Applicant: Painter, Lilian Organisation: Wildlife Conservation Society

Funding Sought: £54,797.00 Funding Awarded: £54,797.00

## CV19RR\1046

#### Strengthening tourism to combat COVID-related threats to Bolivia's indigenous territories

Protected areas and T'simane Mosetene, Uchupiamona and Tacana indigenous territories face increased threats as a result of COVID-19, which has led to a reduction in local employment linked to tourism, and reduced demand for local products. We propose to update the Strategic Plan for Tourism for the destination to include an analysis of post-COVID tourism trends, develop local capacity to apply biosecurity protocols and promote national tourism in preparation for carnival and Easter holidays.

#### **Section 1 - Contact Details**

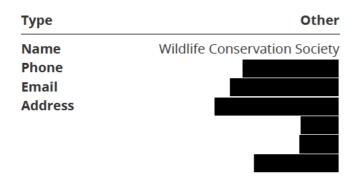
#### PRIMARY APPLICANT DETAILS



#### **OTHER DETAILS**



#### **GMS ORGANISATION**



## Section 2 - Project Title & Previous Applications

#### Q3. Project Title:

Strengthening tourism to combat COVID-related threats to Bolivia's indigenous territories

#### Q4. Existing project

Q4a. Does your organisation have an existing (or recently finished) project under either Darwin

#### Initiative, Darwin Plus or Illegal Wildlife Trade Challenge Fund?

Yes

#### If yes, please list the project reference and title of relevant projects (e.g. 25-001, DPLUS090, IWT099).

Reference of current/recent project: Title of current/recent project:	
Existing WCS projects:	Existing WCS projects:
27-013;	Conserving Myanmar's wetland biodiversity
26-013;	through sustainable rice standards; Conservation
26-021;	and poverty alleviation through sustainable
24-001;	ranching in Paraguay;
24-003;	Biodiversity conservation, vicuña health and local
24-011;	livelihoods in Apolobamba, Bolivia; Improving
23-014;	forest governance for Cross River gorillas and
23-015;	Nigerian farmers;
IWT084;	Conservation and poverty alleviation through
IWT080;	scalable agro-biodiversity practice in Laos; Wildlife-
IWT076;	friendly agroforestry and sustainable forest
IWT075;	management in Bolivian indigenous territories;
IWT073;	Improving livestock management for economic-
IWT069;	environmental stability in Mesoamerica's
IWT068;	Mosquitia;
IWT054;	Guinea pigs as guinea pigs, reducing bushmeat
IWT053;	hunting while improving communities wellbeing;
IWT040;	Tackling Illegal Wildlife Trade in the Nigeria-
IWT038	Cameroon Green Corridor;
	Expanding Local Intelligence Networks to Combat
	Jaguar IWT in Boliviaetc.

#### Q4b. Is this proposal directly relevant to one of the projects listed above?

Yes

#### If yes, please list the relevant project reference and title.

Wildlife-friendly agroforestry and sustainable forest management in Bolivian indigenous territories(24-011)

## **Section 3 - Countries, Dates & Budget Summary**

# Q5. Which Fund's objectives will your project most directly address? (please only select one)

Darwin Initiative

#### Q6. Country(ies)

Which eligible country(ies) will your project be working in?

Country 1	Bolivia	Country 2	No Response
Country 3	No Response	Country 4	No Response

#### Do you require more fields?

No

#### Q7. Project dates

Start Date: End date:
01 January 2021 31 March 2021

#### **Q8. Budget summary**

Darwin/IWT Funding Request Total request 2020/21:

54,797.00

Please note all spending <u>must</u> fall between 1st January 2021 - 31st March 2021

Q8a. If any matched funding arrangements are proposed, please detail them here.

We propose a counterpart of the consisting of WCS staff time to support project implementation.

## **Section 4 - Project Outcome and Summary**

#### Q9. Outcome

#### What is the expected Outcome of this project?

Reactivation of ecotourism operations in the "Madidi: Rurrenabaque – Pampas" tourism destination reduces illegal resource extraction over 600,000 hectares of protected areas and Tacana, T'simane-Mosetene and Uchupiamona indigenous territories.

### Q10. Summary of project

Please provide a brief summary of your project, its aims, and the key activities you plan on undertaking. Please note that if you are successful, this wording may be used by Defra in communications e.g. as a short description of the project on GOV.UK.

Protected areas and T'simane Mosetene, Uchupiamona and Tacana indigenous territories face increased threats as a result of COVID-19, which has led to a reduction in local employment linked to tourism, and reduced demand for local products. We propose to update the Strategic Plan for Tourism for the destination to include an analysis of post-COVID tourism trends, develop local capacity to apply biosecurity protocols and promote national tourism in preparation for carnival and Easter holidays.

## **Q11. Project partners**

Please list all the partners involved (including the Lead Organisation) and provide a summary of their roles. Please upload letters, emails or other confirmation of support from any new partners.

Lead Organisation name:	Wildlife Conservation Society (WCS)
Other partners involved:	Rurrenabaque Madidi Pampas Tourism Council (CTDS); Tacana People´s Indigenous Council (CIPTA); Tsimane Mosetene Regional Council (CRTM).
Summary of roles and responsibilities in project:	WCS will: -Facilitate the update of the Strategic Plan for Tourism for the Rurrenabaque-Madidi-Pampas DestinationProvide technical guidance on establishing new tourism products, marketing the destination nationallyEvaluate project impacts on reducing threats over protected areas and indigenous lands, and their biodiversity, and local livelihoods, within the framework of its monitoring programsEnsure appropriate financial management, technical quality, timely completion, technical and reporting commitments.
	The CTDS will: -Convene meetings with restaurants, hotels, guides and other tourism sectorsRepresent the tourism sector in meetings with protected areas, indigenous territorial organizations or municipal governments to coordinate joint actionsApprove internal regulations to enforce implementation of best biosafety protocols by members.
	CIPTA and CRTM will: -Convene meetings with indigenous communitiesRepresent indigenous interests in meetings with protected areas, tourism operators and municipal governments to coordinate joint actionsApprove internal regulations to enforce implementation of best biosafety protocols by indigenous communities.
If you have not provided evidence of support from the Lead Organisation or partners above, please explain why:	N/A - we submit letters of support from the CTDS; Madidi and Pilon Lajas protected areas; Tacana and T´simane Mosetene Indigenous Organizations; and WCS.

Please provide a combined PDF of letters of support from the lead organisation and partner(s) as relevant.

- & Letters of support combined
- © 14:33:16
- pdf 2.16 MB

## **Section 6 - Project Staff**

#### Q12. Project staff

Please identify the core staff on this project, their role and what % of their time they will be working on the project. Further information on who should be classified as core staff can be found in the guidance. Please provide a 1 page CV for the proposed Project Leader and any co-Project Leader if relevant.

Name (First name, surname)	Role	% time on project	1 page CV attached?
Oscar Loayza	Project Leader	30	Checked
Mario González	Senior tourism specialist	30	Unchecked
Carlos Espinoza	Social and natural resources management specialist	30	
No Response	No Response	0	

#### Do you require more fields?

No

Please provide 1 page CVs for the proposed Project Leader and any co-Project Leader listed above as a combined PDF.

Ensure the file is named clearly, consistent with the named individual and role above.

- **i** 02/11/2020
- ① 14:34:23
- pdf 72.06 KB

## Section 7 - Problem, Method and Change Expected

## Q13. Problem the project is trying to address

Please describe the problem your project is trying to address in terms of Covid-19 and its impact on biodiversity or IWT and sustainable livelihoods. For example, what are the drivers of loss of biodiversity

that the project will attempt to address? Why are they relevant, for whom? How did you identify these problems? Please cite the evidence you are using to support your assessment of the problem (references can be listed in an additional attached PDF document).

Biodiversity and local livelihoods in the Rurrenabaque are threatened by forest loss due to illegal agricultural clearing and settlements, timber extraction, and gold mining. This degradation negatively impacts community livelihoods, which depend on forest resources and are therefore particularly vulnerable to climate change. These threats are increasing as a result of the COVID-19 global pandemic and its impact on employment and markets linked to tourism, reducing opportunity for alternative income and leading some local people to accept the presence of illegal extractive activities on their land. The increased pressure from illegal mining has been denounced by the indigenous territorial organizations in the press since May 2020.

Tourism in the Rurrenabaque region, the third most important tourism destination in Bolivia, came to a standstill between March and September, representing a loss of 6-8 million USD to the region and affecting more than 800 direct jobs as well as all local producers of coffee, cacao, dairy, fish, meat, vegetables and fruit. Local demand for coffee and cacao in particular has suffered a decrement of 70%. The jatata palm managers (50% women) and essential oil and soap producers (100% women) in Pilon Lajas had no sales between March and August. The livelihoods of women have been particularly affected as many of these activities are women-led.

With Darwin funds, WCS supports indigenous efforts to maintain control over their ancestral lands by coupling improvements in control and vigilance of illegal encroachments with investments to support sustainable agroforestry. We propose to complement these interventions by working with the Council of the Madidi- Rurrenabaque-Pampas tourism destination to mitigate the impact of COVID-19 on tourism and thus reduce local participation in illegal resource extraction, to implement control and vigilance systems to protect their territorial lands, and to strengthen the marketing strategies for sustainable forest products supporting indigenous livelihoods.

## Q14. Methodology

**Describe the methods and approach you will use to achieve** your intended Outcome. **Provide information on:** 

- How you have analysed historical and existing initiatives and are building on or taking work already
  done into account in project design. Please cite evidence where appropriate.
- The rationale for carrying out this work and a justification of your proposed methodology.
- If relevant, how this project links to an ongoing Darwin/IWT project.
- How you will undertake the work (materials and methods).
- How you will manage the work (roles and responsibilities, project management tools etc.).

Projects should also consider how best they can address inequality, especially gender inequality, as per the existing guidance for each fund.

Please make sure you read the Guidance Notes, particularly Section 3, before answering this question.

The project takes into account increased encroachments and pressures on indigenous lands during the pandemic, in particular due to: illegal mining; 70% reductions in market demand for cacao and coffee (as reported by Chomateo); and 100% reduction of tourism revenue in the Rurrenabaque region between

March and September.

Within this context we propose an intervention focused on increasing national tourism in order to mitigate the reduction in international visitors and prepare for the high international tourism season in the boreal summer of 2021. National tourism is already increasing and has been identified for its potential to complement international visitors. Our theory of change is that by increasing national tourism we will partially revert the loss of employment in the region and develop capacity for bio-secure hosting of international tourists, thereby reducing the number of local people turning to illegal activities to replace their loss of income. By reverting the downturn in tourism we will also increase local demand for local products and services, including high quality coffee and cacao. Most senior managers of the tourism agencies and hotels are women, as are the producers of local produce, jatata palm, and essential oils and soaps. Therefore, the project has a strong gender focus and opportunity to support local women.

This project is relevant to the current project, 'Wildlife-friendly agroforestry and sustainable forest management in Bolivian indigenous territories (24-011)', and its outcome: Sustainable cacao and shade coffee production by indigenous communities in Bolivia results in increased protection of collective lands, strengthened livelihoods, reduced forest loss and increased avian biodiversity in agroforestry areas. We propose complementary outputs to reduce threats to at least 600,000 hectares of protected areas and indigenous territories due to the reactivation of tourism operations in Madidi, Pilón Lajas, Pampas del Yacuma and in areas linked to the ancestral lands of the Tacana, T'simane-Mosetene and Uchupiamona people.

This work will be implemented by WCS in coordination with a local facilitator of the Rurrenabaque Madidi Pampas Tourism Destination (CTDS), and supported by four consultancies aimed at: 1. Providing training on biosafety; 2. Certifying operations based on the Biosphere sustainable tourism standards; 3. Supporting the design of the endemic titi monkey tourism circuit; and 4. Developing communication materials to promote national tourism.

WCS will provide technical support to the CTDS to respond to the challenges of COVID-19 by reviewing the strategic plan, establishing new tourism products, marketing the destination to the national market and improving capacity for implementing biosafety protocols and thus achieving the project outcome. The CTDS is the inter-institutional coordination platform representing all state (5 municipal governments, and 2 protected areas of national importance), community (3 indigenous territorial organizations) and private stakeholders (ecotourism service providers).

## Q15. Change expected

Detail the expected changes this work will deliver. You should identify what will change and who will benefit a) in the short-term (i.e. during the life of the project) and b) in the long-term (after the project has ended). Please describe the changes for biodiversity/environment and for people in developing countries, and how they are linked. If you are proposing building on a current or past project, be clear how additional benefits will be delivered through this project.

When talking about people, please remember to give details of who will benefit and the number of beneficiaries expected. The number of communities is insufficient detail – number of households should be the largest unit used. If possible, indicate the number of women who will be impacted.

We expect to achieve the following changes in the short term:

The CTDS and its 11 members (5 municipalities, 2 national protected areas, 3 indigenous organizations and

1 private entity from the tourism sector) representing 69,322 people will have established a collective agreement to build resilience against COVID-19 in their strategic plan to guide ecotourism in the region, directly benefiting 800 people employed by tourism operators in the region and indirectly supporting 15,000 people whose livelihoods are linked to tourism in San Buenaventura, Rurrenabaque, Reyes and Santa Rosa municipalities.

50 tourism operators or service providers mitigate the impacts of reduced international tourism by increasing their capacity to employ biosecurity protocols and attract national tourism, whilst preparing for the return of international visitors in the boreal summer of 2021.

National and international tourists benefit from improved biosafety protocols and reduced COVID-19 infection risk.

We expect to achieve the following changes in the long-term:

600,000 hectares of protected areas and indigenous territories have reactivated their existing tourism operations and reduced illegal natural resource extraction activities, benefiting 8,000 Tacana, Lecos, T´simane Mosetene and Uchupiamonas indigenous people.

11 indigenous communities and 660 people living near ecotourism record a 60% recovery in national tourism from a 2019 baseline and a 20% increase in national tourism by December 2022.

130,000 hectares of habitat of two endangered endemic primates are safeguarded through a new tourism circuit.

Bird friendly coffee and native cacao producers recover 60% of their local markets, relative to a 2019 baseline.

## If necessary, please provide supporting documentation e.g. maps, diagrams, references etc., as a PDF using the File Upload below:

- Project map Madidi Tourism and Productive A ctivities
- **i** 02/11/2020
- ① 14:38:52
- pdf 884.42 KB

## **Section 8 - Aims, Objectives and Exit Strategy**

## Q16. Aims and objectives

## Clearly outline the aim and objectives of the project and how the achievement will be measured. Use SMART objectives if possible.

The aim of the project is to mitigate the impact on forests and rivers within indigenous lands threatened by increased illegal activities linked to reduced employment and income resulting from COVID-19 by supporting the recovery of Eco-tourism in the Rurrenabaque region.

We will achieve this through the following objectives:

- 1. By March 2021, Update the Strategic Plan for Tourism for the Rurrenabaque-Madidi-Pampas Destination to include an analysis of post-COVID tendencies of world tourism and national trends.
- 2. By February 2021, a new tourism circuit is established in habitat of the endemic titi monkeys.
- 3. By March 2021, 50 tourism operations and indigenous communities linked to tourism operations apply biosecurity protocols against COVID-19.
- 4. By February 2021, a marketing strategy to promote national tourism to the Rurrenabaque Madidi Pampas tourism destination is implemented.

#### Indicators:

Reduction of reports of illegal activities over 600,000 hectares of protected areas and indigenous lands dedicated to tourism operations.

New tourism circuit design over 440 ha of the 130,000 hectares of endemic titi monkey habitat

An updated Strategic Plan for Tourism for the Rurrenabaque- Madidi- Pampas Destination.

Agreements between municipal authorities, communities, private land owners and tourism operators for a new tourism circuit in the area of distribution of the endemic titi monkeys.

At least 11 indigenous communities of the Tacana (4), Leco (1), T'simanes-Mosetenes (5) and Uchupiamona (1) that are linked to areas of tourism operations have preventive tools to protect them from possible contamination by COVID-19.

At least 50 enterprises (including operators, hostels, hotels, restaurants, transporters and others) are able to apply biosecurity protocols against COVID-19, benefiting at least 500 people directly linked to tourism activity.

## Q17. Exit strategy

State how the project will reach a stable and sustainable end point, and explain how the outcomes will be sustained, either through a continuation of activities, funding and support from other sources or because the activities will be mainstreamed in to "business as usual".

The project 's exit strategy is safeguarded by the alliance with the CTDS. The proposed activities empower the CTDS from the beginning to develop the skills and tools to continue with efforts to reactivate ecotourism operations in the region to reduce threats over indigenous lands. These efforts will consist of leading an inter-institutional alliance to implement the Strategic Plan for the Destination, and as such mainstream project activities into "business as usual". In this regard, the CTDS will continue implementation of the marketing strategy and supervise implementation of biosecurity protocols by tourism operations in the Rurrenabaque Madidi Pampas destination. The CTDS is comprised of indigenous territorial organizations, protected areas, municipal governments and local tourism businesses, and therefore is representative of the stakeholder base necessary to ensure the impact can be sustained beyond project duration. Because tourism is the principal source of employment and indirectly benefits most of the population in this region protected areas, indigenous lands and local municipal governments include this activity within their strategic plans. This has motivated them to work with local tourism operators to pool together resources to support sustainable tourism in the region through the CTDS.

## Q18. Budget

Provide a detailed breakdown of costs to be funded by the Darwin Initiative/Darwin Plus/IWT Challenge Fund in GBP.

See Finance for Darwin/IWT for which costs sit under which budget line.

Budget Line	Cost in £ (GBP)
Staff costs	
Consultancy costs	
Overhead costs	
Travel and subsistence	
Operating costs	
Capital equipment*	
Other costs	
Total (Must be less than or equal to £60,000)	54,797.00
*If you are proposing to purchase any capital items over £1,000 please detail these here and provide justification below	N/A

## Q19. Financial Risk Management

This question considers the financial risks to the project. Explain how you have considered the risks and threats that may be relevant to the successful financial delivery of this project. This includes risks such as fraud or bribery, but may also include the risk of fluctuating foreign exchange and internal financial processes such as storage of financial data.

WCS has a system of procedures and controls to ensure segregation of duties between those who request supplies/services, and those approving, ordering, receiving or making payments. These controls are documented in WCS's Financial and Administrative Policies and Procedures Manual. WCS Bolivia also keeps financial records in an accounting system, maintains physical copies of all receipts, and has had clear audits for 20 years. WCS is committed to fair, open and ethical practices in obtaining the goods and services required for its operations as documented in the Procurement Policy, Travel Expense and Refunds Policy and Export Compliance Policy. WCS has a Conflict of Interest Policy which prohibits contract for goods and services with its employees, its trustees or firms with which any employee or individual trustee has a

material interest. In addition, no employee or trustee may participate in the selection, award or administration of a contract if he or she has an actual or apparent conflict of interest. Risks of foreign exchange fluctuations from pounds to dollars are not considered important due to the short duration of the project; funds will be protected from devaluation of the boliviano by limiting conversions from USD to Bs. to once every month.

#### **Q20.** Capital items

If you plan to purchase capital items with Darwin/IWT funding, please indicate what you anticipate will happen to the items following project end. If you are requesting more than 10% capital costs, please provide your justification here.

We propose to buy a printer and a laptop computer for use by the CTDS. We expect these two items to have a longer life than the project and they will therefore be donated to the CTDS to allow them to continue promoting best practices in local tourism initiatives in the region.

### Q21. Value for Money

Please describe why you consider your application to be good value for money including justification of why the measures you will adopt will secure value for money.

We propose a budget of £ with a counterpart from WCS. However, tourism in this region provides jobs for 800 people directly, including 300 indigenous people from 11 communities, and generates 6 to 8 million USD a year. It also complements investments to support 7096 indigenous people whose livelihoods depend on collective lands, as well as 271 agroforestry beneficiaries. We therefore consider that the project benefits vastly outweigh the costs and provide good value for money.

## **Section 10 - Ethics and Safeguarding**

## Q22. Ethics

Outline your approach to meeting Darwin/IWT's key principles for ethics as outlined in the guidance note. Additionally, are there any human rights and/or international humanitarian law risks in relation to your project? If there are, have you carried out an assessment of the impact of those risks, and of measures that may be taken in order to mitigate them?

WCS management systems ensure adherence to labour, finance, banking, and registration regulations specific to Bolivia, alongside US government regulations and donor compliance requirements. WCS respects legal obligations of employees and the institution to create an environment of safety and concern in the fulfilment of our mission, including access to medical care, insurance policies, and crisis management procedures. WCS has formal agreements with all indigenous territorial organizations found in the areas where we work in Bolivia, ensuring that we have partnerships which are respectful of their rights, and are enriched by indigenous knowledge on biodiversity, resource management, and poverty alleviation challenges.

#### Q23. Safeguarding

Projects funded through the Darwin Initiative/IWT Challenge Fund must fully protect vulnerable people

all of the time, wherever they work. In order to provide assurance of this, projects are required to have appropriate safeguarding policies in place. The award Terms and Conditions set out clear requirements on safeguarding. Please confirm you have read and understand these and that you comply with them all.

Checked

## **Section 11 - Key Milestones**

# Q24. Provide an overview of your proposed project, outlining key milestones.

N.B. This should cover the period of your requested project only and the start/end dates should match with those provided in Question 7.

Date	Key Milestone
01 January 2021	START
31 January 2021	At least one course on biosafety protocols with 50 tourism services providers
31 January 2021	At least one communication material to promote national tourism transmitted in the principal urban centers of Bolivia
31 January 2021	Biosafety protocols developed for indigenous communities involved in tourism operations
28 February 2021	At least a second course on biosafety protocols with 50 tourism services providers
28 February 2021	At least a second communication material to promote national tourism transmitted in the principal urban centers of Bolivia
28 February 2021	Draft update of the Tourism Strategic Plan
30 March 2021	At least a third course on biosafety protocols with 50 tourism services providers

30 March 2021	At least a third communication material to promote national tourism transmitted in the principal urban centers of Bolivia
30 March 2021	Final design of new tourism circuits
30 March 2021	Update of the Tourism Strategic Plan presented and approved by the CTDS
30 March 2021	Technical and Financial Report submitted
31 March 2021	FINISH

#### **Section 12 - Certification**

## **Q25. FCDO notifications**

Please check the box if you think that there are sensitivities that the Foreign, Commonwealth and Development Office will need to be aware of should they want to publicise the project's success in the Darwin/IWT competition in the host country.

Unchecked

Please indicate whether you have contacted your Foreign Ministry or the local embassy or High Commission (or equivalent) directly to discuss security issues (see Guidance Notes) and attach details of any advice you have received from them.

• Yes (no written advice)

## **Q26. Certification**

#### On behalf of the

Company

of

Wildlife Conservation Society

#### I apply for a grant of

£54,797.00

I certify that, to the best of our knowledge and belief, the statements made by us in this application are true and the information provided is correct. I am aware that this application form will form the basis of the project schedule should this application be successful.

(This form should be signed by an individual authorised by the applicant institution to submit applications and sign contracts on their behalf.)

• I have enclosed a CV for the Project Leader/co-PL and letters or confirmation of support (uploaded at appropriate points in application)

Checked

Name	Lilian Painter
Position in the organisation	WCS Bolivia Country Director, and Senior Regional Governance Specialist of the Andes Program
Signature (please upload e-signature)	<ul> <li>♣ Lilian Painter</li> <li>★ 02/11/2020</li> <li>★ 14:51:13</li> <li>♠ pdf 373.9 KB</li> </ul>
Date	02 November 2020

#### **Section 13 - Submission Checklist**

#### **Checklist for submission**

	Check
I have read the Guidance, including the "Guidance Notes for Applicants" and "Finance for Darwin and IWT Challenge Fund".	Checked
I have read, and can meet, the current Terms and Conditions for the relevant fund.	Checked
I have provided actual start and end dates for my project.	Checked
I have provided my budget in GBP.	Checked
The application has been signed by a suitably authorised individual (clear electronic or scanned signatures are acceptable).	Checked
(If copying and pasting into Flexi-Grant) I have checked that all my responses have been successfully copied into the online application form.	Checked
I have included a 1 page CV for the Project Leader (and co-Project Leader if relevant).	Checked
I have included a letter or electronic confirmation of support from the lead organisation and main partner organisation(s) identified at Question 11, or an explanation of why not.	Checked

I have checked the website on GOV.UK immediately prior to submission to ensure there are no late updates.

Checked

Checked

Checked

#### Data protection and use of personal data

Information supplied in this application form, including personal data, will be used by Defra as set out in the latest copy of the Privacy Notice for Darwin, Darwin Plus and the Illegal Wildlife Trade Challenge Fund available <a href="here">here</a>. This Privacy Notice must be provided to all individuals whose personal data is supplied in the application form. Some information may be used when publicising the Darwin Initiative including project details (usually title, lead organisation, location, and total grant value) on the GOV.UK and other websites.

Information relating to the project or its results may also be released on request, including under the 2004 Environmental Information Regulations and the Freedom of Information Act 2000. However, Defra will not permit any unwarranted breach of confidentiality nor will we act in contravention of our obligations under the General Data Protection Regulation (Regulation (EU) 2016/679).