

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 registration, selection and management of external experts (selected and non-selected experts)

Record reference: DPO-02-02-a) and DPO-02-02-b)

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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 registration, selection and management of external experts (selected and non-selected experts), 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 the registration, selection and management of external experts (selected and non-selected experts).

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.europea.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: Independent expert management, published in the online public Register of the Data Protection Officer of the Commission under reference number [DPR-EC-00915](#)

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

Your data is collected and processed for the establishment of a database of prospective independent experts to assist with tasks managed by the Global Health EDCTP3 JU. The processing operations performed by the controller include collection, storage and evaluation of personal data of the experts.

The purpose of the processing is the registration, selection and management, including reimbursements of expenses and payment, where appropriate, of experts appointed by the Global Health EDCTP3 JU to advise on or assist with the implementation of EU/JU funding, in particular:

- a) Evaluation of proposals, tenders, and prizes;
- b) Monitoring of the implementation of actions carried out under the JU programme;
- c) Implementation of JU policies and programme;
- d) Evaluation of JU programme;
- e) Design of the JU policies.

The processing operations performed by the controller include collection, storage and evaluation of personal data of the experts.

By managing these data carefully, the process ensures compliance with relevant regulations and standards, while striving to maintain transparency, efficiency, and impartiality in selecting qualified individuals for these roles.

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

- a) Establishment and maintenance of a database of experts and delegated actors (persons appointed and empowered by the experts to perform data entries and administrative tasks on behalf of the experts) to assist the Controller with:
 - evaluation of proposals, tenders and prizes;
 - design of policies;
 - opinions and advice in specific cases; and
 - monitoring and review of actions;
- b) Selection of experts;
- c) Management of expert contracts;
- d) Management of reimbursement of expenses (reimbursement or contributions to travel, accommodation, and daily allowance, etc.);
- e) Payment of fees, where applicable;
- f) A limited subset of personal data might be used for related communication activities, such as communication actions on the EU Funding & Tenders Opportunities Portal (hereinafter "the Portal") updates and service-related initiatives or surveys;
- g) Some processing operations implemented by other European Commission internal services (e.g. payments within the central Commission accounting system databases by the Directorate-General for Budget (DG BUDG); Community Research and Development Information Service (CORDIS) publications by the Publications Office) within the scope of their relevant records¹.

Furthermore, the Controller will process personal data of the expert's appointed delegated actor in order to enable the delegated actor's access to the concerned expert's profile on the Portal, allowing the delegated actors to perform their delegated tasks.

The purposes for further processing are the following:

- Scientific or historical research purposes
- Statistical purposes

In such circumstances, personal data will be kept in an anonymized or encrypted form.

¹ DPR-EC-00301 of DG BUDG; DPR-EC-00452 of the Publications Office (OP); DPR-EC-00655 of Human Resources and Security (HR).

The personal data of the registered individuals will not be used for any automated decision-making. Your data may be used to train and test AI-driven models for enhancing and refining the expert data base (e.g. to suggest matching profiles to the EU services, see [FTP AI information](#)).

Upon request from the relevant implementing body, and subject to a case-by-case evaluation in accordance with the provisions of this record, the European Commission may authorize the further processing of experts' personal data for the purposes of implementation of other programmes or initiatives. Access rights to the experts' database for the purposes of implementation of any new programmes authorised pursuant to this paragraph shall respect and be consistent with the data subjects' choices regarding the types of entities, as expressed on the Portal.

In addition to these processing operations, the European Research Executive Agency (REA) provides administrative and logistical support to the Controller, including the contracting and payment of experts. Modalities for such collaboration are outlined in the Commission Decision C(2021)952 of 12 February 2021 delegating powers to REA (with a view to the performance of tasks linked to the implementation of Union programmes in the field of Research and Innovation, Research of the Fund for Coal and Steel and Information Provision and Promotion Measures concerning Agricultural Products comprising, in particular, implementation of appropriations entered in the general budget of the Union), and in particular in its Art 4 and Annex VIII.

The regime applicable to remunerated experts is provided by Article 248 of the Financial Regulation (FR).

Types and roles of experts: eExperts targets the following types of experts (linked to the management of grants and specific advice within the meaning of Art 248 FR):

- Evaluators, who are contracted for the evaluation procedure for grants, prizes, tenders, or financial instruments. Evaluators can be assigned specific roles, as Rapporteurs, (Vice) Chairs, Quality checkers, Cross-readers, Observers, Ethics evaluators;
- Monitors, who are contracted for monitoring during project implementation (e.g. for assessment of interim, periodic and final reports). Monitors can also be assigned the role of Ethics monitors;
- Experts participating in the advisory bodies of the JU;
 - Individual experts, advising the institution on *ad hoc* files.

Statistics on experts' nationality, gender, field of expertise (for example) may be generated during the implementation of the EU Framework Programmes and also after their end, in a form that safeguards the data subjects' anonymity. In addition, statistics on experts with contracts (first and last name, candidature number, accounting system references, number of days worked, fees paid) may be generated during the implementation of the programmes, to comply with the rules on rotation of the experts. These statistics will be retained for the duration of the EU Framework Programmes.

4. Categories of data subjects

- **Internal to the organisation**

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

Active JU staff are also administrators of the processes described in this record (Authorising Officers select experts from the database for certain award procedures for which they are responsible).

- **External to the organisation**

Data subjects are natural persons who respond to calls for expression of interest and/or register as experts through the Portal:

- (i) External experts registered on the Portal to assist the Global Health EDCTP3 JU for the purposes described in this record;
- (ii) Delegated actors (persons appointed and empowered by the external experts to perform data entries and administrative tasks via the Portal on behalf of the external experts).

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, middle and last name (including maiden name);
- gender;
- title;
- personal data contained in different types of identification documents (date and place of birth; nationality; personal (national) identification number);
- expert display name;
- other personal identifiers linked to other sources (ORCID/Researcher ID);
- expert candidature reference.

Contact data

- email;
- contact (phone) numbers (personal; business; mobile/GSM; landline; fax; voice over IP);
- personal address(es) submitted (origin; permanent; current/previous residences).

Education related data

- educational background (names of institutions; titles; qualifications; academic/research records; academic qualifications);
- (areas of) expertise and technical skills;
- language(s) spoken;
- personal data embedded in / stemming from publications.

Employment related data

- current employment status (employer's name and address; employer's type; employer's website; department; function/position; staff category);
- employment history (any previous employment, including career breaks; total number of years of experience; start and end dates of employment periods; link to CV in an outside data source; information related to other former experience, including on former assistance to the EU entities; and peer review experience);
- work assignments / roles given in IT systems and the role(s) of the data subjects in them.

Financial data

- bank account related data (account number; name and address of the holder; name and address of the bank; available funds);
- total amount of fees paid to an expert by the EU entities/Global Health EDCTP3 JU.

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

- eligibility criteria related personal data;
- exclusion criteria related personal data (for a potential suspension of any engagement with nationals of certain countries or representatives of certain public bodies, related organisations, and/or state-owned enterprises);
- selection criteria related personal data;
- performance related personal data linked to the execution of the expert contract with the EU entities (report submission; information linked to participation to meetings);
- any other procedural (application; evaluation process related) data that is of personal nature and linked to points listed above.

Authentication and access data

- EU Login credentials;
- IP address;
- security data / log-in files.

Incidental and unsolicited data

- third-parties personal data (the supporting documents submitted by the data subjects may contain personal data of third-parties (other researchers or experts mentioned in proposals; board members) not necessary for the present purposes of processing);
- data revealing racial/ethnic origin; political opinions; religious/philosophical beliefs; trade union membership; sexual orientation - if these data appear in the documents (CVs; ID documents; other documents) provided by the data subjects.

The data categories listed above are exhaustive, but the listed data fields are not.

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**

A general description of the special categories of data being processed

- Information on temporary/permanent disability submitted by the data subjects in support of claims for special costs;
- Information on health conditions in support of requests for reimbursement of travel costs incurred prior to the health conditions;
- Claims for changing contractual conditions due to health conditions.

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.

Description/additional information regarding special categories of personal data:

Information related to health conditions is relevant for:

- claims for special costs (if an expert's temporary/permanent disability requires them to be occasionally accompanied, the accompanying person is eligible to receive accommodation and daily allowances, and reimbursement of travel expenses); or
- for triggering a change of contractual conditions (contract suspension/amendment).

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

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 staff members have the ability to view or handle the information. This policy helps to protect the confidentiality and integrity of your data, minimizing the risk of unauthorized access.

Based on the need-to-know principle, any EU entity working with the Portal processing operations covered by the Privacy Statement or entitled by law.

- **Outside the EU organisation**

Description of the indicated recipients of the data:

Based on the need-to-know principle, personal data may be shared with:

- Any legal/natural persons with whom the EU entities are under regulatory duty or who need personal data in the public interest or for legitimate performance of tasks within their competence.
- Research institutions (including research funding bodies with a public service mission) participating in the European Research Area (e.g. public research bodies from Member States or Horizon Europe associated countries; entities set up involving the EU in joint research programmes with Member States).
- Only for (ethics) monitors: the coordinator/beneficiaries of EU/JU Funded projects.

Categories of the data recipients:

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

- A natural or legal person
- Agency

Description of the indicated categories of data recipients:

- Research institutions (including research funding bodies with a public service mission) participating in ERA (e.g. public research bodies from MS or HE associated countries; entities set up involving the EU in joint research programmes with MS).
- Coordinators/beneficiaries of EU Funded projects.
- EU entities.

Who has access to which parts of the data:

Research institutions (including research funding bodies with a public service mission): full EU database of experts.

Coordinators/beneficiaries of EU/JU funded projects: name and contact details of (ethics) monitors.

Comments/additional information on data recipients:

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

- In accordance with Art 38 FR, information about the EU expert contracts above EUR 15 000 (name, address/region and amount) are published yearly on the Financial Transparency System (in line with the record on the Financial Transparency System).
- The names and the area of expertise of the experts who evaluated proposals are published annually on the Portal.
- The names of experts who are jury members for prizes are made public on the prize website.

7. How long do we retain your personal data?

The administrative time limits for keeping the personal data per data category:

1. Data category: All personal data of contracted experts (files regarding the management of expert contracts and expert pools/scopes, covering the selection and management, including reimbursements of expenses and payments, where appropriate), with the exception of personal data related to the Legal Entity and Bank Account files: Retention period 10 years after the end of the MFF during which the legal commitment was signed.
2. Data category: Personal data of unsuccessful (not contracted) experts: Retention period 5 years after the end of the MFF during which the experts' list was established.
3. Data category: Personal data of experts' delegated actors: Retention period Identical with the retention period applicable to the personal data of the respective delegating expert
4. Data category: Personal data related to the Legal Entity and Bank Account files of internal experts: Retention period 10 years after the date of recruitment

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.

In particular, 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. For authorised staff, access to the EU experts database is provided through the IT systems for experts.

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 following measures are implemented to ensure the security and privacy of personal data when training the internal machine learning model to support decision-making processes within EU institutions:

- Data Conversion: the personal data is converted to a numerical form prior to its use in machine learning model training;
- Data Alteration: following the conversion process, the data undergo additional alterations to render the restoration of the original information impossible without incurring significant loss of information;
- Pseudonymisation: the data alteration process employs pseudonymisation techniques (such as encryption, shuffling, and hashing) to protect the personal data.

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, Expert area in the Portal, IT systems for experts etc. is accomplished via the EU Login mechanism, which is designed to increase the security of Commission's IT systems.

The Expert area in the Portal provides a unified front-end for expert-related services.

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

Additionally, anonymous or encrypted data can be retained for a longer period for statistical, scientific or historical purposes.

9. Transfer to a third country or international organisation

Countries to which data is transferred:

Experts from non-EU/EEA countries that are tasked with evaluating/monitoring a project/prize application/tender together with EU/EEA experts. Certain research institutions (including research funding bodies with a public service mission) from non-EU/EEA countries (e.g. public research bodies from Horizon Europe associated countries: Updates on the association of third countries to Horizon Europe - European Commission). In case of (ethics) monitors, the coordinator/beneficiary of EU Funded projects from non-EU/EEA countries.

Transfer to international organisation(s):

- **The legal base for the data transfer:** Transfer on the basis of the European Commission's adequacy decision (Article 47)
- **The specific adequacy decision:** Data protection adequacy for non-EU countries (europa.eu)
- Transfer subject to appropriate safeguards (Article 48.2), Standard data protection clauses adopted by the Commission

There are derogation(s) for specific situations in accordance with Article 50.1 (a) - (g) apply(ies)

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 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 important reasons of public interest
- The transfer is necessary for the establishment, exercise or defense of legal claims
- **Description of the indicated condition(s) that apply(ies) for the derogation(s):** The transfer is necessary for the performance of a contract between the expert and the contracting authority (expert contract). The transfer is necessary for the performance of a task carried out in the public interest (award and management of grants/prizes/procurements/contribution agreements). The transfer is necessary for the compliance with legal obligations to which the Controller is subject.
- **Comments/additional information on international data transfers:**
The Operational Controllers may transfer personal data to recipients in a third country in accordance with Regulation (EU) 2018/1725.
The transfer of personal data is likely to occur in the context of the evaluation of proposals / prize applications / tenderers together with other experts from non-EU/EEA countries and is necessary for the Controller to carry out its budget implementation tasks and to comply with its obligations under the applicable legislation and the contracts with the experts.

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-02-02-a) and DPO-02-02-b).