



European Commission Data Protection Officer

DPO-1260.1 DG INFSO Back Office notification re: Processing of personal data submitted by proposal Applicants and reviewers/evaluators in the context of Framework Programmes and Other Programmes and Initiatives, managed by the General Directorate Information Society & Media (DG INFSO)

Directorate-General: Communications Networks, Content and Technology

Controller: MOLLER Morten

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Processing

1. Name of the processing

DG INFSO Back Office notification re: Processing of personal data submitted by proposal Applicants and reviewers/evaluators in the context of Framework Programmes and Other Programmes and Initiatives, managed by the General Directorate Information Society & Media (DG INFSO)

2. Description

Note: An overview of the key INFSO processing operations is provided in the attached document AND attached diagramme.

Processing of the information needed to manage framework programmes and other programmes and initiatives in accordance with the appropriate legal framework throughout their whole lifecycle, including:

For Applicants:

- Call Publishing (*)
- Proposal submission and evaluation (*)
- Proposal negotiation, ranking and decision (*)
- Contract preparation, generation, validation, execution, termination and monitoring (*)
- Transferring financial transactions to and from the Commission's accounting system for further validation and processing
- Publication of Project summaries, contact information of the Project, project events and in general project information classified as public by the project, on Cordis or Europa (*)
- Statistics, reporting and information relating to management and monitoring of programmes and initiatives (includes project information storage for statistics and auditing purposes)
- Auditing

For Experts:

- Call Publishing (*)
- Experts Registration management (legacy - see attachment in point 7)
- Experts Selection (for proposal evaluations)

- Experts Contracts and Payments management
- Experts Selection (for projects review)
- Reporting (includes project information storage for statistics and auditing purposes)
- Security management (*)
- Exchange of information EU with Experts/Organisations

The data processed does not fall under Article 27, and does not require prior checking by the European Data Protection Supervisor, except the selection of experts (based on their CV) in view of evaluating proposals, reviewing & monitoring projects which is a processing falling under art. 27.2 (b) of the Regulation 45/2001.

(*): These steps include automated processing that is covered by the DG RTD Front-office notification (DPO-978).

2007-12-14 Q7 Processing Operations at INFSO v6.doc
Architecture INFSO of 20071214.pdf

3. Sub-Contractors

N.A N.A|N.A N.A|N.A N.A|N.A N.A|N.A N.A|N.A N.A|N.A N.A

4. Automated / Manual operations

All processing operations have an automated part. This point covers back office automated processing operations and supporting IT systems, see attachment in Question 7. The front office automated operations and supporting IT systems are covered by the DG RTD front-office notification (DPO-978). This includes "Call Publishing" (Call Passport), "Proposal submission" (EPSS), "Proposal Evaluation and Ranking" (ESS), "Experts Registration" management on Cordis (EMC), basic "Information Dissemination" on Cordis and other websites accessible to Public, "Organisation Registration" and "Organisation Management" (PDM/URF). See attached document (under question 7) on an overview of the processing operations at INFSO.

The Local IT systems and supported back-office processing operation includes to date:

- ExpertReg: "Expert Registration" and "Experts Selection" for Non-Framework Programmes and Initiatives (except for the CIP programme),
- ICTPSP Expert DB: "Expert Registration" and "Experts Selection" for the CIP programme
- Expert Registration DB for the eContentPlus (ECP) & Safer Internet Plus (SIP) programmes
- PILUX: Evaluation of proposals
- NEF "Negotiation form"
- PHOENIX: "Project Contract and Payments Management"
- A-GATE: "Project Contract Payment" (via the Sincom Financial System - DG BUDG)
- TCL/AL: "Expert Contracts and Payments"
- iFLOW: "Contract and Payments management" - Workflow management system
- PPM: Phoenix "Project Management"
- IOMM: INFSO "Organisation Management" (transition phase)
- FJORD-MIS : "Reporting "
- ARPS: "Projects Auditing"
- APUS: "Security Management" Local systems
- AL2: "Application Letter-v2"

The scope of the back-office manual processing of personal data performed by EU staff or contractors on their behalf includes:

- Selection of Experts for proposal evaluation, or project review and monitoring purposes. Note that Experts' data are provided and maintained by the Experts themselves
- Managing Expert Contracts and Payments for services during proposal evaluation, or project

review and monitoring. Bank account is provided by Expert and verified by INFSO.

- Managing the list of Proposals for further processing, including negotiation, and selected proposal lists approval.
- Managing the list of selected Projects, for further processing, including contract preparation, and initial payments.
- Managing the projects deliverables and further processing, including contract amendments, and intermediate or final payments.
- Managing reporting requirements for operation at Project, Operational Unit, Directorate or INFSO level.
- Carrying out Projects auditing, to assess whether or not all relevant legal obligations were properly followed.
- Managing publication and dissemination of results.
- Managing INFSO users access to supporting IT systems.

Documents on paper are put in files.

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 format in the Project Officer's (PO) office, the AFUs (Administration & Finance Units) office, as well as archived at the Commission storage facilities.

6. Comments

Note: In INFSO, everyone in operation Units may request and get access to information provided by Applicants and Experts, and they can prepare payments for experts and contracts. However, payments are approved and carried forward by the Administration and Finance Units (AFU) only.

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, as well as other Programmes and Initiatives (see 11 - Legal Basis of Processing).
- To manage the Research Framework Programmes as a whole, in accordance with the applicable regulation(s).
- To manage other (non-Framework Programmes and Initiatives) projects funded by DG INFSO, in accordance with the applicable Legal Framework (see 11 - Legal Basis of Processing).

8. Legal basis / Lawfulness

see attachment

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 access to the Commission's database of potential experts by:

- Public research funding bodies from the Member States and the States associated to the Research Framework Programmes or to other Programmes and Initiatives,
 - Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives,
- 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.

For access to the Commission's database of potential experts by:

- Public research funding bodies from the Member States and the States associated to the Research Framework Programmes or to other Programmes and Initiatives,
 - Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives,
- 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.

Articles 20 (Exemptions and restrictions) and 27 (Prior checking by the EDPS) are not applicable

Q11 LEGAL BASIS OF PROCESSING.doc

Data subjects / fields

9. Data subjects

See point 16

10. Data fields

The IT applications manage general personal data required to achieve the purposes of the processing operations.

They do not manage any sensitive personal data which fall under article 10 of Regulation (EC) N° 45/2001 of the 18 December 2000.

IT administrators have access to user identification such as login identifier and access rights, as well as information necessary for IT system security and user access auditing reasons.

For Applicants, the data collected are:

- Last name, First name
- Title, Gender
- 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 to be collected:

- Bank account reference (IBAN and BIC codes),
- VAT n° (where applicable)

Data relating to Experts evaluators and reviewers:

- First Name, Name,
- Phone number, fax number, e-mail address,
- Expert type
- Passport n°, Place/Date of Birth,
- Previous Family Name, Employment details (including whether currently employed, current employer, and 5 previous employers),
- Candidature reference, previous proposal submitted & programme,
- Professional experience, Research interest, and expertise (in keywords),

And, in case of appointment:

- Bank account reference (IBAN and BIC codes),
- VAT n° (where applicable),

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.

See point 17 above

Q21 Categories of recipients)[1].doc

Rights of D.S.

11. Information

The attached Specific Privacy Statements will be published on the following Web Pages:

1. On <https://cordis.europa.eu/emmfp7/index.cfm?fuseaction=wel.welcome>, where experts register their personal data in view of applying for Evaluation of proposals, Reviewing and Monitoring the projects in the context of Framework Programmes or Other Programmes and Initiatives managed by Research DGs and DG INFSO in particular,
2. Two SSPS: one On <https://ec.europa.eu/research/participants/urf/secure/new/initialRegistrationRequest.do> and the other one on <https://www.epss-fp7.org/epss/welcome.jsp>, where applicants register electronic submission for proposals in the context of Framework Programmes or Other Programmes and Initiatives managed by Research DGs and DG INFSO in particular.
3. ON http://ec.europa.eu/information_society/activities/eten/cf/index.cfm where experts register themselves in view of applying for Evaluation of proposals, Reviewing and Monitoring the projects supporting eTEN Project Officers in their project management (DG INFSO specific programme eTEN).
4. ON http://ec.europa.eu/information_society/activities/eten/cf which is the search facility to find a partner for the eTEN programme (DG INFSO specific).
5. ON http://ec.europa.eu/information_society/activities/ict_psp/cf/expert/login/index.cfm where experts register themselves in view of assisting the Commission to administer the CIP Policy Support Programme.
6. ON http://ec.europa.eu/information_society/tools/ecp_sip/index.cfm?loginFormStart where experts register themselves in view of assisting the Commission to administer the "eCONTENT Plus" Programme & the "Safer Internet Plus" Programme
7. ON http://ec.europa.eu/information_society/activities/econtentplus/calls/proposals/index_en.htm and ON http://ec.europa.eu/information_society/activities/sip/call/proposals/index_en.htm, where calls for proposals are published in the context of the "eCONTENT Plus" and "Safer Internet Plus" Programmes.

2007-04-03 SSPS eTEN Expert Database.doc

2007-04-23 SSPS eTEN Partner Search.doc

2008-01-09 SSPS for CIP (experts registration).doc

V2.1 200800618 SSPS EXPERTS (clean).doc

V3.1 20080618 SSPS APPLICANTS EPSS (clean).doc

V3.1 20080618 SSPS APPLICANTS URF (clean).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

According to Commission rules

For Applicants:

For proposals retained for funding and grant agreement, data are kept for the longer one of the possible following periods :

- Duration of the individual projects (plus 10 years after the end of the project to allow for audits)
- Duration of the Research Framework Programmes and other programmes & Initiatives managed by DG INFSO (plus 5 years on individual projects to allow for audits)
- Duration of an audit (if one is in progress)

For proposals which are not granted, personal data are kept for 3 years and erased after this period.

For Experts:

10 years after their last update, unless of course they delete them themselves

14. Time limit

Blocking or rectifying data may be made by the Experts themselves and on request (processed within 10 working days) for Applicants, as mentioned to the data subjects in the corresponding SSPS (see point 15). The password chosen by Experts during registering will allow them to log in to the system and update their personal information or delete their registration.

15. Historical purposes

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

Recipients

16. Recipients

Individuals falling in the categories listed in point 21 below.

The coordinator of a project represents the other partners/beneficiaries towards the Commission services (as provided for in the Grant Agreement) and is the intermediary for any communication between the consortium and the Commission services. In the frame of this mandate, the coordinator is processing personal data of the partners on his/her own responsibility.

Because of lack of space, please see attachment to point 17.

17. Transfer

N/A

No transfer of personal data to third party countries, unless publication on the Cordis/Europa Website of limited personal data as explained under question 21