

DPO-978.5 - RTD : Front-end notification: processing of data submitted by Experts and proposal Applicants in the context of Framework Programmes and other Programmes and Initiatives managed by the Research family's DGs (Research DGs) and related Executives Agencies (EAs) and Joint Undertakings (JUs).of Framework Programmes and other Programmes and Initiatives managed by the Directorate-General for Research and Innovation (DG RTD)

General information

Creation : 06/02/2006

Last updated : 03/10/2012

Registration : 19/12/2011

Status : Archived

Deleted : No

DG.Unit : RTD

Controller : SMITS Robert-Jan

Delegate :

DPC : BOURGEOIS Thierry, PENEVA Pavlina

Keywords :

Corporate : No

Language : English

Model : No Model

EDPS opinion (prior check) : No

Target Population : Beneficiaries, Citizens

DPC Notes :

Processing

1 . Name of the processing

Front-end notification: processing of data submitted by Experts and proposal Applicants in the context of Framework Programmes and other Programmes and Initiatives managed by the Research family's DGs (Research DGs) and related Executives Agencies (EAs) and Joint Undertakings (JUs).of Framework Programmes and other Programmes and Initiatives managed by the Directorate-General for Research and Innovation (DG RTD)

2 . Description

Collection and registration of the information (front-end) needed to manage Framework Programs and other Programmes and Initiatives, in accordance with the appropriate regulations, from the publishing of calls, initial collection of personal data from proposal Applicants, up to the point where collected data are sent to individual Research DGs for further processing operations (back-office) as projects until their closure.

These further specific (local) processing operations (including common ones) are covered under the so-called back-office notifications introduced by each Research DG and related EAs and JUs, and relate to personal data of Applicants and of Experts-reviewers.

The collection and registration of information includes:

- Call Publishing (*)
- External user support (Helpdesk Applicants, etc.) (*)
- Electronic Proposal Submission (*)
- Grant negotiation
- Periodic reports submission
- Management of user accounts and permissions
- Management of Codes & Calls reference data
- Publication of National Contact Point Names (NCP) on Cordis or Europa, depending on the programme (*)
- Organisation (Applicants) registration, verification, validation
- Experts registration

- Exchange of information between EU and Experts and Organisations (Applicants)
- For proposals retained for funding, publication on Cordis portal/Europa/other dedicated Internet website/paper (*) of:
 - Project summaries;
 - All the contact details of participants (e.g. phone, fax, email, postal address, location ...);
 - Any additional information provided by project coordinator, principal investigator or participants such as picture, age, nationality, short curriculum vitae, etc. of their staff, only further to the informed and unambiguous consent of the concerned data subjects (cf. last paragraph of section 15 a).
- Statistics, reporting and information relating the Front-Office processing of the research Framework Programmes and other Programmes and Initiatives
- Provision of Applicants to other European Institutions or Community Programmes/Bodies/Initiatives linked to the Research Framework Programmes or to other Programmes and Initiatives

The common processing operations include:

- Proposal evaluation (*)
- Proposal negotiation, ranking and decision (*)
- Organisation (Applicants) registration, verification, validation

(*): These steps include automated processing that is covered by a service contract managed by the EC (see point 8)

The data processed by DG RTD does not fall under the Article 27 of the Regulation 45/2001, and does not require prior checking by the European Data Protection Supervisor (EDPS).

Nevertheless, Article 27 may apply for the Ideas programme managed by the European Research Council Executive Agency (ERCEA), as well as for Indirect Actions managed by the Joint Research Centre (JRC), as stated in the corresponding back-office notifications. Therefore, the present front-end notification may have to be submitted to a prior checking by the EDPS.

Research Family's (front-office) and RTD (back-office) processing operations – V5.4

The main objective for the Directorate General is to manage the administration and funding of projects in research or other areas of its responsibility. The key processing operations involved are depicted in the diagram below. It is worth noting that processing operations for Research DG is split into common Front-office & Back-office (common to Research Family's DGs), and Local Back-office (mostly local to DG).

The lifecycle of processing starts with the preparation and publishing of Calls for proposals and for recruiting experts for evaluations or reviews. The **"Call publishing"** operation is done via a combination of standard office tools in the DGs and common tools in REA, and the Call is published on the Internet via the EC portal (both in Participant Portal and Cordis - www.cordis.lu), possibly soon only on the Participant Portal). Cordis also runs a general information dissemination service.

Organisations (single or in groups) prepare and submit proposals according to the conditions and topic of the Call for proposals. **"Proposal submission"** is done mostly electronically via the SEP service, available in the Participant Portal, managed by the Research Executive Agency (REA) from a business perspective, and by DIGIT from an IT perspective.

Organisations should submit their administrative and financial information via the Central Validation Team (CVT), a unique registration service run by REA. Upon registration, the organisations receive a participant identification code that can be used all subsequent administrative steps.

In preparation of the Calls in specific Framework Programmes (FP6 and later), experts can register for participation in evaluations or reviews via the EC Portal (**"Experts Registration"**). When a Call is published, lists of experts are prepared and approved for proposal evaluations via the **"Expert Management"** operation.

All proposals are registered for reception and when a Call is closed, the proposals are made available to the DG RTD Call Coordinator for **"Proposal Evaluation"** both in physical and electronic form via the Evaluation System Service (ESS) or from 2012 via the SEP service (cf. 3rd §). DG RTD then composes the panels of the approved experts to evaluate the proposals. The proposal evaluations are then planned and proposals are reviewed and ranked. The result is three lists of proposals with ranking:

1. Proposals that are put forward for funding approval;
2. Proposals kept in case changes occur to the first list; and,
3. Proposals which do not meet the requirements and they are rejected.

At this point, experts are paid for their participation in the evaluations via the **"Expert Management"** operation, while the selected proposals are reviewed and approved for funding by the Steering Committee of the concerned Specific Programme.

As soon as the proposals are approved for funding, Project Officers are assigned by the different Directorates in DG RTD and **"Proposal Negotiation"** operation begins. During this period, the final details of the proposal are settled, and a grant agreement is prepared via **"Grant Management"** operation. The latter operation also handles any amendments to the grant agreement. At this stage, the information provided via the unique

registration service is validated by the Commission's services.

When the grant agreement is accepted by all parties and signed, then the first payment can be made and the project proceeds to provide the deliverables agreed and get paid for the deliverables in the set time periods via the "**Grant Management**" operation, until the project is complete. During the project period, information is exchanged between the EU Project Officer and the organisation/company acting as the coordinator of the project within the consortium, including Grant Preparation Forms (GPF), contracts, and deliverables.

Another processing operation focuses on the continuous collection and validation of organisation data. "**Organisation management**" is common for all Research DGs for the latest framework program. "**Organisation registration**" is a processing operation which allows for organisations to pre-register and to get their participant identification code.

During all the above operations, information is kept in the data warehouse, so that "**DG Reporting**" and statistics can be produced. Reporting is produced as necessary for DG RTD operations and response to Parliamentary questions concerning funds, projects funded and socioeconomic issues. In addition, RTD carries its own internal auditing for ongoing projects, and there is processing with regards to audits carried out and the results obtained via "**Projects Auditing**". Also, structured information is collected via the "**Structured Deliverables**" processing for various other needs, like socioeconomic data.

Files can also be made available to other European institutions like the European Ombudsman, the Court of Auditors, the Court of Justice, the EDPS and also OLAF, in the framework of their power of investigations, as well as to Public research funding bodies from the Member States and the States associated to the Research Framework Programmes/other Programmes and Initiatives and/or to other Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives in case of a prior and unambiguous consent of the concerned data subjects.

[List of attachments](#)

- [Architecture V5.13.pdf](#)

3 . Processors

ESS (Electronic Service Support) and EPSS (Electronic Proposal Submission Service) until the full integration in SEP (Submission and Evaluation of Proposals) of the proposal submission (in 2011) and of the proposal evaluation (in 2012) services.

DIGIT, OPOCE, REA, EACI, and any other contractor working for, on behalf and under control of the Controller of this front-office notification.

[List of attachments](#)

- [Standard contractual clause on data protection.doc](#)

4 . Automated / Manual operations

All processing operations have an automated part. This point cover front-office automated processing operations and supporting IT systems (see attachment in point 7.) for applicants and participants. The front-office operations relating to experts are covered by the Research Executive Agency (REA), owner of the corresponding IT application, EMPP: "Expert Management in the Participant Portal".

The back-office processing operations and supporting systems are covered in the (local) back-office notifications of each Research family's DG.

The IT systems and supported front-office operations include:

- Cordis portal & Call Passport: "Call Publishing"
- Cordis portal: "External User Helpdesk"
- SEP: "Submission and Evaluation of Proposals"
- ESS: "Evaluation Service System" (probably until early-2013, then through SEP Evaluation)
- EPSS: "Electronic Proposals Submission System" (probably until mid-2012, then through SEP Submission)
- Cordis portal: "Publication of NCP names"
- CCM2: "Management of Codes and Calls reference data"
- SECUNDA: "Security Management" for local users
- OMM: "Organisation Management Module"
- PINOCCHIO/RIVET: "Evaluation Support" (for Research DGs)
- CaP: "Call Publishing"
- PDM/URF: "Organisations Registration/Verification/Validation"
- EFP: "Evaluation Facility Planning"
- NEF: "Negotiation Form"
- IAM: "Identity and Access Management"

- SESAM: management of accesses to SED, ESS, ARI, MCA
- FORCE (Form C)

Some of these services are embedded into the so-called "Participant Portal" (cf. attachments to question 7) Description of processing).

The scope of the front-office manual processing operations performed by EU personnel or contractors on their behalf is rather limited to certain areas mentioned below. Manually initiated transfer of data between systems is not considered as a processing operation and it is not mentioned here. The following processing operations are considered:

- Establishing and approving lists of Experts to be invited to evaluations;
- Providing help to Experts;
- Updating the CCM2 codes and calls reference data after a new call or RDG reorganisation;
- Publishing a call after input is received via the Call Passport system and CaP;
- Organisation of data management, including research and identification of duplicate entries, verification and validation for organisation legal status following adequate background research, and management of unique organisation (participant) ids;
- Keeping paper documents storage, e.g. on organisation legal status.

5 . Storage

The data is stored at the DG DIGIT data centre, physically under the control of DG DIGIT. The data can be transferred to local DG data centres operating under the same rules as the Digit data centre. It is stored in various computer readable formats, including on magnetic and optical storage media.

The proposal data may also be stored in paper form, and they are transferred to the appropriate DG for further processing.

Organisation validation data (legal of financial) may also be stored in paper form, but they remain under the control of the Research Executive Agency (REA).

6 . Comments

The responsibility for front-office operations and supporting IT systems is limited to the operations supported by RTD. Processing operations on data collected by front-office systems like Expert selection, and proposal evaluation and ranking is really performed by the Research DGs and related EAs and JUs, and are covered in their respective notifications for back-office processing operations (cf. question 4).

Purpose & legal basis

7 . Purposes

The purpose of the processing is:

- To manage the Commission's administration of projects submitted for funding or funded through the Research Framework Programmes;
- To manage the Research Framework Programmes as a whole, in accordance with the applicable regulation (s);
- To manage other (non-FP) Programmes funded by Research DGs and related EAs and JUs as a whole, in accordance with the applicable regulation(s).

8 . Legal basis and Lawfulness

The legal basis references may be updated with respect to legal acts to be adopted in relation to FP7 activities or other Programmes and Initiatives listed below.

Relating to front-end and common back-office processing operations:

- Decision No 1982/2006/EC of the European Parliament and of the Council of 18 December 2006 concerning the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007-2013)
- Regulation (EC) No 1906/2006 of the European Parliament and of the Council of 18 December 2006 laying down the rules for the participation of undertakings, research centres and universities in actions under the Seventh Framework Programme and for the dissemination of research results (2007-2013)
- Council Regulation (EURATOM) No 1908/2006 of 19 December 2006 laying down the rules for the participation of undertakings, research centres and universities in action under the seventh framework

programme of the European Atomic Energy Community and for the dissemination of research results (2007 to 2011)

- Council Regulation (EC) N° 1513/2002 of 27 June 2002 concerning the sixth Framework Programme of the European Community for research, technological development and demonstration activities, contributing to the creation of the European Research Area and to innovation (2002 to 2006)
 - Council regulation (EC, Euratom) N° 2002/668 of 3 June 2002 concerning the sixth Framework Programme of the European Atomic Energy Community (Euratom) for nuclear research and training activities, also contributing to the creation of the European Area (2002 to 2006)
 - Council Decision No 2006/970/EURATOM of 18 December 2006 concerning the Seventh Framework Programme of the European Atomic Energy Community (Euratom) for nuclear research and training activities (2007 to 2011)
 - Council Decision No 2006/971/EC of 19 December 2006 concerning the specific programme 'Cooperation' implementing the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007 to 2013)
 - Council Decision No 2006/972/EC of 19 December 2006 concerning the specific programme: 'Ideas' implementing the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007 to 2013)
 - Council Decision No 2006/973/EC of 19 December 2006 concerning the specific programme 'People' implementing the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007 to 2013)
 - Council Decision No 2006/974/EC of 19 December 2006 on the specific programme: 'Capacities' implementing the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007 to 2013)
 - Council Decision No 2006/976/Euratom of 19 December 2006 concerning the specific programme implementing the Seventh Framework Programme of the European Atomic Energy Community (Euratom) for nuclear research and training activities (2007 to 2011)
 - Decision No 2007/6262 on 14 December 2007 setting up the "Research Executive Agency" (REA) for the management of certain areas of the specific Community programmes People, Capacities and Cooperation in the field of research in application of Council Regulation N° 58/2000
 - Decision No 2008/37/EC of 14 December 2007 setting up the "European Research Council Executive Agency" (ERCEA) for the management of the specific Community programme "Ideas" in the field of frontier research in application of Council Regulation (EC) No 58/2003
 - Commission Decision No 2007/134/EC of 2 February 2007 establishing the European Research Council
 - **Commission Decision (2010/767/EU) of 9 December 2010 amending Decision C(2007) 2286 on the adoption of ERC Rules for the submission of proposals and the related evaluation, selection and award procedures for indirect actions under the Ideas Specific Programme of the Seventh Framework Programme (2007 to 2013)**
 - Commission Decision C(2007)2286 ERC rules for the submission of proposals and the related evaluation, selection and award procedures relevant to the Ideas Specific Programme, and its amendments
 - Article 169 initiatives (AAL, a joint research programme on "Ambient Assisted Living" in the "Cooperation" programme, and "EUROSTARS", a joint research programme for research performing SMEs and their partners in the "Capacities" programme)
 - Council Regulation (EC) No 71/2008 of 20th December 2007 setting up the Clean Sky Joint Undertaking
 - Council Regulation (EC) No 72/2008 of 20th December 2007 setting up the ENIAC Joint Undertaking
 - Council Regulation (EC) No 73/2008 of 20th December 2007 setting the joint undertaking for the implementation of the joint technology initiative on innovative medicines (IMI)
 - Council Regulation (EC) No 74/2008 of 20th December 2007 on the establishment of the 'ARTEMIS Joint Undertaking' to implement a Joint Technology Initiative in Embedded Computing Systems
 - Council Regulation (EC) No 521/2008 of 30 May 2008 setting up the Fuel Cells and Hydrogen Joint Undertaking (FCH)
 - Commission Decision 2006/291/EC, Euratom of 7 April 2006 on the re-use of Commission information
 - Various implementation regulations, and general regulations such as the Financial Regulations, the Guide to Financial Issues relating to FP7 Indirect Actions
- Relating to specific back-office processing operations handled by the concerned Research family's DGs and related EAs or JUs:
- Council Regulation (EC) No 1159/2005 of the European Parliament and of the Council of 6 July 2005 amending Council Regulation (EC) No 2236/95 laying down general rules for the granting of Community financial aid in the field of trans-European networks (OJ 2005/L191/16 of 22.07.2005)
 - Decision No 2113/2005/EC of the European Parliament and of the Council of 14 December 2005 amending Decision No 2256/2003/EC with a view to extension of the programme in 2006 for the dissemination of good

practices and monitoring of the take-up of information and communication technologies (ICTs)

- Decision No 854/2005/EC of the European Parliament and of the Council of 11 May 2005 establishing a multi annual Community Programme on promoting safer use of the Internet and new online technologies
- Decision No 1639/2006/EC of the European Parliament and of the Council of 24 October 2006 establishing a Competitiveness and Innovation Framework Programme (2007 to 2013)

The data processing is considered lawful, because it is necessary to:

- Meet requirements of the legal instruments mentioned above and ensure compliance of Commission with legal obligations as described in point (b) of article 5 of Regulation (EC) 45/2001;
- Perform a contract with the data subject (or take steps prior to entering into contract) as described in points (c) of article 5 of Regulation (EC) 45/2001.

For paper and Internet publication of pictures, age, nationality and short curriculum vitae of funded projects coordinators/leaders or principal investigators (successful applicants), the data subject has given his prior unambiguous consent. Either the data subject opted in at the time of the registration, or the data subject has signed a dedicated declaration agreement (cf. model attached to question 15) Information to data subjects).

The data processing is subject to prior approval of the data subject through two opt-in options at the time of the registration, as described in points (d) of article 5 and 6.(a) of article 9 of Regulation (EC) 45/2001.

Data subjects and Data Fields

9 . Data subjects

- Persons in organisations requesting or receiving funding through the Research Framework Programmes, or other Programmes and Initiatives, who are associated with the project(s) being funded;
- Experts applying or accepted for evaluation of proposals, as well as Experts applying or accepted for reviewing and monitoring of projects.

10 . Data fields / Category

For applicants, the data processed are:

- Last name, First name;
- Title, Gender;
- Nationality;
- Country where the applicant is legally resident at the time of the application;
- Department/Faculty/Institute/Laboratory name;
- Phone, Mobile phone;
- E-mail, Fax;
- Address, if different from organisation address;

And, if proposal is selected, then additional information is be collected:

- Bank account reference (IBAN and BIC codes);
- VAT no (where applicable);
- Costs statements, incl. personnel costs which reflect the total remuneration (incl. social security charges and other statutory costs) for FP7 Indirect Actions;

And the following information is published on Cordis portal/Europa/other dedicated Internet website/paper for all selected proposals/funded projects:

- Project summaries;
- All the contact details of participants (e.g. phone, fax, email, postal address, location, ...). And if the project coordinator/leader or principal investigator (PI) or any other person of any participant in a funded project agrees unambiguously, the following data may be published on paper and Internet for communication purposes (and further processed for statistics/study/programme evaluation purposes by contractors or beneficiaries of a Cooperation and Support Action):
- His/her short curriculum vitae (professional contact details, education and work experience);
- His/her nationality (for statistical and communication purposes - e.g. the analysis of the mobility of researchers-);
- His/her age (for statistical and communication purposes - e.g. the analysis of the participation of young/elder researchers-);
- His/her picture.

Further personal data may be collected and further processed concerning the scientific staff members of a

project team of a participant (i.e. the entity which signed the grant agreement), only upon unambiguous and informed consent of each concerned data subject, and for anonymous statistical studies, impact evaluation of the programme, or improvement of the funding schemes for researchers. The data that may be collected are the following ones:

- Last name, First name;
- Gender;
- Nationality;
- Staff category;
- Year of birth;
- Information on the latest higher education (degree, subject area, institution, year of award, country);
- Information on the latest post doctorate of professional station (activity, start and end dates, institution/organisation, country);
- Employment period within the funded project (start and end dates);
- Completion of the doctorate within the project (month, year, subject area).

The prior agreement of each concerned data subject shall be documented by the concerned participant (i.e. the entity which signed the grant agreement) according to the model of declaration annexed to the Service Specific Privacy Statement Applicants (cf. attachment to question 15)), to be filled in and signed by the data subject, and kept at disposal of the Controller by the participant for any possible verification.

Data relating to expert evaluators and reviewers:

- Username and password (and related questions);
- Type of expert (FP6 / FP7 / Evaluator-Reviewer / Non FP Expert – opt in);
- Personal details (Candidature reference, title, first name, current family name, previous family name, sex, date of birth, town of birth, country of birth, nationality, Passport n°, second nationality);
- Contact details (street name and number, town/city, country, postal code, PO Box, phone number 1+2, fax number 1+2, e-mail address 1+2, VAT number);
- Linguistic skills (Languages written, spoken and read);
- FP activities;
- Keywords (Expertise in keywords);
- Educational background (Diploma etc.);
- Experience (CV – URL, experience in Peer Review, Evaluation/Validation, Impact Assessment, Monitoring, Quality Assurance or Auditing);
- Employment history (Employment details including whether currently employed, current employer, and 5 previous employers);
- Interests (including the opt-in of question 44 - authorisation to Member States and States associated to FP to access the data submitted - and the opt-in of the first registration screen- authorising access to these data to other services of the Commission not involved in the administration of the FPs-);
- Publications;
- C.V. as attachment (file types: PDF, RTF, DOC, XLS, TXT);
- List of recommendations.

And, in case of appointment:

- Bank account reference (IBAN and BIC codes).

Experts can select whether or not (opt-in option) they authorise other Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives, and public research funding bodies from the Member States and the States associated to the Research Framework Programmes or to other Programmes and Initiatives to access the data submitted by them. This data is entered by experts themselves on the EMC or Participant Portal web site maintained by CORDIS under a service contract with the EC.

Rights of Data Subject

11 . Mandatory Information

Information to the Data Subjects as described in articles 11-12 under 'Information to be given to the Data subjects is provided in service specific privacy statements (SSPSs) displayed on websites that collect personal data.

- Applicants:

<http://ec.europa.eu/research/participants/portal/appmanager/participants/portal>

<https://www.epss-fp7.org/epss/welcome.jsp>

<https://webgate.ec.europa.eu/nef/frontoffice/project/'project number'/view>

- Experts: <https://cordis.europa.eu/emmp7/index.cfm?fuseaction=wel.welcome>.

Furthermore, applicants who have not opted-in at the time of their registration and who are granted may be offered to give their prior and unambiguous consent to the publication of their picture, nationality, age and short curriculum vitae (cf. section 17) at a later stage, through signature of a declaration of agreement.

List of attachments

- [SSPS Experts v3.9.doc](#)
- [SSPS Applicants v7.1.doc](#)

12 . Procedure to grant rights

Data subjects may contact the data Controller through the contact points indicated at the time they register or as indicated in the appointment letter/grant agreement to exercise their rights under articles 13-19, and are informed that any update of the process and related notification are published on the website of the commission's data protection officer (http://ec.europa.eu/dataprotectionofficer/register/index.cfm?TargetURL=D_REGISTER).

13 . Retention

For organisations retained for funding and grant agreements, personal data (on papers and registered in data bases) are kept as required by the Commission's Common Retention List (SEC(2007)970), i.e. 10 years after the end of the project. For organisations which are not granted, personal data are kept for 3 years and erased after this period.

14 . Time limit

Blocking or rectifying data falling could be done on request, as mentioned in the Specific Privacy Statements (see point 15).

Regarding erasing Proposal Contact, this can be done by the concerned persons themselves via the web interface and their password, as set during registration.

15 . Historical purposes

Project files are kept in the archives in Zaventem according to Commission rules.

Recipients

16 . Recipients

Without prejudice to a possible transmission to the bodies in charge of a monitoring or inspection tasks in accordance with Community law (for example, Court of Auditors), access to personal data will be given for Applicants data to:

a) For Experts Evaluators/Reviewers to:

- Internal authorised Commission staff and contractors that are working on behalf of and under the responsibility of the Commission to manage the operational and financial aspects of research projects within the Research Framework Programmes or other Programmes and Initiatives;
- Other European Institutions or Community Programmes/Bodies/Initiatives linked to the Research Framework Programme or to other Programmes and Initiatives;
- Concerning data collected at the time of the registration:
 - Public research funding bodies from the Member States and the States associated to the Framework programmes or to other Programmes and Initiatives;
 - Commission departments not involved in the administration of the research Framework Programmes or other Programmes and Initiatives, and seeking particular scientific or technical expertise to assist in the administration of other EU programmes.

Such accesses to the database may be granted to individual authorised named persons, on receipt of a written request and only to data on persons who have expressly agreed to allow such access to their personal entry (cf. the 2 opt in options described in point 7).

• Public: basic information (e.g. name, first name) of experts who participated in evaluations are published on CORDIS (<http://cordis.europa.eu>)

b) For Applicants to:

- Internal authorised Commission staff, independent experts and contractors who are working on behalf of the Commission for the purposes of proposal evaluation, and for selected projects under a grant agreement, to manage the operational and financial aspects of research projects within the Research Framework Programmes or other Programmes and Initiatives;
- Other structures associated with the Research Framework Programmes, other Programmes and Initiatives, such as e.g. Programme Committees, Advisory Groups, other European Institutions or Community Programmes/Bodies/Initiatives;
- Public: for projects under a grant agreement, a limited subset of data (e.g. all the contact details of the participants, total budget of the project) may be published on the CORDIS website/Europa/other dedicated Internet webpage/paper in order to provide the necessary information to facilitate contacts between interested parties and the research consortium, and may be printed for further dissemination.

In addition, if the project coordinator/leader, principal investigator (PI) or any participant in a funded project gives his prior and unambiguous consent (cf. questions 12) and 15 a)), information such as picture, age, nationality and short curriculum vitae may be published on paper and Internet.

17 . Transfer out of UE/EEA

Not applicable - no transfer of personal data to third party countries.

Security measures

18 . Technical and organizational measures

Access to the data is only available to registered users as approved by their hierarchy through a separate access control module managed by RTD (ECAS and SECUNDA for the OMM). The security module logs which user has requested access to the system, together with date and timestamp. General comment applying to all sub-points: • Data processing for Proposal applicants is limited via registration and access control to own areas only and in submitting proposals. • Data processing is on the central IT infrastructure of the Commission (data centre and data network) maintained by DG DIGIT, following the rules, procedures, organisation, and security rules of DG DIGIT. • Physical access control to network, servers and media is managed by DG DIGIT. Access to the data is only available to processors and registered users as approved by their hierarchy through a separate access control and security module (SECUNDA). The security module logs which user has requested access to the system, together with date and timestamp. Authentication is based on the DIGIT ECAS mechanism.

- a) preventing any unauthorised person from gaining access to computer systems processing personal data; : No specific measure - see general comments in point 31).
- b) preventing any unauthorised reading, copying, alteration or removal of storage media; :No specific measure - see general comments in point 31).
- c) preventing any unauthorised memory inputs as well as any unauthorised disclosure, alteration or erasure of stored personal data; :No specific measure - see general comments in point 31
- d) preventing unauthorised persons from using data-processing systems by means of data transmission facilities; :No specific measure - see general comments in point 31).
- e) ensuring that authorised users of a data-processing system can access no personal data other than those to which their access right refers;:No specific measure - see general comments in point 31).
- f) recording which personal data have been communicated, at what time and to whom;:No specific measure - see general comments in point 31).
- g)ensuring that it will subsequently be possible to check which personal data have been processed, at what time and by whom; :No specific measure - see general comments in point 31).
- h) ensuring that personal data being processed on behalf of third parties can be processed only in the manner prescribed by the contracting institution or body; :See general comments in point 31), also • IT administrators have access to personal data
- i) ensuring that, during communication of personal data and during transport of storage media, the data cannot be read, copied or erased without authorisation; :No specific measure - see general comments in point 31).
- j) designing the organisational structure within an institution or body in such a way that it will meet the special requirements of data protection; :No specific measure - see general comments in point 31).

General comments applying to all sub-points:

- Organisational structures have been set up in accordance with the principles of the Regulation 45/2001.
- Access to personal data collected is only granted to users "who need to know" through UserId/password.
- Where personal data are collected through an external company, the latter has to adopt organisational measures in order to guarantee the data protection and confidentiality required by the Regulation 45/2001.
- It could be that the data subject may opt-out for the publication of certain of his/her personal data, while the access to the rest of the personal data collected is only granted through UserId/password to a defined population of users or through the offered opt in options for another population of users (cf. point 7).
- a) preventing any unauthorised person from gaining access to computer systems processing personal data; : General comments applying to all sub-points: - Organisational structures have been set up in accordance with the principles of the Regulation 45/2001. - Access to personal data collected is only granted to users "who need to know" through User Id/password. - Where personal data are collected through an external company, the latter has to adopt organisational measures in order to guarantee the data protection and confidentiality required by the Regulation 45/2001. - It could be that the data subject may opt-out for the publication of certain of his/her personal data, while the access to the rest of the personal data collected is only granted through User Id/password to a defined population of users or through the offered opt in options for another population of users (cf. point 7). No specific measures - see general comments in points 31) and 32).
- b) preventing any unauthorised reading, copying, alteration or removal of storage media; :No specific measures - see general comments in points 31) and 32).
- c) preventing any unauthorised memory inputs as well as any unauthorised disclosure, alteration or erasure of stored personal data; :No specific measures - see general comments in points 31 and 32
- d) preventing unauthorised persons from using data-processing systems by means of data transmission facilities; :No specific measures - see general comments in points 31) and 32).
- e) ensuring that authorised users of a data-processing system can access no personal data other than those to which their access right refers;:No specific measures - see general comments in points 31) and 32).
- f) recording which personal data have been communicated, at what time and to whom;:No specific measures - see general comments in points 31) and 32).
- g)ensuring that it will subsequently be possible to check which personal data have been processed, at what time and by whom; :No specific measures - see general comments in points 31) and 32).
- h) ensuring that personal data being processed on behalf of third parties can be processed only in the manner prescribed by the contracting institution or body; :No specific measures - see general comments in points 31) and 32).
- i) ensuring that, during communication of personal data and during transport of storage media, the data cannot be read, copied or erased without authorisation; :No specific measures - see general comments in points 31) and 32).
- j) designing the organisational structure within an institution or body in such a way that it will meet the special requirements of data protection; :No specific measures - see general comments in points 31) and 32).

19 . Complementary information

Enclosures: the Guide to Financial Issues relating to FP7 Indirect Actions and the note and its annexes sent by the Controller to his processors.

Note to points 23-26:

OPOCE is responsible for the relations with the data processor in respect of CORDIS, the EMPP module and some elements of the SESAM module; REA is responsible for the management of the SEP service and the Central Validation Team (CVT); DIGIT is the data processor in respect of the other modules.

List of attachments

- [FP7 Ind Actions.pdf](#)
- [Annexe 5 \(check-list\).pdf](#)
- [Note 24839 of 23-10-2007.pdf](#)
- [Annexe 1 \(contexte et terminologie\).pdf](#)