

PROTECTION OF YOUR PERSONAL DATA

This privacy statement provides information about the processing and the protection of your personal data.

Processing operation: Processing of personal data within the framework of grants and prizes award and management.

Record reference: DPO-02-03

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1. Introduction

The protection of your privacy is of high importance to Global Health EDCTP3 Joint Undertaking (hereinafter referred to as Global Health EDCTP3 JU). Global Health EDCTP3 JU is committed to respecting and protecting your personal data and ensuring your privacy rights.

All data of a personal nature processed within the framework of grants and prizes award and management, namely data that can identify you directly or indirectly, will be handled fairly, lawfully and with due care.

This processing operation is subject to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of individuals regarding the processing of personal data by the Union institutions, bodies, offices, and agencies and on the free movement of such data. The information in this communication is given pursuant to Articles 15 and 16 of Regulation (EU) 2018/1725.

This Privacy statement provides detailed information on all types of data that can be processed in the context of grants and prizes award and management.

2. Controller/ Joint controllers/Processors

The relevant processing operation is under the responsibility of the Executive Director of the Global Health EDCTP3 JU, acting as the Data Controller. Your personal data are processed based on applicable data protection legislation by Global Health EDCTP3 JU, Avenue de la Toison d'Or 56-60, 1060 Brussels, Belgium. The Global Health EDCTP3 JU can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at applicants@global-health-edctp3.europa.eu.

Global Health EDCTP3 JU has appointed a Data Protection Officer (DPO). The task of the DPO is to ensure, in an independent manner, that Global Health EDCTP3 JU complies with the data protection law and protects individuals' rights and freedoms by effectively protecting their personal data. The DPO of Global Health EDCTP3 JU can be contacted by post at following address TO 56, 1049 Brussels, Belgium or by email at data-protection@global-health-edctp3.europa.eu.

Global Health EDCTP3 JU uses the European Commission's IT tools, in particular SEDIA.

Accordingly, the European Commission, the Research Executive Agency (REA), and Global Health EDCTP3 JU act as joint controllers for the related processing activities, based on a joint controllership agreement. In this context, the REA operates under a delegation of powers from the European Commission.

The processing is carried out through the SEDIA IT systems, which comprise the EU Funding and Tenders Portal (including eTendering) and the SEDIA back-office repositories.

Please find here the relevant data protection notices of the European Commission: grants and prizes award and management, published in the online public Register of the Data Protection Officer of the Commission under reference number [DPR-EC-01024.12](#).

3. Why and how do we process your personal data?

Your data is collected and processed for the purpose of the processing operations relating to the award management and follow-up of grants, prizes and financial instruments by Global Health EDCTP3 JU in the context of implementing the funding programmes managed by the Global Health EDCTP3 JU.

The purpose of the processing operations relating to the award, management and follow-up of grants and prizes is to ensure that:

- a. proposals are evaluated against the announced criteria in a transparent and effective manner;
- b. the best proposals are selected for funding;
- c. the ensuing grant agreements are concluded and implemented according to the contractual provisions and in conformity with the sound financial management of the JU budget;
- d. the follow-up of projects aims at maximising the dissemination and exploitation of the research results;
- e. the processing of information (meta-data; personal data; public/confidential information contained in proposals/results/reports/publications/deliverables of projects; and any further information) collected within the course of operations for the evaluation of the JU funding programme is adequate and serves to the improvement of the future JU funding programme; and that
- f. the actions and the provisions of the grant agreements and of the rules of contests for prizes are being properly implemented.

This record covers the entire life cycle of linked personal data processing operations including (but not limited to) application, selection, evaluation, validation, entry into and monitoring of relevant type of legal commitment and all linked financial transactions.

The record also covers all internal and external checks, audits, investigations and other proceedings that users of EU public funds are subject to, to assess the legality and regularity of the transactions underlying the implementation of the EU budget. The audit and control activities can be conducted at any time during the performance of the programme/project, as well as thereafter, and can concern any aspect (including beneficiaries; projects; systems; transactions etc.), depending on the needs of the granting authority. The audit and control activities may be carried out on documents; and/or on the spot in any place where the funds in question are managed or used; the geographical scope is therefore worldwide.

The record covers both external and internal data subjects.

The Commission and the Global Health EDCTP3 JU may use limited personal data obtained through the Portal for the purposes of monitoring, evaluating, and improving their programmes and initiatives; to account for these in front of the legislative authorities (the European Parliament and the Council of the European Union); to comply with their public reporting obligations; and as a source of information for policy-making. A limited subset of the personal data may be processed for communication purposes, as per the rules of each call for proposals / contest for prizes.

The purposes for further processing are the following: archiving in the public interest, scientific or historical research purposes and statistical purposes. The safeguard in place to ensure data minimization is pseudonymisation.

To this end, the Global Health EDCTP3 JU as Controller implements the following tasks:

- a) Definition of purposes and design of the related means (business processes and IT systems) for processing operations related to the management of contracts via the Single Electronic Data Interchange Area (SEDIA) corporate initiative;
- b) Management of the entire life cycle of related personal data processing operations:
 - a. Application and selection phase: Unser Helpdesk services; Proposal submission; Proposal evaluation; Approval of selected proposals' lists; Evaluation support.
 - b. Grant Agreement (GA) management: GA preparation, signature and amendments;
 - c. Project management: meetings with applicants and beneficiaries, processing advanced/intermediate/final payments, management of project deliverables, reporting activities, monitoring.

- d. Data collection and analysis: collection and reporting on socio-economic data or any other aspects;
- e. Publication, dissemination and exploitation of results: publication of project information, dissemination of project results and deliverables, exploitation and valorisation of project outcomes, follow-up of publications and patents generated by projects or prizes, communication activities.
- f. Evaluation of EU Funding Programmes: assessment of the impact of EU funding programmes, evaluation of effects on researchers and other participants.
- g. Research Networking and Community Building: research networking activities, networking among beneficiaries, fellows, researchers, and staff, implementation of alumni and community-building services.
- h. Publication of Personal Data: publication of personal data of staff members of applicants and beneficiaries on the internet, dissemination of such data through other communication, dissemination, exploitation, and networking channels related to EU-funded projects and programmes.
- i. Design, Monitoring, and Policy Development: design of EU funding programmes, monitoring and evaluation of EU funding programmes, policy development activities.
- j. Publication of Beneficiary Information: publication of a limited set of beneficiaries' personal data on CORDIS, Europa websites, other dedicated webpages; dissemination of such information through other appropriate channels.
- k. Checks, Audits, and Investigations: Internal and external checks, audits, investigations and related proceedings, verification of the legality and regularity of transactions funded through the JU budget.
- l. Exchange of Audit Information: exchange of project lists between contracting authorities for audit purposes, support for the lifecycle management of audits, extension of audit findings to non-audited periods and related projects, sharing summaries of audit conclusions.
- m. Information Search and Verification Tools: searching and visualising information about grant participant, use of text-similarity tools to identify potential plagiarism in submitted documents.

4. Categories of data subjects

- **Internal to the organisation**

Data subjects are active or former Global Health EDCTP3 JU staff who respond to calls for prizes and/or register through the Portal for the purposes described in this record.

Active Global Health EDCTP3 JU staff are also administrators of the processes described in this record.

- **External to the organisation**

Data subjects working for the legal entities which request (applicants) or receive (beneficiaries) funding through the Global Health EDCTP3 JU programme within the scope of the concerned actions. Personal data processing operations may relate to any other persons whose data is submitted to the Global Health EDCTP3 JU in the context of grant management, preparation, implementation and follow-up.

5. Which personal data do we collect and further process and on which legal grounds?

The personal data collected in our processes falls into several key categories, including:

Identification data

- first name, middle name & last name (including maiden name)
- gender
- title
- nationality
- Participant Identification Code (PIC) (when the participant is a natural person)
- other person identifiers linked to other sources (e.g. ORCID ID or Researcher ID)
- ID document number (passport/other)

Contact data

- e-mail
- contact (phone) numbers – including all types, such as personal, business, GSM, landline, fax, voice over IP etc.
- personal address(es) submitted (such as origin, permanent, current, previous residences)

Employment and career related data

- current employment status (employer's name and address; employer's type; employer's website; department; function/position; staff category);
- employment contracts, salaries, timesheets, missions/meetings minutes/reports, supporting documents related to travel costs;
- career stage.

Financial data of natural persons (for entry into and monitoring of relevant type of legal commitment and all linked financial transactions): bank account related data (such as account number, name and address of the holder, name and address of the bank, available funds)

Data necessary for management of procedural/evaluation/performance related aspects

- eligibility criteria related personal data and programme related accreditation data
- exclusion criteria related personal data (including declaration on honour and extracts from judicial records for natural persons)
- selection criteria related personal data
- award criteria related personal data
- performance related personal data linked to legal commitment with the JU (such as quality of performance of participant (if a natural person) or participant's staff during the execution of relevant legal commitment with the JU, information linked to participation to meetings)
- any other procedural (application, evaluation process related, project reporting and monitoring etc.) data that is of personal nature and linked to points listed above (including role in the project)
- data related to disadvantaged status or vulnerable status (e.g. social and economic situation (poor family and background; from disadvantaged area; status of refugee or displaced person))

Authentication and access data:

- EU Login credentials
- IP address

- security data/log in files

Sensitive personal data:

- information related to health conditions in relation to claims (e.g. for special allowances or triggering a change for a contractual condition (suspension, amendment etc.));
- information related to fewer opportunities (e.g. discrimination or social obstacles), triggering a change for a contractual condition (suspension, amendment, termination, etc.)

Other incidental and unsolicited data:

- third party personal data: the supporting documents submitted by the participant may contain personal data of third persons (such as other experts mentioned in proposals, board members etc.) not necessary for purposes of processing in business areas of the Portal
- data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and sexual orientation - if these data appear in the documents (CVs, ID documents, other documents) provided by the data subjects without the request of the JU
- (references to) personal data freely available on social networks and the Internet

Search related data of logged in users: search history and recommendations preferences.

The data categories listed above are exhaustive, but the listed data fields are non-exhaustive.

The processing operations carried out in this context are necessary and lawful under the following legal basis: Regulation (EU) 2018/1725 and more specifically Article 5.1(a) Regulation (EU) 2018/1725 “processing is 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;”

The specific legal basis for processing the above data can be found in the following articles:

- 1) Council Regulation (EU) 2021/2085 establishing the Global Health EDCTP3 JU, in particular Articles 5(2)(a) and 24(1);
- 2) Regulation (EU) 2021/695 of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe, in particular Article 29;
- 3) Articles 43 and 45 of the Global Health EDCTP3 JU Financial Rules;
- 4) Title VIII of the EU Financial Regulation (grants), in particular Articles 242 and 243.

By adhering to these frameworks, we ensure that all personal data is processed lawfully, transparently, and with respect to the rights and privacy of the individuals involved.

The processing operation concerns one or more of the following **special categories of data**:

- **Data concerning health**

Information for obtaining special allowances (long-term leave allowance and/or special needs allowance), when claiming their costs as beneficiaries, in line with point **5.7 Special allowances: the long-term leave allowance and the special needs allowance** of the Marie Skłodowska-Curie (MSCA) Financial Guide ([horizon-msca-financial-guide_en.pdf](#)).

The reason under Article 10(2) allowing the processing of the special categories of data is that the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.

- **Data related to ‘criminal convictions and offences’**

In line with Art 138(1) of the Financial Regulation (September 2024 recast), in exceptional cases, personal data related to criminal convictions and offences is processed only if included in the evidence that may be requested by the Authorizing Officer Responsible (AOR) to prove the absence of exclusion of the entity or related persons. Where personal data are concerned, the AOR shall, in accordance with Regulation (EU) 2018/1725, inform the person or entity concerned of their rights under the applicable data protection rules and of the procedures available for exercising those rights.

The information referred to in paragraph 1 of Article 142 of the Financial Regulation shall not be published where a natural person is concerned, unless the publication of personal data is justified by exceptional circumstances, inter alia, by the seriousness of the conduct or its impact on the financial interests of the Union. In such cases, the decision to publish the information shall duly take into consideration the right to privacy and other rights provided for in Regulation (EU) 2018/1725.

The Global Health EDCTP3 JU will not actively process the other incidental and unsolicited special categories of personal data listed under above.

6. Transfer to a third country or international organisation

• Inside the JU

Authorised staff of the JU, based on the need-to-know principle.

• Outside the JU

Description of the indicated recipients of the data

Based on the need-to-know principle:

- any legal person that is an EU entity processing personal data as described in the corporate privacy statement or is entitled by law (authorised staff of the EU entities acting as joint-controllers);
- any natural/legal person with whom the Global Health EDCTP3 JU is under regulatory duty; or who needs the data in the public interest, if the recipient needs the data for legitimate performance of tasks within its competence (such as: authorised persons representing the Member States; EEA countries; associated countries, EDCTP Association and its member countries).
- any natural/legal person who has a contractual relationship with a joint-controller and who is working on behalf of and under the responsibility of that joint-controller for the purposes of performing the tasks of the relevant contract, or has a need-to-know stemming from the contract (external experts; authorised staff of contractors acting as processors for a specific processing operation (external auditors; event organisers etc.))

Categories of the data recipients:

The categories (one or more) of the data recipients:

- A natural or legal person
- Agency
- Any other third party: as described above.

The following categories of personal data are to be made public:

- In accordance with Art 38 FR, certain information on recipients of EU funds is published annually on the Financial Transparency System; in the Official Journal of the European Union; and/or on the applicable website of the Commission.
- Partner organisations chosen by the participant and included in participant's grant;

Pursuant to Art 3(13) of Regulation (EU) 2018/1725, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or MS law shall not be regarded as recipients; the processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

Disclosure to recipients is exercised in compliance with the principles of “necessity” and “data minimisation”. The natural persons further abide by statutory obligations and, when required, additional confidentiality agreements. Recipients are reminded of their obligation to process the personal data provided to them only for the purposes for which they were transmitted.

7. How long do we retain your personal data?

The administrative time limit(s) for keeping the personal data per data category:

1. Data category: Personal data of staff of applicants - proposals not leading to a grant (including outdated versions or withdrawn proposals): Retention period 5 years after the end of the year of the call submission deadline.
2. Data category: Personal data of staff of beneficiaries - granted proposals, grant agreements, deliverable reports, and their related transactions: Retention period 10 years after the end of the year in which either the grant action/agreement was closed or the last financial/accounting operation of the grant agreement took place (whichever is later).
3. Data category: Limited personal data of the scientific staff of the applicants and beneficiaries (title; first and last name; researcher ID; email) - for scientific/historical research and statistical purposes. Retention period 25 years after: - the end of the year of the call submission deadline (for the scientific staff of the applicants) - the end of the year in which either the grant action/agreement was closed or the last financial/accounting operation of the grant agreement took place - whichever is later (for the scientific staff of the beneficiaries)

Personal data is stored for longer periods as it will be processed solely for archiving purposes in the public interest, scientific and historical research purposes and statistical purposes, after implementation of the appropriate technical and organisational measures required by Regulation (EU) 2018/1725 in order to safeguard the rights and freedoms of the scientific staff of the applicants and beneficiaries. Up to the closure of the call for proposals, the data subjects can exercise their rights of access, rectification, or erasure, in compliance with the Regulation (EU) 2018/1725, without contacting the Controller.

The retention period of the special categories of personal data is identical with the retention of the personal data as mentioned above. Data related to 'criminal convictions and offences': any extracts from judicial records provided by the data subjects are not kept longer than 2 years after the end of the year in which the particular procedure was accomplished.

8. How do we protect and safeguard your personal data?

The Global Health EDCTP3 JU implements the following technical and organisational measures to safeguard your personal data: Staff dealing with this processing operation is designated on a need-to-know basis; Data kept according to the security measures adopted by the JU; Access control and technical measures such as physical locks and/or secure connections and firewalls; Obligation of confidentiality of the staff; Automated system (Grants management); Appropriate technical and organisational security measures, giving due regard to the risks inherent in the processing and to the nature of the personal data concerned.

All personal data in electronic format (emails, documents, databases, uploaded batches of data etc.) are stored on the servers of the Global Health EDCTP3 JU (with automatic backup and recovery mechanisms, as defined in the disaster recovery plan).

All Commission IT systems are compliant with the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission. In addition, external contractors run IT systems on behalf of the Commission in line with the provisions of Regulation 2018/1725. They act only upon written instructions from the Controllers and undertake to adopt appropriate technical and organisational security measures having regard to the risks inherent to the processing and to the nature of the personal data concerned.

Appropriate technical and organisational security measures are in place to address all data processing risks (preventing unauthorised access, reading, copying, alteration or deletion of personal data etc.).

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 personal data solely to authorised persons with a legitimate need-to-know for the purposes of this processing operation. Access to data is only available to registered users as approved by their hierarchy through a separate access control module managed by the Controller (EU Login and SECUNDA+), and according to the need-to-know principle. The security module logs which user has requested access to the system, together with the date and timestamp. Authentication is based on the EU Login mechanism. The access rights for the accounting system are defined via the accounting system security modules. The authentication to the accounting system, the document management system etc. is accomplished via the EU Login mechanism, which is designed to increase the security of Commission's IT systems.

9. Transfer to a third country or international organisation

Transfer outside of the EU/EEA may occur in the context of: evaluation/monitoring of grants/prizes by experts from non-EU/EEA countries; sharing of project information with EDCTP Association and further on with its member countries. The transfer is necessary for the JU to: carry out its budget implementation tasks; comply with its obligations under the applicable legislation and the agreements with the beneficiaries. No countries are automatically excluded by data transfers.

Data is transferred to international organisations, when necessary for the Commission to: carry out its budget implementation tasks; comply with its obligations under the applicable legislation and the agreements with the beneficiaries. The legal base for the data transfer is the European Commission's adequacy decisions (Article 47) or the transfer is subject to appropriate safeguards (Article 48.2) based on the standard data protection clauses adopted by the European Commission.

Derogation(s) for specific situations in accordance with Article 50.1 (a) - (g) also may apply. In the absence of an adequacy decision, or of appropriate safeguards, transfer of personal data to a third country or an international organisation is based on the following condition(s):

- The data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data subject due to the absence of an adequacy decision and appropriate safeguards;
- The transfer is necessary for the performance of a contract between the data subject and the entity of the operational controller or the implementation of pre-contractual measures taken at the data subject's request;

- The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the entity of the operational controller and another natural or legal person.

For those derogations, explicit consent (requested by email, via EUSurvey etc.) is obtained and managed by the responsible operational controller in full compliance with the Regulation (EU) 2018/1725. The transfer is necessary for the performance of a Grant Agreement or a prize between the data subject and the controller. The transfer is necessary for the conclusion or performance of a contract (e.g. with evaluators/monitors) concluded in the interest of the data subject between the controller and another natural or legal person.

10. What are your rights and how to exercise them?

As 'data subject' you have, under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725, specific rights. In particular:

- You have the right to request access to all personal data processed by us pertaining to you.
- You have the right to rectification, i.e., to ask that any personal data pertaining to you that are inaccurate, be corrected.
- You have the right to withdraw your consent for processing of your personal data.
- You have the right to erasure, i.e., to request that personal data pertaining to you be deleted if these data are no longer required in the light of the purposes outlined above in Heading 3.
- You have the right to restriction instead of deletion, i.e., to request that we limit the processing of your personal data.
- you have the right not to be subject to a decision based solely on automated processing of data, including profiling, if such decision has legal effect on him or her, except for certain situations, such as entering a contract (as required by articles 14-16 & 24 of Regulation (EU) 2018/1725).
- You have the right to data portability, i.e., to receive from us in a structured, commonly used, and machine-readable format all personal data you have provided to us if the processing is based on your consent or a contract with you and the processing is carried out by automated means.

Possible restrictions as laid down in Article 25 of the Regulation (EU) 2018/1725 can apply based on [Global Health EDCTP3 JU Governing Board decision n°18/2023](#) 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 Global Health EDCTP3 JU, in particular Articles 3(1)(k).

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Global Health EDCTP3 JU's Data Protection Officer by post at the following address TO 56, 1049 Brussels or by email at data-protection@global-health-edctp3.europa.eu.

The European Data Protection Supervisor (EDPS)

If you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Global Health EDCTP3 JU, as a data subject, you have a right to recourse to the European Data Protection Supervisor (EDPS) at any time by e-mail to edps@edps.europa.eu or a letter to the EDPS postal address marked for the attention of the EDPS DPO:

European Data Protection Supervisor
Rue Wiertz 60
B-1047 Brussels
BELGIUM

For more information on the EDPS, please consult their website: <https://www.edps.europa.eu>.

11. Where to find more detailed information?

The Global Health EDCTP3 JU's Data Protection Officer (DPO) publishes the Register of all processing operations on personal data by the Global Health EDCTP3 JU on the website. The Register can be found [here](#).

This specific processing operation has been included in the Global Health EDCTP3 JU Public Register with the following Record reference: DPO-02-03.