

PRIVACY STATEMENT

‘Grant management and registration/validation of participants’

1. Introduction

The European institutions and bodies are committed to protecting and respecting your privacy in compliance with Regulation 2018/1725 (hereinafter referred to as ‘the Regulation’).

One of your rights under this Regulation is that you must be informed when your personal data - also known as personal information - is processed (collected, used, stored) by any EU organisation. You also have the right to know the details and purpose of that processing.

On these pages you will find information about the processing of personal data in the context of "Selection of proposals and management of grants" by EU institutions and bodies acting as Joint Controllers. The evaluation of proposals, the management of funded actions as well as the design, monitoring and evaluation of Research and Innovation Programmes and other EU Programmes and Initiatives by the EU institutions and bodies requires the processing of personal data in compliance with the Regulation.

Contact information for each Joint Controller in line with their respective programme(s) of competence relating to the collection and further processing of personal data is provided in section 8 (see Annex ‘[Contact information list](#)’).

References made to the grants in this document apply by analogy to the prizes, unless otherwise indicated.

2. Whose personal data do we process?

This privacy statement concerns the following categories of data subjects:

- Concerned staff of Applicants: the legal entities that apply for funding through the submission of proposals for grants or prizes.
- Concerned staff of Beneficiaries: the successful Applicants, i.e. participants in funded projects.
- Crew of audiovisual productions (for the Media sub-Programme managed by EACEA).
- Other third parties such as participants in events organised by the beneficiaries (EACEA).
- For Participant Register and Participant Identification Code (PIC) central registration and validation purposes: (i) natural persons who are participants to EU tenders / grants / prizes; or (ii) natural persons who represent or act in a certain role on behalf of the legal entities participant[-s/-ing] to EU tenders / grants / prizes.

This includes, for instance, Principal Investigators, Fellows, staff of Applicants/Beneficiaries with attributed roles in the proposals/projects (Primary Coordinator Contacts/Supervisors, Coordinator Contacts, Participant Contacts, Task Manager, Team Members, self-registrants, prize winners, Legal Representatives (LRs), Legal Entity Appointed Representatives

(LEARs), account administrators, natural persons as participants in their personal capacity, etc. See full list of roles in the Terms and conditions of the Funding & Tenders Portal)¹.

The data is collected directly and indirectly from the data subjects. In compliance with the relevant Article of the Grant Agreement², the Applicant/Beneficiary who provides the personal data of their staff to the Joint Controller shall first provide them with this privacy statement.

3. Why do we process your data?

3.1. Purpose of the processing

Purposes of the processing: validation of legal existence & status and (in some cases) financial capacity assessment of recipients of EU funds, proposal evaluation, grant management and follow-up, dissemination and exploitation of research projects' results.

This includes:

- Evaluation of research proposals;
- Award of funding if the proposal is successful;
- Management of grant agreements, including the follow-up of the publications generated by the projects, prizes, patents, etc.;
- Communication activities and networking³, as per the rules of each call for proposals or contest for prizes;
- Design, monitoring and evaluation of Research and Innovation Programmes and other EU Programmes and Initiatives by the EU institutions and bodies;
- Legal entity validation: the verification that the entity exists as a legal entity and that its legal data is correct (legal form, address, etc.) and the verification of certain special legal statuses that are used in EU funding programmes;
- The assessment of financial capacity of applicants, candidates and tenderers - under certain circumstances and based on a risk assessment of the Authorising Officer.

Your personal data may also be processed for the purposes of the Early Detection and Exclusion System Database (EDES-Database) managed by the European Commission, in compliance with the Financial Regulation⁴. Information exchanged within the EDES is centralised in this database. The database contains information on economic operators that could represent a threat to the Union's financial interests, on economic operators who are in one of the exclusion situations listed in Article 136(1) of the Financial Regulation and on economic operators on which financial penalties are imposed (Article 138). The EDES foresees the right of the person concerned to be informed of the data stored in the database upon their request to the Commission. The information contained in the database is updated,

¹ Terms used by the Funding & Tenders Portal. Read more in the Online Manual.

² E.g. Article 39.2 of the Horizon 2020 MGA, or Article 23.2 of the CHAFEA MGA, etc.

³ For instance, networking among beneficiaries, as well as among fellows/researchers/staff members (including coordinators and supervisors) through the implementation of alumni services.

⁴ Regulation (EU, Euratom) no 2018/1046 of the European Parliament and of the Council of 18/07/2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2011, (EU) No 1301/2013 (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision N541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012

where appropriate, following a request for rectification or erasure or any modification of data. For more information, please visit:

http://ec.europa.eu/budget/explained/management/protecting/protect_en.cfm

3.2. On what legal ground(s) do we process your personal data?

Depending on each category the processing is necessary and lawful under:

- Article 5(1)(a) of the Regulation (processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body);
- Article 5(1)(b) of the Regulation (processing necessary for compliance with a legal obligation to which the controller is subject);
- Article 5(1)(c) of the Regulation (processing necessary for the performance of a contract to which the data subject is a party);
- Article 5(1)(d) of the Regulation (explicit consent of the data subject).

The consent could be provided through the signature of a declaration of agreement (kept by each Applicant/Beneficiary and provided to the Joint Controller if there is a need for verification), through an opt-in on the Funding & Tenders Portal or through any other means.

You may withdraw your consent at any time.

Cf. the '[List of processing operations requiring prior consent of the data subject](#)'.

4. Which data do we collect and process?

The following personal data are collected and processed:

4.1. Identification and contact data

Personal data is collected via the [Funding & Tenders Portal](#) (F&T Portal).⁵

'[List of identification data](#)' collected via the [Funding & Tenders Portal](#).

General remarks of the Controllers:

- Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may be received only inasmuch as these data appear spontaneously in the CV provided by the data subjects. Those data are not processed during the management of the call or the execution of the agreement, since they are not pertinent (except for health data in MSCA Special Needs Lump sum call, where this has an effect on the funding);
- The address, city, country, telephone and fax numbers, bank account numbers as well as e-mail addresses provided in the proposal are usually the professional ones related to the legal entity submitting the application. Thus, as a general rule (with the exception of

⁵ EACEA is currently onboarding in the F&T Portal. Therefore, while it processes the same type of data, this may be done for some calls for proposals through other IT tools.

cases where the applicant is a natural person), private addresses or bank account numbers etc. are not processed⁶.

4.2. Proposals retained for possible funding and Grant management

For successful proposals, personal data are collected and further processed for the purposes of Grant Agreement preparation and management. For more details please refer to the '[List of Grant preparation and management data](#)'.

4.3. Marie Skłodowska-Curie Actions (MSCA)

Within the scope of Marie Skłodowska-Curie Actions (MSCA), the following personal data are collected and further processed concerning the research Fellows/Recruited Researchers/Seconded Staff Members:

- Identification and contact data: family name, birth family name, first name, title, gender, location of origin, date of birth, nationality, address(es), phone number(s), e-mail, fax number(s);
- Data relating to education: university degree and date of award, doctorate expected before the deadline and expected date of award, doctorate and date of award, full time post-graduate research experience and number of months, other academic qualifications and date of award, data concerning employment period within the funded project (start and end dates);
- Other personal data: places of residence during the previous five years;
- Eligibility related data for Marie Skłodowska-Curie integration actions;
- Picture/photo (not mandatory, if provided by the Fellow).

Further health-related documentation, when needed in the context of MSCA Special Needs Lump Sum, may be requested.

4.4. ERC – Frontier Research Actions

Within the scope of the evaluation phase of ERC Frontier Research Actions, additional personal data are collected for Principal Investigators (PIs):

- Identification and contact data: family name, birth family name, first name(s), title, gender, country and town of birth, country of residence, location of origin, date of birth, nationality, address(es), phone number(s), e-mail, fax number(s);
- Academic and research record of the Principal Investigator;
- Copy of PhD document (for Starting and Consolidator Grants), data on any significant career breaks (for career stage extension) and data on children, military service and/or statutory service of the Principal Investigator (to justify career breaks);
- Health data (only upon unambiguous consent): medical certificates (for career stage extensions) of the Principal Investigator or a close family member;

⁶ For the purposes of the ERC actions, this exception applies to the Principal Investigator.

Further personal data may be processed concerning the scientific staff members of a project team for statistical studies, impact evaluation of the programme, or improvement of the administration of funding schemes. These data are:

- Identification and contact data: Last name, first name, gender, nationality, staff category, year of birth, affiliation and e-mail;
- Academic and research records.

4.5. EACEA

EACEA may process personal data of third parties i.e. data subjects other than the beneficiaries' staff in order e.g. to verify the number of participants in events organised by the beneficiaries. In that case information such as participants' lists to the events may be required.

For the Media sub-Programme, EACEA may have to process personal data relating to the crew of audiovisual productions (e.g. name and nationality).

4.6. Financial Controls and Audits

The detailed description of the processing operations relating to financial controls and external audit for Research projects are described in the notification [DPO-3852](#) of the Directorate-General for Research and Innovation, published in the register of the European Commission Data Protection Officer (<http://ec.europa.eu/dpo-register>). The privacy statements of the Controllers for external audit and control are published on the [Funding & Tenders Portal](#).

5. How long do we keep your data?

The Controllers only keep your personal data for the time necessary to fulfil the purposes described above of collection or further processing.

For each category of data subjects concerned, please find below the retention details in line with the applicable Commission Retention list:

- For beneficiaries receiving EU funding, personal data is retained for 10 years after the end of the year following closure of the action.
- Pursuant to Article 4(1)(e) of the Regulation, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of beneficiaries for scientific research and/or statistical purposes for up to 25 years⁷, unless you exercise your right to object under Article 23 of the Regulation;
- For unsuccessful applicants, personal data are retained for up to 5 years after the closure of the call for which the data have been collected or updated⁸. For calls with multiple cut-off dates, personal data are retained for up to 5 years after the date of the cut-off following the submission of the proposal. Pursuant to Article 4(1)(e) of the

⁷ Identification (title, name, surname or Researcher ID, when provided) and contact details (e-mail) of scientific staff of beneficiaries

⁸ For EACEA it is 5 years following adoption of the award decision.

Regulation, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of unsuccessful applicants for scientific research and/or statistical purposes for up to 25 years⁹, unless you exercise your right to object under Article 23 of the Regulation;

- In case updates are made to the personal data of legal entities' representatives, the data will be kept for 5 years after their last update.
- If an audit has started before the end of the above mentioned periods, EACEA keeps the personal data until the end of the audit.

Should you provide the Controller with an extract of your judicial records, it would not be kept for more than two years following the closure of the particular procedure.

In any case, personal data contained in supporting documents are deleted where possible when these data are no longer necessary for budgetary discharge control and audit purposes¹⁰
¹¹.

6. How do we protect and safeguard your data?

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Commission or of its contractors.

All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Commission's contractors are bound by specific contractual clauses and confidentiality clauses for processing operations of your data on behalf of the Commission, and by the confidentiality obligations deriving from the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the Controllers have put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of each processing operation.

Access rights and controls are secured via the EU Login granted to persons authorised to get access to specific documents (call management, grant management, etc.)

All stakeholders involved in the evaluation and granting process are reminded to use the personal data received only for the purposes for which they were transmitted and to not further process any irrelevant and excessive data received with the proposals.

⁹ Identification (title, name, surname or Researcher ID, when provided) of scientific staff of applicants

¹⁰ In the case of the ERCEA, in addition to the budgetary discharge control and audit purposes, it is also necessary to take into account the need to check for compliance with the ERC work programme provisions.

¹¹ In the case of EACEA, after the periods mentioned in point 5 have elapsed, the files containing personal data are sampled to be sent to the historical archives of the Commission for further conservation. The non-sampled files are destroyed.

7. Who has access to your data and to whom is it disclosed?

Access to your personal data is provided to authorised staff of the Controllers responsible for carrying out each processing operation based on the necessity and data minimisation principles. Such staff abide by statutory, and when required, additional confidentiality agreements.

For more information please refer to the '[List of recipients](#)'.

8. What are your rights and how can you exercise them?

You have the right to access your personal data, the right to rectify them, if necessary, and/or to restrict its processing or erase them, if applicable. You are also entitled to object to the processing of your personal data, where applicable.

If you would like to exercise your rights under the Regulation, if you have comments, questions or concerns, regarding the collection and use of your personal data, please feel free to contact the Controllers as explained in section 9 below.

You can at any time directly access or rectify your personal data in the F&T Portal online. You may also change your EU Login password which allows you to login to the system and update your personal information contained in your profile.

For more information please refer to the '[Detailed information regarding access to and review of your personal data](#)'.

You may contact the Data Protection Officer of the Controller and, if necessary, the European Data Protection Supervisor with regard to issues related to the processing of your personal data under the Regulation.

9. Contact information

If you have comments or questions, any concerns or a complaint regarding the collection and use of your personal data, please feel free to contact the Controllers by using the '[Contact information list](#)'.

Annexes:

- [List of identification data](#)
- [List of Grant preparation and management data](#)
- [List of processing operations requiring opt-in of the data subject](#)
- [List of recipients](#)
- [Detailed information \(regarding access to/review of your personal data\)](#)
- [Contact information list](#)

LIST OF IDENTIFICATION DATA
COLLECTED VIA THE FUNDING & TENDERS PORTAL

Annex to chapter 4.1 of the Privacy Statement on ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

The personal data collected and further processed via the Funding & Tenders Portal are identification data, contact data, and organisational data:

4.1.1 Of the “person in charge of the proposal” for each Applicant

- Identification data of the main contact person of applicants: last name, first name, title, gender (in the submission forms);
- Contact data: phone(s), email(s), fax, address (if different from organisation's address);
- Organisational data: data subject's position in the organisation, Department/Faculty/Institute/Laboratory/Company/Organisation name;
- If the proposal is successful, the "person in charge of the proposal" becomes for the coordinator the Primary Coordinator Contact (PCoCo) and for other applicants the Participant Contact (PaCo) of the project;
- In ERC grants and MSCA grants there are special contact person roles. In ERC calls the Principal Investigator receives the Primary Coordinator Contact role, while in MSCA-IF grants the Supervisor;
- Principal Investigator's Researcher ID type and number;
- His/her Researcher ID number¹ (optional).

4.1.2 Of other categories of staff

- For other contact persons: title, first name, last name, e-mail and phone (optional) may be requested;
- If the proposal is successful, these contact persons become for the coordinator the Coordinator Contacts (CoCos), who may nominate other Team members/Task managers and for the other applicants the Participant Contact(s) (PaCos) and may nominate further Team members/Task managers of the project. Contact persons with read-only rights during proposal submission become 'Team members' of the respective participant;
- For MSCA IF grants, if successful, this Researcher (Fellow) receives Coordinator contact rights. For ERC grants, the Coordinator Contact is the Main Host contact person if successful. From MSCA Special Needs Lump Sum (SNLS), the Coordinator receives the contact details of the researcher concerned;
- Identification data of Principal Investigators/Researchers (e.g. MSCA IF/ERC grants): last name, first name, title, gender, nationality(ies), country of residence, date of birth, country and city of birth, Researcher ID number¹ (optional) in addition to contact data as above;
- Identification data of recruited researchers (ITN and COFUND) / seconded staff members (RISE): last name, first name, title, gender, nationality(ies), last 5 countries of activity, date, country and city of birth, email address, if the researcher bears family charges, if he/she has an employment contract and if he/she is enrolled in a PhD program, and the

¹ The Researchers' IDs can be collected via the submission forms through two structured fields (for ORCID and Researcher IDs) and a free field for any other type of researcher and author ID.

Researcher ID number are stored in the “Researcher Declaration”. The Declaration also indicates the recruitment/secondment period and the working time commitment of the researcher;

- In the context of Complaints submitted in relation to MSCA, the last name and first name of the complainant might be revealed to the Coordinator only upon specific permission. See details in the proposal templates available from the call page or from the [Reference documents page of the Funding & Tenders Portal](#).
- Educational data necessary to decide the eligibility and/or experience necessary for the evaluations of the proposed action: most likely included in a free CV format or description of the profile of the persons who will be primarily responsible for carrying out the action; their most relevant publications/previous projects/activities; any personal information related to academic and professional qualifications, as well as any other information on technical capacity presented in response to the selection and award criteria announced with the call for proposals;
See Part B template of the standard proposals (e.g. RIA/IA/CSA in H2020):

4.1. Participants (applicants)

Please provide, for each participant, the following (if available):

- a description of the legal entity and its main tasks, with an explanation of how its profile matches the tasks in the proposal;
 - a curriculum vitae or description of the profile of the persons, including their gender, who will be primarily responsible for carrying out the proposed research and/or innovation activities;
 - a list of up to 5 relevant publications, and/or products, services (including widely-used datasets or software), or other achievements relevant to the call content;
 - a list of up to 5 relevant previous projects or activities, connected to the subject of this proposal;
 - a description of any significant infrastructure and/or any major items of technical equipment, relevant to the proposed work;
 - [any other supporting documents specified in the work programme for this call.]
- Personal information regarding (absence of) a conflict of interest for reasons involving family, emotional life, political or national affinity, economic or any other interest that may be incompatible with the objectives pursued through the EU programmes mentioned as legal basis for the processing; personal information about the absence of certain convictions such as for bankruptcy, professional misconduct, fraud or corruption (in the context of verifying that the applicant are not situations of exclusion described in the relevant articles of the EU Financial Regulation). Nevertheless at the stage of submission this information is indirectly deduced since the responsible for submitting the grant application only ‘ticks’ the relevant box of the application form.

4.1.3 Personal data entered into Participant Register

Personal data entered into participant profile (Participant Identification Code – the PIC) in Participant Register of the Funding and Tenders Portal for different profiles (such as Legal Representative (LR), Legal Entity Appointed Representative (LEAR), account administrator, self-registrant, natural persons as Participants in personal capacity):

- An ID-document presented for validation purposes (typically such ID-documents contain: name, photo, personal national identification number, date and place of birth, nationality,

civil status; but also: height, eye-colour, particular signs of appearance, address, profession, etc.)

- Data contained in LEAR appointment documents (LEAR appointment letter including LEAR roles and duties and the declaration of consent). This data contains: official name, position in the organisation, gender, address, telephone number, e-mail address, fax number, mobile phone number, signature(s).
- Data contained in LEAR nomination supporting documents. These documents vary depending on entity / Participant. This data contains typically, but is not limited to: first and last names of officers, position in the organisation, date and place of birth, appointment history, employment contracts, other contracts of the entity with third parties, company internal documents, etc.
 - o Data contained in the legal entity file. NB! This file contains personal data ONLY in case the Participant is a natural person. This data contains: legal name, business name, main and secondary registration number, place and date of registration, VAT number, address of the head office, phone number, e-mail address, signature and stamp of the entity.
 - o Data contained in the financial identification file. NB! This file contains personal data ONLY in case the Participant is a natural person. This data contains: account name, IBAN account number, BIC/SWIFT code, branch code, bank name, address of bank branch, account holder name, account holder's address, stamp of bank (representative), signature and bank account statement.
- Data contained in the financial capacity assessment documents. These documents vary depending on entity / Participant. The data contains typically, but is not limited to: first and last names of officers, position in the organisation, signature, etc. If the Participant is a natural person the data may contain: the natural person's tax declaration or other documents providing information on revenues and patrimony, liquidities available on the natural person's bank account, IBAN account number, BIC/SWIFT code, branch code, bank name, address of bank branch, account holder name, account holder's address.
- Data contained in the SME assessment documents. The data may contain: the number/value of shares or voting right held by natural persons or group of natural persons, proofs for joint action of natural persons (including proofs of family links).
- Other personal data, unsolicited by the EU. The uploaded supporting documents may also contain personal data of other persons not necessary for the participant registration and validation processing (e.g. names of people recorded in minutes of a meeting as Participants, etc), but this data is not purposefully collected and processed by the Controller. Such data will still be kept by the systems which indeed is a processing operation, therefore by this provision we do not commit on deleting the data, but on refraining from further processing it.

LIST OF GRANT PREPARATION AND MANAGEMENT DATA
COLLECTED FOR SUCCESSFUL PROPOSALS

Annex to chapter chapter 4.2 of the Privacy Statement on ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

In addition to the identification data listed in section 3.1 of the Data Protection Notice, further data are collected and further processed for the proposals which have been retained for funding (or to be included in the reserve list) and grant management:

- Personal data entered into participant profile (Participant Identification Code – the PIC) in [Participant Register](#) of the Funding and Tenders Portal:
 - an ID-document presented for validation purposes (typically such ID-documents contain: name, photo, personal national identification number, date and place of birth, nationality, civil status; but also: height, eye-colour, particular signs of appearance, address, profession, etc.)
 - Data contained in LEAR appointment documents (LEAR appointment letter including LEAR roles and duties and the declaration of consent). This data contains: official name, position in the organisation, gender, address, telephone number, e-mail address, fax number, mobile phone number, signature(s).
 - Data contained in LEAR nomination supporting documents. These documents vary depending on entity / Participant. This data contains typically, but is not limited to: first and last names of officers, position in the organisation, date and place of birth, appointment history, employment contracts, other contracts of the entity with third parties, company internal documents, etc.
 - Data contained in the [legal entity file](#). **NB!** This file contains personal data ONLY in case the Participant is a natural person. This data contains: legal name, business name, main and secondary registration number, place and date of registration, VAT number, address of the head office, phone number, e-mail address, signature and stamp of the entity.
 - Data contained in the [financial identification file](#). **NB!** This file contains personal data ONLY in case the Participant is a natural person. This data contains: account name, IBAN account number, BIC/SWIFT code, branch code, bank name, address of bank branch, account holder name, account holder’s address, stamp of bank (representative), signature and bank account statement.
 - Data contained in the financial capacity assessment documents. These documents vary depending on entity / Participant. The data contains typically, but is not limited to: first and last names of officers, position in the organisation, signature, etc. If the Participant is a natural person the data may contain: the natural person’s tax declaration or other documents providing information on revenues and patrimony, liquidities available on

the natural person's bank account, IBAN account number, BIC/SWIFT code, branch code, bank name, address of bank branch, account holder name, account holder's address.

- Data contained in the SME assessment documents. The data may contain: the number/value of shares or voting right held by natural persons or group of natural persons, proofs for joint action of natural persons (including proofs of family links).
- Other personal data, unsolicited by the EU. The uploaded supporting documents may also contain personal data of other persons not necessary for the participant registration and validation processing (e.g. names of people recorded in minutes of a meeting as Participants, etc), but this data is not purposefully collected and processed by the Controller. Such data will still be kept by the systems which indeed is a processing operation, therefore by this provision we do not commit on deleting the data, but on refraining from further processing it.
- Identification and contact data of the Primary coordinator contact (PCoCo) and any further contact persons with access to the project data (unless already registered), as defined in the identity and access management of the Funding and Tenders Portal, described in the [Online Manual](#);
Role management in the Funding & Tenders Portal is in the hands of the Applicants. Further contact persons can be added or removed according to the needs of the consortium/Applicant. For a complete list of roles see the [Online Manual](#);
- Financial data:
 - Bank account reference (IBAN and BIC codes)¹;
 - VAT number (where applicable);
- Cost related data²: cost statements, including personnel costs which reflect the total remuneration (including social security charges and other statutory costs³), travel costs per beneficiary; regularly there is no breakdown per individual requested. The failure of any beneficiary to provide such information would result in the rejection of the corresponding costs in accordance with Articles 6, 22, 42 and Chapter 6 of the Model Grant Agreement;
- Dissemination, training related information related to tasks performed in the frame of the project, provided e.g. via deliverables of the project;
- Other categories of data: in compliance with Article 225(3 and 4) of the Financial Regulation⁴ applicants shall give a declaration of honour that their legal entity, the

¹ Cf. notifications DPO-300 and DPO-372 of DG BUDG.

² In the case of audits, the auditors may collect further personal data such as salaries, pension contributions, health insurance, unemployment fund contributions. Cf. DG R&I notification for H2020 external audits.

³ However, in the case of audits, the auditors may collect further personal data such as salaries, pension contributions, health insurance, unemployment fund contributions. Cf. DG R&I notification DPO-3398.

⁴ Regulation (EU, Euratom) no 2018/1046 of the European Parliament and of the Council of 18/07/2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2011, (EU) No 1301/2013 (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 316/2013, (EU) No

person representing them, member of their staff (according to the specific provisions of the call) is not in one of the exclusion situations referred to in Articles 136(1) and 141(1) of the Financial Regulation;

- Further documentation may be requested in the framework of the ethics screening/review/monitoring of actions, including (indicatively): training certificates; personal licences and/or licences of the action (e.g. for experiments with animals); authorisations from the local/national competent authority/body (e.g. for processing of personal data in relation to human bio samples); permissions for secondary use of personal data;
- If necessary, further documentation may be requested in the framework of MSCA Special Needs Lump Sum (SNLS): health-related certificates, additional information on the disability for which the grant is requested;
- If necessary, further documentation may be requested to treat complaints submitted in relation to MSCA: employment contracts, additional information on the issues of complaint.
- Supporting documents signed between producers, distributors and sales agents for the Media subprogramme.

LIST OF PROCESSING OPERATIONS REQUIRING PRIOR CONSENT OF THE DATA SUBJECT

Annex to chapter 3.2 of the Privacy Statement on ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

ONLY FURTHER TO THE UNAMBIGUOUS CONSENT OF THE DATA SUBJECT, the following processing operations may be implemented:

3.2.1 Special categories of data

With the exception of cases where the Joint Controller deems it necessary to acquire the evidence referred to in Article 137 of the Financial Regulation¹ (from the successful applicants), no special categories of data, as defined in Article 10 of the Regulation N° (EU) 2018/1725, are collected or processed on request of the Joint-Controller in the context of submission of proposals and their evaluation.

The data mentioned above may relate to offences or criminal convictions that are likely to be included within documents providing evidence with regards to the content of the relevant declarations.

Nevertheless, data subjects are free to provide voluntary health-related data for obtaining additional reimbursement due to special needs and possible additional costs. This may be justified in terms of Article 10(2)(a) of Regulation No (EU) 2018/1725 on condition that these personal data are submitted on a voluntary basis by the data subject.

In particular, health-related documentation, when needed in the context of MSCA Special Needs Lump Sum, may be requested.

3.2.2 Publication of personal data

3.2.2.1 Publication on the Internet

The following personal data of any staff of any Applicant or Beneficiary may be published on the Internet or disseminated by any other means for communication, dissemination, exploitation and networking purposes:

- Identification and contact data²: Last name, first name, title, gender, name of organisation he/ she represents (if provided together with

¹ Regulation (EU, Euratom) no 2018/1046 of the European Parliament and of the Council of 18/07/2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2011, (EU) No 1301/2013 (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision N541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012

² For instance of the Legal Entity Appointed Representative – LEAR - of each Beneficiary, including the Coordinator of the action.

Department/Faculty/Institute/Laboratory information), phone number(s), email, fax, address if different from organisation's address, age (for statistical and communication purposes), nationality (for statistical and communication purposes, e.g. analysis of the mobility of researchers);

- Other: professional contact details, education and work experience (short curriculum vitae), picture.

3.2.2.2 Partner(s) Search function on the Funding & Tenders Portal

For any data subject, based on the information already collected at the stages described in sections 4.1 (identification data when submitting a proposal), 4.2 (grant preparation data for successful proposals), 4.3 (MSCA specificities) and/or 4.4 (ERCEA's specificities), a “Person profile” is created³. By default, this profile is accessible only to the user owning it, who is able to enrich his/her profile with additional information⁴.

Finally, the data subject is offered the possibility to agree explicitly⁵ to the searchability and/or publication of (parts) of his/her profile. The data subject can withdraw his/her agreement at any moment.

3.2.2.3 Anonymous Contact function on the Funding & Tenders Portal

Any user may contact the project contacts (Coordinator/Participant contacts) or the LEAR/Account administrator of beneficiaries anonymously (e.g. via the project list given in the Organisation profile linked to the Partner search function). The name or any contact details of project contacts are not disclosed to the sender. The e-mail and name, as provided in the EU login of the sender of the message, will be disclosed to the recipient(s).

The data subjects who have agreed to the searchability and/or publication indicated above can decide, through an implicit opt-in⁶, to be part of an Anonymous Contact function implemented on the F&T Portal. This function allows any user to send a message to the data subject/profile owner, without disclosing the identity and contact data of the latter.

3.2.3 Disclosure of personal data

The consent of data subjects is also required for the disclosure of some of their personal data to certain categories of recipients, as detailed the '[List of recipients](#)' published in the [Legal Notice of the F&T Portal](#).

³ Containing basic identification data (name, first name, e-mail, researcher ID (if available), and the data subject's links to projects and organisations.

⁴ For instance intention to cooperate on a proposal for a future call/topic; provision of a researcher ID if not yet provided at the proposal submission or grant preparation stages.

⁵ Box to be ticked by the data subject.

⁶ Ticked box that can be unticked by the data subject.

LIST OF RECIPIENTS

Who has access to your personal data and to whom it is disclosed Annex to section 7 of the Privacy Statement ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

7.1. EU institutions, bodies and agencies

By default: Access to your personal data is provided to authorised staff of EU institutions, bodies and agencies for the purposes indicated in chapter 3 of the Privacy Statement, in compliance with the principles of “necessity” and “data minimisation”:

In addition, data may be disclosed to:

- Research Executive Agency: personal data submitted by the applicants for the validation of their legal entities and financial capacity;
- EU Delegations for some programs of EACEA: they receive copies of the applications for eligibility check and assessment of the relevance;
- Programme committee and European Parliament (EACEA): whether comitology or information procedure is applied to a selection, the members of the programme committee (representatives of the member states) receive information on selected proposals that may contain limited personal data. In addition, Commission staff prepares and participates in the meetings. Information on selected proposals is provided in parallel to the European Parliament;
- Upon request and for the purposes of legal proceedings: Access to your personal data is provided to authorised staff of the EU Courts (e.g. the General Court and the Court of Justice) or national Courts as well as the lawyers and the agents of the parties;
- The competent Appointing Authority in case of a request or a complaint lodged under Article 90 of the Staff Regulations;
- OLAF in case of an investigation conducted in application of Regulation (EC) No 883/2013;
- The Internal Audit Service of the Commission within the scope of the tasks entrusted by article 118 of the Financial Regulation and by article 49 of the Regulation (EC) No 1653/2004;
- The Court of Auditors within the tasks entrusted to it by Article 287 of the Treaty on the Functioning of the European Union and Article 20(5) of Regulation (EC) No 58/2003;
- The European Ombudsman within the scope of the tasks entrusted to it by Article 228 of the Treaty on the Functioning of the European Union;
- The European Data Protection supervisor in accordance with Article 58 of the Regulation.

7.2. Recipients other than EU institutions, bodies and agencies

7.2.1. Without the need to obtain your explicit consent, in compliance with the ‘necessity’ and ‘data minimisation’ principles:

- The Legal Entity Appointed Representatives (LEARs)¹, Account Administrators or Self-Registrants of the participating organisations included in your project proposal² if these organisations are located in the EU/EEA or third countries with an adequacy decision³;
- Independent experts, contractors and beneficiaries of actions who are working for or on behalf of and under the responsibility of the Joint Controllers and/or their services for the purposes of evaluation of proposals, monitoring of grants, communication activities, networking among beneficiaries and concerned staff⁴, as well as design, monitoring and evaluation of Research and Innovation Programmes and other EU Programmes and Initiatives⁵;
- Authorised persons of the Member States' ministries⁶ and Programme Committees members for purposes which fall within the scope of their tasks as defined in Article 9(2) and Annex IV of the Specific Programme;
- External auditors (for beneficiaries only);
- Authorised staff of industry and of scientific committees in the case of Joint Undertakings' operations;
- Members of the ERC Scientific Council;
- National Contact Points and Erasmus+ National Agencies: under some EACEA programmes National Contact Points (national offices/national agencies) receive copies of the proposals from their countries that may contain some limited personal data;
- National Agencies implementing at national level Erasmus+ Programme in the Programme countries;
- For Intra-Africa Academic Mobility Scheme (EACEA): the African Union Commission assist in the evaluation of applications and the monitoring of selected projects;
- For Intra-ACP Academic Mobility Scheme (EACEA): the ACP Secretariat, African Union Commission, CARIFORUM, Pacific Forum and South African Mission to the EU assist in the monitoring of the selected projects.

7.2.2. Only upon your explicit consent, in compliance with the ‘necessity’ and ‘data minimisation’ principles:

- The Legal Entity Appointed Representatives (LEARs)¹, Account administrators or Self-Registrants¹ of the participating organisations included in your project proposal if these organisations are located in third countries without an adequacy decision, i.e. which do not ensure an adequate level of protection of personal data as recognised by the European Commission decision³;

¹ Cf. Terms and conditions of the Funding and Tenders Portal:

<http://ec.europa.eu/research/participants/portal/desktop/en/support/tc/termsconditionsservice.html>

² If not, prior-consent is required (cf.6.2.2).

³ In the absence of an adequacy decision, we may provide access to your personal data subject to appropriate safeguards, such as standard data protection clauses adopted by the Commission. For more information please see http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm if no appropriate safeguards can be implemented, we will ask for your explicit consent before granting access to your personal data.

⁴ For instance, coordinators, fellows, researchers and other staff members.

⁵ With regard to ERCEA, this is applicable to ERC calls as of 2018.

⁶ With regards to the third health programme, member States and associated Countries’ ministries include the National Focal Points referred to in article 15 of regulation 282/2014 establishing a third Programme for the Union's action in the field of health (2014-2020).

- For ERC Frontier Research, upon consent of the Principal Investigator, a limited set of personal data may be disclosed to national/international funding authorities which run schemes to fund ERC applicants that score highly in the evaluation but which cannot be funded by the ERC due to its limited budget: full name of the Principal Investigator, non-confidential proposal title and abstract, proposal acronym, Host Institution;
- For purposes related to monitoring, study and evaluating implementation of ERC actions, the ERC may need that submitted proposals and their respective evaluation data from H2020 calls 2014-2017, upon consent of the Principal Investigator, be processed by Contractors, independent experts identified in Article 40 of the Rules for Participation, and/or beneficiaries of Coordination and Support Actions;
- For communication purposes, the ERCEA may publish information on the proposals recommended for funding as a result of the evaluation and only for applicants who have agreed to the publication of these data⁷;
- Public research funding bodies and other research organisations of EU/EEA countries as well as third countries associated to Horizon 2020 for which the Commission has not adopted an adequacy decision;
- Programme Committees members for purposes which are out of the scope of their tasks as defined in Article 9(2) and Annex IV of the Specific Programme;
- Funding bodies in EU/EEA countries and countries associated to H2020, with the aim of seeking national funding sources out of the scope of the Programmes and Initiatives managed by the Joint Controllers.
- Authorised persons⁸ in EU/EEA countries and third countries associated to Horizon 2020 and for which the Commission has adopted an adequacy decision.

7.3. Publication of your personal data online

The access to a limited subset of personal data is given to the public:

- For beneficiaries or prize winners, a limited set of data⁹ may be published on the CORDIS website/Europa/other dedicated Internet webpages or disseminated by any other means;
- In addition, reports and deliverables of projects not marked as "confidential" by the concerned beneficiaries will be published on CORDIS/Europa/other dedicated Internet webpages. The publication of any personal data contained in these documents must comply with the applicable EU and national law on data protection (cf. art 39.2 of the Model Grant Agreement);
- In accordance with Articles 37 and 38 of the Financial Regulation, certain information on recipients¹⁰ of EU funds are published annually on the Europa webpage ([Financial Transparency System](#)) and might also be published on the CORDIS website/other dedicated Internet webpage or disseminated by any other means,
- For the Media subprogramme managed by EACEA: the names of film directors are published in the website of EACEA;

⁷ This may include the names of PIs and applicant legal entities, the proposal title and acronym.

⁸ For instance National Contact Points (NCPs), Nationally Nominated Authorised e-CORDA Users.

⁹ Identity of Principal Investigators, Main Host institution contact (ERCEA Grants); Identity of the Researchers/Fellows (Marie Skłodowska-Curie actions), Supervisor; Identity of the administrative contacts of the beneficiaries of Horizon 2020 grants.

¹⁰ These provisions are not applicable for scholarships paid to natural persons.

- For Jean Monnet (Erasmus+) managed by EACEA: the contact details of the professors are published in the website of EACEA.

**DETAILED INFORMATION REGARDING ACCESS TO/REVIEW OF
YOUR PERSONAL DATA**

Annex to chapter 8 of the Privacy Statement on ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

8.1 Active phases

When you are in an active phase of proposal submission, negotiation or reporting, if you have "read and write" access to the application, you can modify or delete your contact data yourself by logging into the Funding & Tenders Portal and accessing your personalised services¹.

If you have "read-only" access, your hierarchy within the project (participant or coordinator) contact person(s) who have "read and write" rights can modify or delete your personal data.

For all personalised services, users have to create and manage their own EU login account. The EU Login account related information (e.g. name, e-mail) can only be modified by the owner of the account. The EU Login account can be deleted by the owner of the account.

8.1.1 Organisation registration in the [Participant Register](#) of the Funding and Tenders Portal

- Log in to the [Participant Register](#) of the Funding & Tenders Portal to view your personal data submitted during the registration;
- You can access and modify your personal data anytime unless the validation process has already started;
- If the validation is on-going, the personal data declared during the registration can also be modified at any point in time by accessing the organisation's account in the [Participant Register](#) of the Funding & Tenders Portal;
- If the validation has already been finalised, the Legal Entity Appointed Representative (LEAR) becomes the contact person for the PIC to access and review the personal data in the Participant Register portal on behalf of the participant.

8.1.2 Proposal preparation/application (in response to an open call)

- Applicants/contact persons of proposals can access the submission tool to modify, correct or delete any personal data before the end of the call deadline;

8.1.3 Grant Agreement preparation, management

- At the end of the evaluations, the legal entities whose proposals were approved for funding will be invited to start the "Grant Agreement preparation phase". During this

¹ For EACEA calls for proposals not on the Funding & Tenders Portal, the controller can be contacted at the email address indicated in the relevant call.

period, the data subjects can modify and/or delete their personal data (included in the proposal);

- After the Grant Agreement has been signed and during the implementation of the action: the Primary Coordinator contact of the action can be modified by the Project Officer (see Article 52 of the Horizon 2020 Model Grant Agreement on 'Communication between the Parties'), while all other access rights and roles can be managed in the Funding & Tenders Portal by the persons having a coordinator Contact/Participant Contact role. For FP7 projects the concerned Project Officer will initiate an amendment to the Grant Agreement or simply notify that internal records have been updated accordingly (i.e. information letter procedure).

8.2 Non-active phases

When the services are not in an active mode:

- Once the call deadline has passed, proposals are available on the “My Proposals” section of the [Funding and Tenders Portal](#) but cannot accept any further additions or corrections of the personal data submitted in the proposal; access rights management is available to proposal contacts in the My Proposals section.
- During the evaluation review procedure, modifying the information that has been submitted is not allowed;
- In case of concern, a request can be sent to the technical [helpdesk](#) of the Funding and Tenders Portal (<https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/helpdesks/contact-form>)¹;
- The Marie Skłodowska-Curie Fellowship Certificate form (http://ec.europa.eu/research/rea/index.cfm?pg=mc_certificates) allows fellows who have completed a research period within one of the FP7 or H2020 Marie Skłodowska-Curie actions to request a Marie Skłodowska-Curie Fellowship Certificate through their project contact person or the legal entity authorised representative (LEAR) or the scientist in charge at the coordinating institution.

8.3 Contacts of processors

For any matters relating to their rights under Articles 14-24 of Regulation (EU) No 2018/1725, and in addition to the Joint Controller email provided in section 12 of the notification, data subjects can contact the following processors directly at:

- The Validation Service for any question concerning the legal entity registration and management via the messaging area of the Beneficiary Register in the Funding & Tenders Portal;
- The contact information given in the Call for any question on Proposal submission;
- The designated Project Officer/Financial Officer or their back-ups (for running grants).

CONTACT INFORMATION LIST

Annex to chapters 1 and 9 of the Privacy Statement on ‘Grant management and registration/validation of participants’ published on the Funding & Tenders Portal

You can contact the relevant Controller directly at:

H2020 Joint Controllers

- DG RTD Director-General: RTD-ASSISTANT-SECRETARIAT@ec.europa.eu;
- DG GROW Unit R1 Budget, Financial Management and Assurance: GROW-FINANCIAL-UNIT-PROCUREMENT-GRANT-MANAGEMENT@ec.europa.eu;
- DG CNECT Head of unit R5: CNECT-R5@ec.europa.eu;
- DG MOVE Head of unit MOVE B3: MOVE-B3-SECRETARIAT@ec.europa.eu;
- DG ENER: Head of unit ENER C2: ENER-C2-SECRETARIAT@ec.europa.eu;
- DG GROW Head of unit R1: GROW-R1@ec.europa.eu;
- DG DEFIS Head of unit A2: DEFIS-A2@ec.europa.eu;
- DG DEFIS Head of unit A3: DEFIS-A3@ec.europa.eu;
- DG HOME Director-General: Monique.Pariat@ec.europa.eu;
- DG EAC Head of Unit C2: EAC-UNITE-C2@ec.europa.eu;
- REA Director: Marc.Tachelet@ec.europa.eu;
- ERCEA Director: Waldemar.Kutt@ec.europa.eu;
- INEA Director: INEA@ec.europa.eu;
- EASME:
 - H2020 Entrepreneurship: EASME-COSME-DP@ec.europa.eu;
 - H2020 SME Head of Unit A.2: EASME-SME-HELPDESK@ec.europa.eu;
 - H2020 Energy Head of Unit B.1: EASME-Energy@ec.europa.eu;
 - H2020 Environment and Resources Head of Unit B.2: EASME-H2020-SC5-EXPERTS@ec.europa.eu;
- SHIFT2RAIL (S2R) Executive Director: Carlo.Borghini@s2r.europa.eu;
- BBI Executive Director: Philippe.Mengal@BBI.europa.eu;
- SESAR Administration Affairs: Procurement@sesarju.eu;
- ECSEL Executive Director: [Data-Protection@ecsel.europa.eu](mailto>Data-Protection@ecsel.europa.eu);
- CLEANSKY2 Executive Director: [Data-Protection@cleansky.eu](mailto>Data-Protection@cleansky.eu);
- IMI Executive Director: [Data-Protection@imi.europa.eu](mailto>Data-Protection@imi.europa.eu);
- FCH Executive Director: [Data-Protection@fch.europa.eu](mailto>Data-Protection@fch.europa.eu).

Controllers of other EU Programmes and Initiatives

- DG JUST: JUST-DIRECTOR-GENERAL@ec.europa.eu;
- DG ECHO unit B.3: ECHO-CP-TRAINING-EXERCISES@ec.europa.eu;
- CHAFAEA Director: Veronique.Wasbauer@ec.europa.eu; chafea@ec.europa.eu;
- EASME:
 - LIFE and CIP Eco-innovation Head of Unit B.3: EASME-LIFE-ENQUIRIES@ec.europa.eu;
 - EMFF Head of Unit A.3: EASME-EMFF-experts@ec.europa.eu;

- COSME Head of Unit A.1: EASME-COSME-DP@ec.europa.eu;
- EACEA: EACEA-dir@ec.europa.eu;
- Innovation Fund programme: INEA Director: INEA@ec.europa.eu;
- EDA Head of Unit "Preparatory Action": PreparatoryAction@eda.europa.eu.
- DG DEFIS:
 - European Defence Industrial Development Programme (EDIDP): DEFIS-A3@ec.europa.eu;
 - Preparatory Action for the Defence Research (PADR): DEFIS-A2@ec.europa.eu.

To contact their **Processors**:

- Use the contact information given in the call for any question on Proposal submission;
- Contact the designated Project Officer (or back-up, Financial Officer);
- Contact the functional mailbox indicated for each call of the ERC Frontier Research programme.

Controller of Participant Register for central participant registration and validation

- SEDIA Participant Validation Business Process Owner (BPO). The controller may be contacted via the functional mailbox: EU-CENTRAL-VALIDATION-SERVICES-DATA-PROTECTION@ec.europa.eu

Data Protection Officers (DPOs) of the Controllers:

- REA DPO: REA-DATA-PROTECTION-OFFICER@ec.europa.eu;
- INEA DPO (for Part III of the Horizon 2020 programme only): INEA-DPO@ec.europa.eu;
- CHAFAEA DPO: Chafea-data-protection@ec.europa.eu;
- ERCEA DPO: ERC-DATA-PROTECTION@ec.europa.eu;
- EACEA DPO (for ERASMUS+, CREATIVE EUROPE, EU AID VOLUNTEERS, EUROPE FOR CITIZENS, European Solidarity Corps, Intra Africa Academic Mobility Scheme): EACEA-data-protection@ec.europa.eu;
- EASME DPO: EASME-DPO@ec.europa.eu;
- IMI DPO: Data-Protection@imi.europa.eu;
- ECSEL DPO: Data-Protection@ecsel.europa.eu;
- SESAR DPO: sju.data-protection@sesarju.eu;
- FCH DPO: Data-Protection@fch.europa.eu;
- CLEANSKY DPO: Data-Protection@cleansky.eu;
- EDA DPO: dataprotection@eda.europa.eu;
- S2R DPO: Data-Protection@s2r.europa.eu;
- BBI DPO: Marta.Campos-Iturralde@BBI.europa.eu;
- OLAF DPO: OLAF-FMB-DPO@ec.europa.eu;
- EIT DPO: eit-dpo@eit.europa.eu
-

DPO of the European Commission

- European Commission Data Protection Officer (DPO): DATA-PROTECTION-OFFICER@ec.europa.eu.