

DPO-2382.3 - RTD : Back-office notification: processing of data submitted by proposal Applicants and reviewers Experts in the context of Framework Programmes and other Programmes and Initiatives, managed by the Research General Directorate (DG RTD).

General information

Creation : 26/10/2007

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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 :

DPC Notes :

Processing

1 . Name of the processing

Back-office notification: processing of data submitted by proposal Applicants and reviewers Experts in the context of Framework Programmes and other Programmes and Initiatives, managed by the Research General Directorate (DG RTD).

2 . Description

Note: An overview of the key RTD processing operations is provided in the attached document.

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:

- Proposal evaluation (*)
- Proposal negotiation, ranking and decision (*)
- Contract preparation, generation, validation, execution and monitoring (*)
- Transferring financial transactions to and from the Commission's accounting system for further validation and processing
- Publication of Project summaries 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:

- Experts Selection (for proposal evaluations)
- Experts Contracts and Payments management
- Experts Selection (for projects reviews)
- 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 of the Regulation 45/2001, 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 operation falling under art. 27.2 (b) of the Regulation

45/2001.

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

[List of attachments](#)

- [Architecture V2 PDF.pdf](#)
- [Some explanation relating to front-back architecture V0.2.doc](#)

3 . Processors

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 front-office notification DPO-978 (DG RTD). 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" (URF/PDM/OMM).

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

For both Experts and Applicants:

- SECUNDA: "Security Management" for local users
- CIRCA: "Documents exchange system"

For Applicants:

- CPM: "Contract & Project Management"
- NEF: Negotiation module and back-office
- PRIMA: "Proposal Evaluation & Ranking"
- SESAM, CORDA: "DG Reporting" for socio-economic data
- CPF Editor: "Contract Preparation Forms"

For experts:

- EMI: "Expert Management Module"

- The scope of the back-office manual processing operations performed by EU personnel 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 Experts themselves.
 - Managing Expert Contracts and Payments for services during proposal evaluation, or project review and monitoring. Bank account is provided by experts and verified by RTD.
 - 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 and further processing, including deliverables, contract amendments, and intermediate or final payments.
 - Managing reporting requirements for operation at Project, Operational Unit, Directorate or RTD level.
 - Carrying out Projects auditing, to assess whether or not all relevant legal obligations were properly followed.
 - Managing publication and dissemination of results.
 - Managing RTD users access to supporting IT systems.

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 centers operating under the same rules as the Digit data center. 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 the Project Officer's (PO) office, the AFUs (Administration & Finance Units) office, as well as archived at the Commission Zaventem storage facility.

6 . Comments

DG RTD staff of operational Units may request and get access to information provided by Applicants and Experts. 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.
- 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 Family's DGs as a whole, in accordance with the applicable Legal Framework.

8 . Legal basis and Lawfulness

Cf. attached list.

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.

For paper and Internet publication of pictures and short curriculum vitae of grantees (successful applicants), the data subject has given his prior unambiguous consent (opted in at the time of the registration, or signed a dedicated declaration agreement -cf. model attached to question 15)-).

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

[List of attachments](#)

- [Legal basis \(point 11\).doc](#)

Data subjects and Data Fields

9 . Data subjects

See point 16.

10 . Data fields / Category

The IT applications manage general personal data required to achieve the purposes of the processing. They do not manage any sensitive personal data in the meaning of 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 being collected:

- Bank account reference (IBAN and BIC codes),
- VAT no (where applicable)

And, if prior agreement of a grantee, for publication:

- Short curriculum vitae
- Picture

Data relating to expert 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 no (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

[List of attachments](#)

- [Categories of recipients \(point 21\) V2.doc](#)

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 displayed on websites that collect personal data (for Applicants: <https://ec.europa.eu/research/participants/urfi/secure/new/initialRegistrationRequest.do> and <https://www.epss-fp7.org/epss/welcome.jsp>, for experts: <https://cordis.europa.eu/emmf7/index.cfm?fuseaction=wel.welcome>).

Cf. enclosed privacy statements, 1 for experts-reviewers, 2x1 for applicants.

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 and short curriculum vitae at a later stage, through signature of the enclosed declaration of agreement.

List of attachments

- [V2.1 200800618 SSPS EXPERTS \(clean\).doc](#)
- [Declaration of agreement 20090619 \(clean\).doc](#)
- [V5.0 20090619 SSPS APPLICANTS URF \(clean\).doc](#)
- [V5.0 200900619 SSPS APPLICANTS EPSS \(clean\).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 Initiatives (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 they 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 in Zaventem according to Commission rules.

Recipients

16 . Recipients

Individuals falling in the categories listed in point 21.

Because of a lack of space, please see attachment to point 17: "Categories of recipients (point 21)"

17 . Transfer out of UE/EEA

Not applicable - no transfer of personal data to third party countries, unless publication on the CORDIS website of limited personal data as explained under question 21.

Security measures

18 . Technical and organizational measures

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 to 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.

General comment applying to all sub-points:

Organisational structures have been set up in accordance with the rules of the DPO. Access is only granted by the security administrator within the policy guidelines, and to users approved by management.

The organisational measures recognise that the physical infrastructure is under the control of DG DIGIT, as well as RTD IRM. The organisational measures therefore concentrate on access control through the Commission's desktop equipment.

See general comment in point 31

General comment applying to all sub-points: Organisational structures have been set up in accordance with the rules of the DPO. Access is only granted by the security administrator within the policy guidelines, and to users approved by management. The organisational measures recognise that the physical infrastructure is under the control of DG DIGIT, as well as RTD IRM. The organisational measures therefore concentrate on access control through the Commission's desktop equipment.

19 . Complementary information

Cf. enclosures: note from the Controller to the processors (all directorates) and its annexes.

List of attachments

- [Note 24839 du 23-10-2007.pdf](#)
- [Annexe 1 \(contexte et terminologie\).pdf](#)
- [Annexe 3.1.doc](#)
- [Annexe 5 \(check-list\).pdf](#)