summary

The OCCTET project's D1.3 report outlines the ethics, data, and IPR management framework for simplifying Cyber Resilience Act (CRA) compliance for SMEs using Open Source Software (OSS) over 24 months.

The framework is built on four core pillars: maintaining high **Ethical** standards, using open source licenses for project outputs (**IPR**), ensuring secure and GDPR-compliant data handling (**Data**), and implementing privacy-by-design (**Privacy**). The project engages participating SMEs in three stages to gather baseline, ongoing, and concluding data, focused on CRA compliance metrics.

Keywords: Cyber Resilience Act (CRA), SMEs, FOSS, Open Source Compliance, Data Management Plan (DMP), Intellectual Property Rights (IPR), GDPR Compliance, Privacy-by-design, Ethical Standards.

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1 Introduction

Summary of the report on Ethics, Data, and IPR Management.

[This summary section is a placeholder for the final report to be delivered at the end of the project. This comment will be removed and replaced with the summary text.]

2 Plan

2.1 Objectives

The primary objectives for Project OCCTET with respect to data, IPR, privacy, and ethics are as follows:

Ethics: To operate under the highest ethical standards, ensuring accountability, inclusivity, and respect for all stakeholders.

IPR: To publish under open source licenses and protect the intellectual property generated during the project and ensure equitable access for SMEs, fostering innovation and compliance with the CRA and other applicable regulations.

Data: To collect, process, and manage data securely and efficiently, ensuring it is used for achieving the project's goals while adhering to GDPR and other regulatory standards. Open data, where possible, is preferred.

Privacy: To implement privacy-by-design principles to safeguard possible personal data and maintain transparency regarding its use.

2.2 Implementation Plan

To achieve these objectives, OCCTET will undertake the following activities:

Initial Engagement: Double Open, led by Martin von Willebrand, will initiate contact with each participant at the start of the project. This engagement will focus on:

Informing participants about the project's objectives in relation to data, IPR, privacy, and ethics. Gather participants feedback about the objectives, and finetune the objectives, where necessary.

Explaining the importance of their contributions and the procedures for data handling.

Requesting participants to provide data specific to their organization, including compliance metrics and feedback relevant to the CRA.

Ongoing Support and Oversight: Martin von Willebrand and his team will remain in regular communication with participants to address concerns, provide guidance, and ensure adherence to ethical and privacy standards throughout the project.

Final Engagement: Near the conclusion of the project, Double Open will reconnect with all participants. The follow-up activities will include:

Reiterating the project's objectives and summarizing interim findings.

Collecting final data from participants to evaluate their compliance journey and overall experience.

Ensuring participants' feedback is incorporated into the final reporting.

Data Recording and Reporting:

- All data collected during the project will be securely stored and used to produce comprehensive reports. These reports will document:
- The progress made by SMEs in complying with the CRA.
- Key insights into the challenges and successes encountered.
- Recommendations for future initiatives to support SMEs in similar contexts.

2.3 Tasks and Timeline

2.3.1 Tasks

- Generation of Plan: Double Open, led by Martin von Willebrand, will develop the project's detailed plan.
- Contacting Participants (First Round): Martin von Willebrand will reach out to participants to inform them of objectives and request initial data.
- Participants Providing Initial Data: Participants will submit data specific to their organizations.
- Contacting Participants (Final Data): Double Open will follow up with participants to collect final data.
- Participants Providing Final Data: Participants will provide the concluding data for their organizations.
- Data Collection and Analysis: Double Open will compile and analyze the data from participants.
- Finalizing the Report: Martin von Willebrand will lead the creation of the final report based on collected data and analysis.

2.3.2 Timeline

- **Month 1-3:** Generation of the detailed plan.
- **Months 4-6**: Initial data collection (contacting participants and receiving initial data).
- **Months 18-22**: Final data collection (contacting participants and receiving final data).
- **Months 23-24**: Finalizing the report and delivering the results.

3 Data from Participants at the Start of the Project

3.1 Data from Participants at the Start of the Project

[This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]

4 Data from Participants at the End of the Project

4.1 Data from Participants at the End of the Project

[This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]

5 Conclusions

[This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]

6 Annex 1

Version 1.1 of the report has following amendments due to PR1 revision:

- Added text to section 1: [This summary section is a placeholder for the final report to be delivered at the end of the project. This comment will be removed and replaced with the summary text.]
- Added text to section 3: [This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]
- Added text to section 4: [This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]
- Added text to section 5: [This section is a placeholder for the final report to be drafted as the implementation proceeds during the project and delivered at the end of the project. This comment will be removed and replaced with the actual text.]

7 ACRONYMS AND ABBREVIATION

CRA — Cyber Resilience Act
ENISA — European Union Agency for Cybersecurity
EU — European Union
GDPR — General Data Protection Regulation
FOSS — Free and Open-Source Software
AI — Artificial Intelligence
IPR — Intellectual Property Rights
KPI — Key Performance Indicator
PII — Personally Identifiable Information
RBAC — Role-Based Access Control
SBOM — Software Bill of Materials
SAST — Static Application Security Testing
DAST — Dynamic Application Security Testing
MFA — Multi-Factor Authentication
SOC — Security Operations Centre
IR — Incident Response
API — Application Programming Interface
TLS — Transport Layer Security
ISO — International Organization for Standardization
IEC — International Electrotechnical Commission
ETSI — European Telecommunications Standards Institute
SUS — System Usability Scale
TRL — Technology Readiness Level
WP — Work Package
DoA — Description of Action

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