

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 in the context of the access to documents

Record reference: DPO-07-01

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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). The 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 access to documents 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 access to documents in Global Health EDCTP3 JU.

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 the Global Health EDCTP3 JU, located 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.

The Global Health EDCTP3 JU has appointed a Data Protection Officer (DPO). The task of the DPO is to ensure, in an independent manner, that the 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 the Global Health EDCTP3 JU can be contacted by post TO 56, 1049 Brussels, Belgium or by email at data-protection@global-health-edctp3.europa.eu.

For the use of the IT corporate tools Hermes-Ares-NomCom in the context of the document/record and archive management, DG DIGIT of the European Commission is joint controller is, providing the use of the tools, please see the relevant data privacy notice [here](#) in the DPO register.

In addition, Global Health EDCTP3 JU relies upon the services of Microsoft Ireland as Cloud Service Provider (CSP) and Inetum as Licensing Solutions Provider (LSP), acting as processors. The use of M365 is based on licensing agreement between the Global Health EDCTP3 JU and Microsoft. Please find [here](#) the relevant data privacy notice.

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

Your personal data is collected and processed to ensure appropriate treatment of any external person's requests for access to public documents of the Global Health EDCTP3 JU. Specifically, this processing takes form of the receipt of the request, the analysis of the request, taking a decision on the request, and informing the applicant of the decision and acknowledgment of receipt.

4. Categories of data subjects

This data processing concerns the following data subject categories: any natural person acting on a private basis or on behalf of a legal person submitting a request for access to Global Health EDCTP3 JU (public) documents.

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:

- Professional data, such as, job title, professional experience
- Personal details, such as first name, last name
- Contact details, such as your e-mail address, postal address, country and (mobile) telephone number;

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 act:

- Regulation (EC) 1049/2001 of the European Parliament and of the Council regarding public access to European Parliament, Council and Commission documents
- Council Regulation (EU) 2021/2085 of 19 November 2021 establishing the Joint Undertakings under Horizon Europe, including Global Health EDCTP3 JU, in particular Article 34
- Governing Board decision on implementing rules on access to documents. Service Level Agreement between Global Health EDCTP3 JU and European Commission.

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 EDCTP3 JU Executive Director
- Global Health EDCTP3 JU Legal and Data Protection Officer(s)
- Global Health EDCTP3 JU Document Access Coordinator
- Global Health EDCTP3 JU Management

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:

- Global Health EDCTP3 JU Executive Director
- Global Health EDCTP3 JU Staff:
 - Legal and Data Protection Officer(s)
 - Global Health EDCTP3 JU Document Access Coordinator
 - Global Health EDCTP3 JU Management

The accessibility of personal data is strictly controlled based on the type of data and the purpose for which it is processed. This policy helps to protect the confidentiality and integrity of your data, minimizing the risk of unauthorized access.

7 How long do we retain your personal data?

The retention period for personal data is of 5 years after the closure of a casefile.

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
- Access control and technical measures such as physical locks and/or secure connections and firewalls.

9 Transfer to a third country or international organisation

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

For any potential international data transfers and applicable transfer mechanisms for the use of Microsoft services, please visit the privacy statement of Global Health EDCTP3.

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 object to the processing of personal data if the processing by us is necessary for the performance of a task carried out in the public interest, unless if we demonstrate compelling legitimate grounds which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.
- 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)(f) and (g).

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

This specific processing operation has been included in the GH EDCTP3 JU Public Register with the following Record reference: DPO-07-01.