

## 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 the external audits and ex-post controls

**Record reference:** DPO-04-01

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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 the external audits and ex-post controls in Global Health EDCTP3 JU, 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 within the framework of the external audits and ex-post controls.

## 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 [Info@global-health-edctp3.europa.eu](mailto:Info@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](mailto:data-protection@global-health-edctp3.europa.eu).

In addition to Global Health EDCTP3 JU, the European Commission is a joint controller for the management and procurement procedures and grant applications (using Sedia). Please find the European Commission privacy notices below:

- Horizon Europe external audits and controls, published in the online public Register of the DPO under reference number [DPR-EC-03326](#);
- Processing of personal data when the European Commission carries out external audits and controls, published in the online public Register under reference number [DPR-EC-04466](#);

The Audit management system (Belgium) is acting as processor.

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

Your data is collected and managed for the sole purpose of preparing and communicating the audit reports by the external auditors. Specifically, personal data is collected in the conduct of checks and financial controls of grant agreements or service contracts aimed at verifying beneficiary's or contractor's or subcontractors' or third parties' compliance with all contractual provisions (including financial provisions). The purpose of the control is to check that the action and the provisions of the grant agreement or contract are being properly implemented and to assess the legality and regularity of the transaction underlying the implementation of the EU budget.

Your personal data will not be used for an automated decision-making, including profiling.

#### **4. Which are data subject categories concerned?**

This data processing concerns the following data subject categories:

- Tenderers and applicants' data (in case of legal entities, their representatives).
- Global Health EDCTP3 JU External contractors
- Service providers of Global Health EDCTP3 JU

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

In order to carry out this processing operation Global Health EDCTP3 JU collects the following categories of personal data:

- Educational
- Financial information
- Professional
- Personal details

We process your personal data because the processing operations carried out in this context are necessary and lawful under the following legal basis: Article 5.1(b) Regulation (EU) 2018/1725.

The necessity is foreseen by the following legal and administrative acts:

- Council Regulation (EU) 2021/2085 establishing the Global Health EDCTP3 JU, in particular Articles 26, 30 and 31
- Financial Rules of Global Health EDCTP3 JU, in particular Chapter 4, Chapter 7 (Articles 40 and 52) and Chapter 9
- Articles 70 and 71 of the EU Financial Regulation
- Governing Board decisions n°11/2023 on internal control framework and n°25/2023 on adopting the internal audit capability and appointing the audit liaison officer.

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.

#### **6. Who has access to your personal data and to whom is it disclosed?**

##### **6.1 Holders of access rights**

The accessibility of personal data is strictly controlled based on the type of data and the purpose for which it is processed. Access to this data is granted solely on a need-to-know basis, ensuring that only authorized personnel within:

- Global Health JU Executive Director
- Global Health JU Management
- Global Health JU Human Resources team
- Global Health JU Administration & Financial Support staff
- Global Health JU Internal Control and Audit Manager
- Global Health JU Governing Board.

This policy helps to protect the confidentiality and integrity of your data, minimizing the risk of unauthorized access.

## 6.2 Recipients of the data

Other recipients may include:

- Commission and its services:
  - Accounting Officer of the European Court of Auditors
  - OLAF, European Commission Internal Audit Service
  - European Data Protection Supervisor
- *Intra* and *extra-muros* external service providers (Global Health EDCTP3 JU contractors)
- Global Health EDCTP3 JU Executive Director
- Global Health EDCTP3 JU Staff members: Internal Control and Audit Manager, Head of Administration & Finance, Data Protection Officer, Administration and Finance Support team
- Global Health EDCTP3 JU Governing Board.

## 7 How long do we retain your personal data?

Personal data is retained for a period of 10 years after the closure of the audit for all types of data processed regarding audits, and 5 years after the closure of the control for all types of data processed regarding ex-post controls.

## 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:

- Data kept according to the security measures adopted by the European Commission
- Staff dealing with this processing operation is designated on a need-to-know basis.

Access on a need-to-know basis and measures are also adopted by OLAF.

To know more about the privacy policies see:

- H2020 external audits and controls, published in the online public Register of the DPO under reference number [DPR-EC-03326](#);
- Processing of personal data when the European Commission carries out external audits and controls, published in the online public Register under reference number [DPR-EC-04466](#)
- The policies are published on the Global Health EDCTP3 JU website: [https://www.global-health-edctp3.europa.eu/about-us/legal-notice-and-privacy\\_en](https://www.global-health-edctp3.europa.eu/about-us/legal-notice-and-privacy_en)

## 9 Transfer to a third country or international organisation

The Global Health EDCTP3 JU process your personal data within the European Economic Area (EEA).

## 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 EUDPR).
- 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 Regulation 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)(d) and (e).

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 Data Protection Officer by post (postal address TO-56, B-1049, Brussels, Belgium) or by email to [data-protection@global-health-edctp3.europa.eu](mailto: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](mailto: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 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-04-01.