



PRIVACY STATEMENT
GRANT MANAGEMENT AND REGISTRATION/VALIDATION
OF PARTICIPANTS

1. Introduction

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

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

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

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

The Joint Controllers have signed a Joint Controllership Arrangement, the essence of which is provided herewith (see Annex ‘[Arrangement between the Joint Controllers](#)’). After the signature of the JCA, all references to “Controller(s)” in the annexes of the privacy statement should be understood as referring to Joint Controller(s).

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

2. Whose personal data do we process?

This privacy statement concerns the following categories of data subjects:

- Concerned staff of Applicants: the legal entities that apply for funding through the submission of proposals for grants or prizes.
- Concerned staff of Beneficiaries: the successful Applicants, i.e. participants in funded projects.
- For Participant Register purposes (Participant Identification Code (PIC) central registration and validation purposes): (i) natural persons who are participants to EU tenders / grants / prizes; or (ii) natural persons who represent or act in or have a certain role on behalf of the legal entities participant[-s/-ing] to EU tenders / grants / prizes.

This includes, for instance, Principal Investigators, Fellows, staff of Applicants/Beneficiaries with attributed roles in the proposals/projects (Primary Coordinator Contacts/Supervisors, Coordinator Contacts, Participant Contacts, Task Manager, Team Members, self-registrants, prize winners, Legal Representatives (LRs), Legal Entity Appointed Representatives (LEARs), account administrators, natural persons as participants in their personal capacity, natural persons who are owners or governing body members of the participants etc. See full list of roles in the Terms and conditions of the Funding & Tenders Portal).¹

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

3. Why do we process your data?

3.1. Purpose of the processing

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

This includes:

- Evaluation of proposals;
- Award of funding if the proposal is successful;
- Management of grant agreements, including the follow-up of the publications generated by the projects, prizes, patents, etc.;
- Communication activities and networking,² as per the rules of each call for proposals or contest for prizes;
- Design, monitoring and evaluation of Research and Innovation Programmes and other EU Programmes and Initiatives by the EU institutions and bodies;
- Participant (applicants, candidates and tenderers) registration and validation: the verification that the entity exists as a legal entity and that its legal data is correct (legal form, address, etc.), the verification of certain special legal statuses that are used in EU funding programmes;
- The assessment of financial capacity and ownership / control structure of participants (applicants, candidates and tenderers) - under certain circumstances and based on a risk assessment of the Authorising Officer;
- The financial and operational management of Grant Agreements - including planning and performance - via the project management tool of the CAJU.

Your personal data may also be processed for the purposes of the Early Detection and Exclusion System Database (EDES-Database) managed by the European Commission, in compliance with the Financial Regulation.³ Information exchanged within the EDES is

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

² For instance, networking among beneficiaries, as well as among fellows/researchers/staff members (including coordinators and supervisors) through the implementation of alumni services.

³ Regulation (EU, Euratom) no 2018/1046 of the European Parliament and of the Council of 18/07/2018 on the

centralised in this database. The database contains information on economic operators that could represent a threat to the Union's financial interests, on economic operators who are in one of the exclusion situations listed in Article 136(1) of the Financial Regulation and on economic operators on which financial penalties are imposed (Article 138). The EDES foresees the right of the person concerned to be informed of the data stored in the database upon their request to the Commission. The information contained in the database is updated, where appropriate, following a request for rectification or erasure or any modification of data. For more information, please visit:

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

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

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

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

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

You may withdraw your consent at any time.

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

4. Which data do we collect and process?

The following personal data are collected and processed:

4.1. Identification and contact data

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

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

General remarks of the Joint Controllers:

- Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation may be received only in as

financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2011, (EU) No 1301/2013 (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision N541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012

much as these data appear spontaneously in the CV provided by the data subjects. Those data are not processed during the management of the call or the execution of the agreement, since they are not pertinent (except for health data in MSCA Special Needs Lump sum call, where this has an effect on the funding);

- The address, city, country, telephone and fax numbers, bank account numbers as well as e-mail addresses provided in the proposal are usually the professional ones related to the legal entity submitting the application. Thus, as a general rule (with the exception of cases where the applicant is a natural person or when self-registrant or account administrator submit their contact details), private addresses or bank account numbers etc. are not processed⁶.

4.2. Proposals retained for possible funding and Grant management

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

4.3. Financial Controls and Audits

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

5. How long do we keep your data?

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

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

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

⁴ Identification (title, name, surname or Researcher ID, when provided) and contact details (e-mail) of scientific staff of beneficiaries.

Regulation, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of unsuccessful applicants for scientific research and/or statistical purposes for up to 25 years,⁵ unless you exercise your right to object under Article 23 of the Regulation;

- For Participant Register operations (i.e. participant registration and legal and financial validation), personal data is kept for 10 years from the end of the year of the last financial transaction⁶ (e.g. payment, recovery order, etc) of the participant's last legal commitment (e.g. grant agreement, procurement contract, prize agreement) or from the end of the year when the participant last interacted with its profile in Participant Register (messages, uploading documents, etc.);

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

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

6. How do we protect and safeguard your data?

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

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

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

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

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

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

The project management tool of the CAJU ensures the security and confidentiality of personal

⁵ Identification (title, name, surname or Researcher ID, when provided) of scientific staff of applicants.

⁶ In EU accounting terms: from the end of the year of the Final Date of Implementation (FDI) in accounting system.

data. Access to the data within the tool shall be restricted depending on the profiles of the users (JU staff/coordinator access/participant access).

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

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

Due to operational reasons, upon signature of the grant agreement, your proposal and its annexes may be made available to third parties, such as contractors in charge of handling the CAJU IT systems and in charge of running the project management tool of the CAJU. The CAJU endeavours to ensure such contractors respect the confidentiality of data and implement data protection safeguards to guarantee the security of personal or other data.

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

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

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

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

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

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

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

NB: Please note that access to your personal data and its modification or deletion may be restricted by the CAJU Internal Rules restricting data subjects rights⁷ as provided for by Article 25 of the Regulation. This is in order to safeguard the rights of other data subjects and/or to respect the principles of equal treatment among applicants and/or the secrecy of deliberations. In that context, these rights may be restricted by the CAJU on a case-by-case basis in line with the Internal Rules, where necessary and appropriate for the purposes. This restriction shall be proportionate to what is strictly necessary for the

⁷ Adopted on 16 December 2021 by the CAJU Governing Board, as part of the Omnibus Decision CAJU-GB-2021-12-16, by which the Decision of the Governing Board laying down internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Clean Sky 2 Joint Undertaking CS-GB-Writ proc 2020-02, are directly transferred and shall apply to CAJU.

purpose of the processing.

2. Contact information

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

Annexes:

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