DPO-978.6 - RTD: Collection and processing of data submitted by proposal Applicants/project Participants/Organisations and Experts in the context 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

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Registration: 15/01/2013

Status : Register

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: Update of DPO-978 regarding:

- The publication of the projects' coordinators' contact details (opt-out);
- The possible (opt-in) publication of any personal data of any person participating in a project;
- The modification of the the IT and business architectures, with the subsequent abandonment of the former front-end/back-office boundary. Each DG and EA becomes the Controller of all its processing operations of Experts and members of Applicants/Participants/Organisations, end-to-end (and whatever the distribution of IT, the System Owners of which are the Processors of the Controllers):
- The description of the processing operations with no direct relation to IT systems as such, but to the business functions they support (e.g. phasing-out of CORDIC/EMC replaced by EMPP, EPSS- and then ESS- by SEP, etc.).

# **Processing**

### 1. Name of the processing

Collection and processing of data submitted by proposal Applicants/project Participants/Organisations and Experts in the context of Framework Programmes and other Programmes and Initiatives managed by the Directorate-General for Research and Innovation (DG RTD)

### 2. Description

- (i) Collection and processing of the information needed to manage Framework Programmes and other Programmes and Initiatives, in accordance with the appropriate regulations.
- (ii) Lifecycle of processing operations for Applicants/Participants and Experts:

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 Participant Portal. 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 Participant Portal.

Organisations should submit their legal and financial information via the Participant Portal in order that the Validation Services could perform the legal and financial verification of the entities. Upon registration (and validation), the organisations receive a Participant identification code that can be used in 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 European Commission (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 Call Coordinator for "Proposal Evaluation". Before proposals are submitted, a limited set of data is made available (list of Participants, contact details, proposal short summary, acronym, activity topic) mainly for call coordinators and staff directly involved in the preparation of evaluations and the selection of Experts. The DG 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;
- 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.

At the end of the evaluations or at latest when the proposals are approved for funding, Project Officers are assigned by the different Directorates of the DG 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 via the Participant Portal is validated by the Validation 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 the concerned DG operations and response to Parliamentary questions concerning funds, projects funded and socioeconomic issues. In addition, the DG carries its own internal auditing for on-going 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. CORDIS also disseminates information on projects' results.

- (iii) The processing operations include:
- a) For Applicants/Participants:
  - · Call Publishing;
  - External user support (e.g. Helpdesk Applicants);
  - Electronic Proposal Submission:
  - · Management of user accounts and permissions;
  - · Management of Codes & Calls reference data;

- Publication of National Contact Point (NCP) names and contact details on CORDIS or Europa, depending on the programme;
  - · Organisations (Applicants) registration, verification, validation;
  - Exchange of information between EU Organisations (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:
- Statistics, reporting and information relating to management and monitoring of programmes and initiatives (includes project information storage for statistics and auditing purposes);
  - Auditing

For Participants in proposals retained for funding, publication on the CORDIS portal/Europa/any other dedicated Internet website/paper of:

- Project summaries, report and other deliverables marked as publishable;
- · All the contact details of Participants (e.g. phone, fax, email, postal address, location);
- Any additional information provided by project coordinators, 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.
- b) For Experts:
  - Registration of their profile by Experts themselves (via a web-based application);
  - · 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 with Experts/Organisations.

For Experts who have opted-in (2 further categories of recipients relating to 2 opt-in options), provision of their data to:

- Public research funding bodies and or other Programmes and Initiatives of Member and Associated States:
- Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives, and seeking particular scientific or technical Expertise to assist in the administration of other EU programmes.

For Experts appointed for proposal evaluation or project review and monitoring, further data are collected and processed:

- Their Legal Entity Form (LEF): PO BOX, passport number / identity card number, place of birth, country of birth, FAX numbers, copy of passport or identity card (scanned documents or otherwise reproduced). The related processing operations are cross-covered by notification DPO-372 of DG BUDG;
- Theie Bank Account Form (BAF): Name of the account holder, bank name, branch address (street), town/city, postcode, country, account number, IBAN/Other. The related processing operations are referred to in the notification DPO-370 of DG BUDG;
- Their Appointment Letter: ID, type of work, validity period, location, details including description, status and actions:
- Their reimbursement form: programme/priority/theme, call number, AL ID, Expert surname, Expert first name, detail on number of days worked, detail of travel; declaration of wish to claim travel costs, daily allowance, accommodation allowance, place of task, date of arrival at meeting place, meeting start and end dates, transportation type, place of departure/arrival, class of travel, price, supporting document.
- (iv) In addition, some personal data may be disclosed in compliance with the relevant current legislation and established case law, and on a temporary basis to:
- (a) The Civil Service Tribunal, at its request;
- (b) The Ombudsman, at his request;
- (c) The European Data Protection Supervisor (EDPS), at his request;
- (d) The audit and control bodies such as OLAF, Court of Auditors.

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).

Therefore, the present notification has not been submitted to a prior checking by the EDPS.

### 3. Processors

Any statutory or non-statutory staff of DG RTD, other DGs and EAs of the Research family, DIGIT, DG HR, the Publication Office (cf. notification DPO-1332 of OP for CORDIS).

Sub-contracting: any processing operations performed on behalf of the DG (the Controller) by a contractor (a Processor) are pursuant to Regulation (EC)45/2001. The subsequent obligations of the Processor are made mandatory via a dedicated contractual clause (enclosed).

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 for Applicants. The front-office operations relating to Experts are covered by the Research Executive Agency (REA).

All EC IT systems are compliant with the <u>Commission Decision of 16 August 2006 C(2006) 3602 concerning</u> the security of information systems used by the European Commission.

Besides, EC contractors which run IT systems on behalf of EC abide contractually by Regulation (EC) N° 45/2001. They act only on instruction from the data Controller and undertake to adopt appropriate technical and organisational security measures having regard to the risks inherent in the processing and to the nature of the personal data concerned (cf. question "3. Processors").

These IT systems support the following operations:

- · Call publication;
- · User Helpdesk;
- · Submission of Proposals:
- · Publication of NCP names and contact details;
- · Management of Codes and Calls reference data;
- · Security Management for local users:
- · Evaluation Support;
- Organisations Registration, verification, validation and management;
- · Identity and access Management;
- Experts Registration:
- · Experts Management;
- · Security Management for local users:
- · Contract & Project Management;
- · Negotiation:
- DG Reporting" for socio-economic data
- Publication and dissemination of project information and results;
- Etc.

The scope of the manual processing operations performed by EU personnel or contractors on their behalf includes (manually initiated transfer of data between systems is not considered as a processing operation and it is not mentioned here):

- Updating the calls reference data after a new call or Research DG reorganisation;
- · Publishing a call after input is received;
- 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;
- 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 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

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 the evaluation of proposals and review of projects submitted for funding or funded through the Research Framework Programmes;
  - The Research Framework Programmes as a whole, in accordance with the applicable regulation(s);
- Other (non-FP) Programmes funded by Research DGs and related EAs and JUs as a whole, in accordance with the applicable Legal Framework.

### 8. Legal basis and Lawfulness

The legal basis references are listed below, and may be updated into the register of data protection officer of the European commission with respect to legal acts to be adopted in relation to FP7 activities or other Programmes and Initiatives.

- Article 16 of the Treaty on the Functioning of the European Union (ex Article 286 TEC)
- Regulation (EC) No 45/2001 of the European Parliament and of the Council of 18 December 2000 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data (OJ L 8/1, 12.01.2001)
- 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)
- Commission Decision C(2008) 3980 of 31 July 2008 delegating powers to the REA with a view to performance of tasks linked to implementation of the specific Community programmes People, Capacities and Cooperation as amended by Commission Decision C(2010) 5184 of 30 July 2010 (the Delegation Act)
- The Memorandum of Understanding between the REA and its parent DGs, namely the Directorates-General for Research and Innovation (DG RTD), for Enterprise and Industry (DG ENTR), and for Education and Culture (DG EAC)
- Commission Decision 2011/161/EU, Euratom of 28 February 2011 amending Decision C(2008) 4617 related to the rules for proposals submission, evaluation, selection and award procedures for indirect actions under the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007-2013) and under the Seventh Framework Programme of the European Atomic Energy Community (Euratom) for nuclear research and training activities (2007-2011)

- 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)
- Commission Decision C(2007) 2466 of 13 June 2007 on the adoption of the rules to ensure consistent verification of the existence and legal status of Participants, as well as their operational and financial capacities, in indirect actions supported through the form of a grant under the Seventh Framework Programme of the European Community for research, technological development and demonstration activities (2007-2013) and under the Seventh Framework Programme of the European Atomic Energy Community (Euratom) for nuclear research and training activities (2007-2011)
- 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 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 (EC) N° 58/2003
- 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)
- 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) N° 58/2003
- Commission Decision N. 2007/134/EC of 2 February 2007 establishing the European Research Council, and its amendments
- 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
- 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
  - 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

- 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;
  - Ensure compliance of Commission with legal obligations;
  - Perform a contract with the data subject (or take steps prior to entering into contract);

As described in points (a), (b) and (c) of article 5 of Regulation (EC) 45/2001.

# **Data subjects and Data Fields**

### 9. Data subjects

- Persons in organisations requesting (Applicants) or receiving (Participants) 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

- a) Applicants:
- (i) 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;

(ii) And, if the proposal is selected, then additional information is being 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;
- (iii) And the following information is published on CORDIS portal/Europa/other dedicated Internet website/paper for all selected proposals/funded projects:
- · Project summaries, reports and deliverables that have been marked as publishable;
- · All the contact details of the administrative representative of each Participant as well as of the Project Coordinator (e.g. phone, fax, email, postal address, location).
- (iv) 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):
- · Last name:
- · First name;
- · Title:
- · Gender;

- · Department/Faculty/Institute/Laboratory name;
- · Phone:
- · Mobile phone;
- · Email;
- · Fax:
- · Address, if different from organisation address;
- · Short curriculum vitae (professional contact details, education and work experience);
- · Nationality (for statistical and communication purposes e.g. the analysis of the mobility of researchers-);
- · Age (for statistical and communication purposes e.g. the analysis of the participation of young/elder researchers-);
- · Picture.
- (v) 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 SSPS "Applicants" (attached to point 11.), to be filled in and signed by the data subject, and kept at disposal of the Controller by the Participant for any possible verification.

- b) Experts (evaluators, reviewers, reporters)
- (i) Data collected at the time of their registration:
- Personal details: title, first name, family name, gender, date of birth, nationality (ies), e-mail address, address (es) (current and previous declared addresses), street (number and name), town/city, post code, country, telephone numbers (fixed, mobile);
  - Languages: language(s) level in terms of writing, reading and conversation is indicated;
  - Education: title of qualification, subject or field, name of institution, country, and year awarded;
- Area of expertise: indication of specialist field(s) and pre-defined themes (Expert selects the specialist field(s) and pre-defined themes that best describe their expertise) and description of expertise using own keywords/phrases;
- Employment history, including information on: current and previous employment (organisation name, department/sector, job title, employment dates, town or city, country, organisation type and size), current employment status, total number of years of specialist/related experience and indication of experience in the industrial sector;
- Experience in field: information concerning assistance to the European Commission in its research framework programmes. The type of role is indicated and area of work and dates are mentioned in a free text field:
- Publications & Achievements: for publications, title, date, authorship, name of publisher/journal, keywords. For achievements, date, country and nature of achievement (as free text). For patents, the reference should be added:
- Additional information: free text field where the Expert can add information and/or provide a link to a website where their CV is published, if they wish;
  - Type of Expert: FP7 Expert and/or Expert for other funding programmes;
- (ii) And, in case of appointment:
- · Bank account form (IBAN and BIC codes);
- · Legal Entity Form (LEF).
- (iii) When registering, Experts can select whether or not (opt-in options) they authorise access to their data to:
- Commission departments not involved in the administration of the research Framework Programmes or of other Programmes and Initiatives, and seeking particular scientific or technical expertise to assist in the

administration of other EU programmes;

· Public research funding bodies and other Programmes and Initiatives of Member and Associated States.

# **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 a Service Specific Privacy Statement (SSPS) displayed on the <u>Participant Portal</u>, where the Applicants' and Experts personal data are collected and registered (within the scope of Experts registration, Proposal submission, Organisation registration, and Organisation management), published under the link <u>Legal notice</u>.

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 at a later stage (cf. section 10), through signature of a declaration of agreement.

List of attachments

- SSPS Applicants v7.7.doc
- SPS Selection and Management of Experts September 2013.pdf

## 12 . Procedure to grant rights

For any questions related to their rights under articles 13-9, and depending on where they are in the workflow (registration versus further processing of their personal data), data subjects can contact the Controller, by using:

a) For Applicants:

- · The Validation Service for any question concerning the Organisation registration and management (<u>REA-URF-VALIDATION@ec.europa.eu</u>);
- · The contact information given in the Call for any question on Proposal submission;

The designated Project Officer

b) For Experts:

- · The entity responsible for Expert registration area of the Participant Portal, using the following email address: <a href="mailto:ec-expert-area@ec.europa.eu">ec-expert-area@ec.europa.eu</a>;
- The contact information given in the appointment letter.

In any case, please specify the details of your request.

Any information relating to the processing of your personal data is detailed in the register of the Data Protection Officer of the European Commission:

http://ec.europa.eu/dataprotectionofficer/register/index.cfm?TargetURL=D\_REGISTER

#### 13. Retention

For Experts selected and 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..

As Experts may themselves update or delete their personal data online, personal data not updated after 10 years will be removed from the databases.

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 is kept for 3 years after the latest of the decision of the rejection of the proposal by the Programme Steering Committee / the closing of the project (if the negotiation failed) / the last update made by the concerned authorised representative of the data subject.

### 14. Time limit

Blocking or rectifying data falling could be done on request, as mentioned in the Specific Privacy Statement (cf. point 11).

Regarding erasing proposal contacts, this can be done by the concerned persons themselves via the web interface and their password, as set during registration (cf. point 2).

### 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:

- a) For Experts data 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;
- · Public: basic information (e.g. name, first name) of Experts who participated in evaluations are published on CORDIS (http://cordis.europa.eu).

In addition, and further to their prior approval through the "opt-in" options at the time of their registration, access to the Expert's profile data may be granted to other Public research funding bodies and programmes, as well as to other Commission departments.

- b) For Applicants/Participants data 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. contact details of the administrative representatives of Participants in the project, and of the Project Coordinator, total budget of the project, publishable deliverables) is 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, 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), and according to the "need to know" principle. The security module logs which user has requested to access to the system, together with the date and timestamp.

General comments applying to all sub-points:

- Authentication is based on the DIGIT ECAS mechanism;
- 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;
  - Organisational structures have been set up in accordance with the principles of the Regulation 45/2001;
- 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 (cf. point 3);
- It could be that the data subject may opt-out for the publication or provision 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.

### 19 . Complementary information

Enclosure: the Guide to Financial Issues relating to FP7 Indirect Actions.

The Publication Office is responsible for the relations with the data processor in respect of CORDIS; REA is responsible for the implementation of the submission and evaluation services and the Central Validation Team (CVT); CNECT manages the evaluation support service; DIGIT is the data processor in respect of the other modules.

List of attachments

• FP7 Ind Actions.pdf