



European Research Council  
Executive Agency

Established by the European Commission

## RECORD OF PERSONAL DATA PROCESSING

Art. 31 of the REGULATION (EU) 2018/1725 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (henceforth the "Data protection regulation")

Record n°

DPO 65 - 2025

*In accordance with Article 31 of the data protection regulation, individuals whose personal data are processed by the Executive Agency in any context whatsoever are to be protected with regard to the processing of personal data and the Executive Agency has to keep records of their processing operations.*

*This record covers two aspects:*

- 1. Mandatory records under Art 31 of the data protection regulation (recommendation: make the header and part 1 publicly available)*
- 2. Compliance check and risk screening (initial; part 2 is internal only to the Agency, not published)*

*The ground for the record is (tick the relevant one):*

- ☒ *Regularization of a data processing operation already carried out*
- ☐ *Record of a new data processing operation prior to its implementation*
- ☐ *Change of a data processing operation.*

### (This part may be public) Submission and Evaluation of Proposals

1	Last update of this record if applicable	N/A
2	Short description of the processing	The record covers the processing of personal data that the ERCEA collects via the EU Funding & Tenders Portal (the 'Portal') for the purpose of the processing operation related to the submission and evaluation of proposals and the personal data collected via the 'Calls' Functional Mailbox for the purposes of assessment of eligibility and obvious clerical issues. The record also covers the registration procedure to create a user profile for the use of the Portal and the validation procedure if a proposal is awarded a grant.

**(This part may be public)**  
**Part 1 - Article 31 Record**

<b>3</b>	<b>Function and contact details of the controller</b>	ERCEA Director <a href="mailto:ERCEA-B2-CALL-COORDINATION@ec.europa.eu">ERCEA-B2-CALL-COORDINATION@ec.europa.eu</a>
<b>4</b>	<b>Contact details of the Data Protection Officer (DPO)</b>	ERC-DATA-PROTECTION@ec.europa.eu
<b>5</b>	<b>Name and contact details of joint controller (where applicable)</b>	<p>For the managing of the IT tool: DG RTD DG DIGIT</p> <p>For the validation of the legal entities: REA – Central Validation Service of the European Research Executive Agency</p> <p>The contact details and the list of the other joint controllers, where applicable, can be found <a href="#">here</a>.</p>
<b>6</b>	<b>Name and contact details of processor (where applicable)</b>	Experts contracted by ERCEA are the processors for the purpose of evaluation of the submitted proposals.
<b>7</b>	<b>Purpose of the processing</b>	<p>The processing operation is necessary for the purpose of creation of a user profile for the use of the Portal, assessment of documents which include personal data to assess submissions of proposals for ERCEA grants as made available on the Portal and further evaluation by the ERCEA to ensure compliance with the requirements and evaluation of the submitted proposals by external experts, and validation procedure to comply with the Financial Regulation and to ensure that: (i) only verified entities can enter into financial relations with the EU, and (ii) to avoid legally invalid contracts.</p> <p><b>I. User Profile – Portal</b></p> <p>One of the preconditions to submit a research proposal for evaluation for potential award of the ERCEA grants is the creation of a user profile on the Portal. The creation of such a user profile will require specific personal data that will be processed for the purposes of creation of the user profile and submission of a research proposal.</p> <p><b>II. Submission and Evaluation</b></p> <p>The proposals are submitted via the Portal which is operated by the Commission, as Joint-Controller. The proposals are submitted by a PI (Principal Investigator), or by a contact person on behalf of the PI, to which the grant may be awarded. The PI, or the contact person submitting the proposal on behalf of the PI, should ensure that all the appropriate consent has been collected, such as but not limited to consent from all participants on their participation and the content of the proposal, and any researchers mentioned in the proposal as participating. Additionally, the applying PI and the applicant legal entity must be registered in the Participant Register on the Portal with access to the electronic submission system and a Legal Entity Appointed Representative must be appointed.</p>

The submission system will carry out basic preliminary verification of the submitted data for the purposes of ensuring that: a) the proposal is complete, b) the data is consistent, c) the submitted documents are malware-free, d) the submitted documents are in the appropriate file format and do not exceed the size limitations,. After finalization of the preliminary verification, the proposal will be allowed for submission.

The submission is only deemed to have occurred when the PI receives an email confirming successful submission. Proposals not submitted before the specified deadline will not be regarded as having been received by the ERCEA and will not be evaluated. If the applicant believes that the proposal was not submitted because of a fault in the submission system, he/she can submit a complaint that will be analysed by the Admissibility and Eligibility Review Committee (AERC). If the Committee confirms the complaint, the proposal will be accepted for evaluation.

The proposals that were successfully submitted will be entered into the database after the call closure. In case more than one version of the proposal are uploaded in the Portal before the call deadline, the submission system will only keep the most recently uploaded one.

It is possible to withdraw a proposal before the deadline of the call through the Portal. For a proposal to be withdrawn after the call deadline a written request for withdrawal must be received by the ERCEA at the latest on the day preceding the panel meeting where a final position on the outcome of the evaluation of that proposal is established. Withdrawn proposals are not subject to resubmission restrictions.

Proposals are archived under secure conditions at all times in compliance with the applicable retention periods, as detailed below.

The PI and the applicant legal entity will receive a confirmation email if the submission is successful. After the call closure, a e-receipt will be made available to the PI and the applicant legal entity via the Portal, containing:

1. The full proposal: title, acronym, unique proposal identifier;
2. The call identifier to which the proposal was addressed;
3. The date and time of receipt (the call deadline).

The PI, or the contact person on behalf of the PI, will be informed of the progress of evaluation of the proposal on the Portal. The ERCEA will not make any further contact with the applicants until after completion of the evaluations. However, specific circumstances, such as:

1. if the ERCEA services need to contact the PI and/or applicant legal entity to clarify matters such as admissibility, eligibility, ethics issues, research integrity or to verify administrative or legal data contained in the proposal;
2. if an obvious clerical error on the part of the applicants is detected at any time;

3. in response to any enquiries or complaints made by the PI and/or the applicant legal entity; the ERCEA may ask applicants to provide missing information or clarify supporting documents as long as such information or clarifications do not substantially change the proposal. The ERCEA will also contact applicants if proposals are subject to interviews.

The ERCEA staff and, if necessary, other Commission staff on a need-to-know basis, will be responsible for evaluation of admissibility and eligibility of the proposal for review by independent external experts. In certain cases the ERCEA may decide to contact the PI and the applicant legal entity in order to clarify a particular issue with the proposal. The PIs and applicant legal entities whose proposals are found to be inadmissible or ineligible are informed in writing of the grounds for such a decision and the available means of redress. The admissible and eligible proposals will proceed to the evaluation by experts phase.

The ERCEA relies on independent external experts to ensure that only proposals of the highest quality are selected for funding. For the purposes of the peer review evaluation, ERCEA independent external experts (peer reviewers) may be requested to perform the following tasks related to the evaluation (with or without remuneration):

1. as a chair-person or vice-chair person of an ERCEA peer review evaluation panel(s), organising the work within their panel, chairing panel meetings, and attending a final consolidation meeting. Chair-persons and vice-chair persons may also perform individual evaluation of proposals first remotely, in preparation for the panel meetings and later in meetings with panel members;
2. as a member of the ERCEA peer review evaluation panel(s), assisting in the preparation of panel meetings, attending those meetings and contributing to the individual evaluation of proposals, first remotely and then in meetings with other experts.

ERCEA may contract additional independent external experts as observers to examine the evaluation process from the point of view of its working and execution.

Independent external experts with the appropriate skills in ethics may be requested to carry out ethics review and ethics monitoring of projects.

Independent external experts may also assist the ERCEA in assessing cases of breach of research integrity (scientific misconduct) during all stages of evaluation, granting and project implementation.

Independent external experts have:

1. appropriate skills and knowledge relevant to the areas of activity in which they will be assisting ERCEA;
2. high level of professional experience in scientific research, scholarship, or scientific management;

3. appropriate language skills required for the tasks to be carried out.

Other skills may also be required.

Independent external experts may come from countries outside of the EU Member states or countries associated to Horizon Europe.

The names of the independent external experts assigned to individual proposals are not made public. However, the list of independent external experts used in a call will be published yearly on Commission websites. The names of experts whose contracts are above EUR 15.000, and the list of panel members will be published on the ERCEA website. Statistics on gender and geographic distribution, will be monitored and reported on an annual basis.

Applicants can request via the Portal the exclusion of up to three experts from evaluating their proposal. Reasons for the exclusion have to be based on clear grounds such as direct scientific rivalry, professional hostility, or a similar situation, which would impair or put in doubt the objectivity of the potential evaluator.

If proposals are subject to remote evaluation, independent experts who were assigned to be observers will have access to all communications between the ERCEA and the peer reviewers and may make contact with some or all peer reviewers to poll their opinions on the conduct of the peer review evaluation. Observers have access to any meetings that are part of the peer review evaluation session. The independent observers report their findings to the ERCEA. The ERCEA will share the received report with the Scientific Council. The observers are also encouraged to enter into discussions with the ERCEA officials involved in the peer review evaluation sessions and to make observations on any possible improvements that could be put into practice. Any such suggestions will be recorded in the observer's final report. The ERCEA will inform the Programme Committee of the selected observers' identity, their terms of reference and their findings, and may publish a summary of their reports.

The ERC Scientific Council may also delegate its members to be present during the panel meetings as observers. The objective of their presence during the meetings is monitor the methods and procedures for peer review and proposal evaluation.

All eligible proposals are evaluated by the panel, composed of independent external experts where provided for, to assess their merit with respect to the selection and award criteria relevant for the call. The criteria are set out in the ERCEA Work Programme, based on principles set out in the Horizon Europe Regulation.

Upon conclusion of peer review, the panel draws up the final list of proposals for possible funding. In total three lists will be composed:

1. retained list which includes proposals that achieved sufficiently high quality for possible funding.

2. reserve list which includes proposals that are eligible for future funding if other proposals decline the grant or there will be availability of additional budget;
3. not retained list which includes: proposals that are found to be ineligible; proposals considered not to achieve the required threshold of quality after each step of the peer review evaluation; proposals which, cannot be funded because the available budget is insufficient, and proposals remaining from the reserve list, when the budget available for a particular call has been used up.

The assessment of quality, and the recommended rank order for funding of proposals on the retained list, is based on the peer review evaluation of the proposal against all relevant criteria. The ERCEA Scientific Council will confirm the final ranked list of proposals recommended for funding by the peer review evaluation.

Any proposal which does not fulfil the ethical requirements or the conditions set out in the Horizon Europe Regulation, the ERCEA Work Programme or in the call shall be rejected or terminated once the ethical unacceptability has been established.

Proposals may be rejected from the selection procedure at any time, if a PI or applicant legal entity has misrepresented data or information included in the proposal, with due regard being given to the principle of proportionality.

Following the "scientific/technical evaluation" of proposals, the ERCEA provides feedback through an "information letter" to the applicants. The aim is to inform applicants of the result of the evaluation by independent external experts, and for the successful proposals, to initiate the "grant preparation" phase. All communication and feedback from the ERCEA to the applicants is done through the Portal.

1. Following the admissibility and eligibility check: applicants whose proposals are found to be inadmissible or ineligible are informed of the grounds for such a decision and of the means of redress.
2. Following the first-step evaluation in a two-step or three-step peer review evaluation, and following the second step evaluation in a three-step peer review evaluation:
  - a. applicants whose proposals are not retained for the next step for budgetary or quality reasons, as applicable, receive feedback on the peer review evaluation in the form of an Evaluation Report (ER);
  - b. for the proposals rejected after failing a quality threshold, the comments contained in the ER may only be complete for those evaluation elements examined up to the point when the threshold was failed;
  - c. applicants whose proposals are retained for the next step receive a notification, and may be invited to attend an interview.

3. Following the second step evaluation in a two-step peer review evaluation, following the third step evaluation in a three-step peer review evaluation:
  - a. all applicants receive feedback on the peer review evaluation in the form of an ER

The ER provides the outcome of the "scientific/technical evaluation". It may contain, as appropriate, the final panel score and ranking range, the panel comments and the assessment of the evaluation elements by the individual independent external experts. For proposals on the retained list, where appropriate, the ER indicates any recommendation made on the maximum amount of funding to be awarded, and any other appropriate recommendations on the conduct of the project, including possible suggestions for improvements to the methodology and planning of the work.

For proposals raising ethics issues, feedback on the results of the ethics review process is communicated to the applicants in the form of an ethics summary report, which may include ethics requirements that may become contractual obligations.

Applicants whose proposals are rejected because of ethics and research integrity breaches, or due to contacts with independent external experts involved in the evaluation in the attempt to influence its outcome, are informed of the specific reason for rejection and the means of redress, after having been given the opportunity to provide observations.

The ERCEA will not change the content of the ERs that form part of the panel report, except if necessary to improve readability or, exceptionally, to remove any factual errors or inappropriate comments, provided such errors or comments do not affect the evaluation results.

The information letter will contain indications of the means of redress available, including the evaluation review procedure.

After each peer review evaluation, a report is prepared by the ERCEA services and made available to the programme committee. The report gives information on the proposals received (for example, numbers of proposals received, results of each call, ranked lists, evaluation scores of proposals and budget requested), on the evaluation procedure and on the independent external experts. A subset of this information is also made available to the NCPs (including personal data, such as evaluation scores of proposals as well as ranked lists).

For communication purposes, the ERCEA may publish, after the end of the evaluation process and in any appropriate media, general information on the results of the evaluation. Moreover, the ERCEA may publish information on the proposals recommended for funding as a result of the evaluation. Applicants may be contacted for any other communication activities involving their proposed project and/or requiring their participation.

		<p>For purposes related to monitoring, study and evaluating implementation of ERCEA actions, the ERCEA may need that submitted proposals and their respective evaluation data be processed by external parties.</p> <p>The data may also be used for the monitoring and evaluation of the EU funding programme and the design of future programmes. Any processing will be conducted in compliance with the requirements of Regulation (EU) 2018/1725.</p> <p>On the basis of the final ranked list as drawn by the ERCEA, the grants are awarded to the applicant legal entities by the Responsible Authorising Officer, within the available budget, by means of a formal grant agreement. The signature of such agreement is preceded by the adoption of an award decision taken by the Responsible Authorising Officer. The grant agreements are concluded with the applicant legal entities subject to the financial and legal procedures. The PI and the applicant legal entity may receive requests for further administrative, legal, ethics, technical and financial information necessary for the preparation of a grant agreement. The ERCEA services may request minor adaptations, in line with the results of the evaluations, possibly including modifications to the budget. The ERCEA services will justify all requested changes.</p> <p>III. Validation Procedure</p> <p>Before the ERCEA is able to conclude a grant agreement with the awarded applicant, the applicant is required to pass the (re)validation:</p> <ul style="list-style-type: none"> <li>a. procedure of applicant participating in the granted award;</li> <li>b. check of the legal existence of the participant, their legal status and contact data;</li> <li>c. of decision-making and delegation rights of the applicants' legal representatives.</li> </ul> <p>Moreover, the validation services will also prepare the applicants' financial capacity, and ownership and control assessments.</p> <p>Following the above, the validation services will encode the bank account and the legal entity files into the Commission's accounting system, after which the ERCEA is able to conclude a grant agreement with the awarded applicant.</p>
8	Description of the categories of data subjects	<p>Whose personal data are being processed? In case data categories differ between different categories of persons, please explain as well (e.g. suspects vs. witnesses in administrative inquiries)</p> <p><input checked="" type="checkbox"/> EA staff (Contractual and temporary staff in active position)</p> <p><input type="checkbox"/> Visitors to the EA</p> <p><input type="checkbox"/> Contractors providing goods or services</p>



		<input checked="" type="checkbox"/> Applicants <input type="checkbox"/> Relatives of the data subject <input type="checkbox"/> Complainants, correspondents and enquirers <input type="checkbox"/> Witnesses <input checked="" type="checkbox"/> Beneficiaries <input checked="" type="checkbox"/> External experts <input type="checkbox"/> Contractors <input type="checkbox"/> Other, please specify _____
9	<b>Description of personal data categories</b>  Indicate <b>all</b> the categories of personal data processed and specify which personal data are being processed for each category (between brackets under/next to each category):	<i>Categories of personal data:</i>  <b>Error! Bookmark not defined.</b> in the form of personal identification numbers  [For registration on the Portal: participant Identification Code (PIC), other person identifiers linked to other sources (ORCID/Researcher ID)]  [For validation procedure: personal national identification number, identification document number, PIC (when the applicant is a natural person)]  [For administrative form (Part A): ORCID ID, Researcher ID and/or any other ID]  <input checked="" type="checkbox"/> concerning the physical characteristics of persons as well as the image, voice or fingerprints  [For validation procedure: photo/image if available on the identification document]  <input checked="" type="checkbox"/> concerning the data subject's private sphere  [For registration on the Portal: title, gender, nationality]  [For validation procedure: title, gender, date and place of birth, nationality]  [For administrative form (Part A): title, gender, date and place of birth, nationality]  <input checked="" type="checkbox"/> concerning pay, allowances and bank accounts  [For validation procedure: bank account related data (account number, name and address of the holder, name and address of the bank, available funds)]  <input checked="" type="checkbox"/> concerning recruitment and contracts  <input checked="" type="checkbox"/> concerning the data subject's family  [For the purpose of submission of supporting documents for extension requests for 18 months on the basis of maternity leave: birth certificate(s) or passport(s) of the child(ren)]

		<p><input checked="" type="checkbox"/> concerning the data subject's career</p> <p>[For registration on the Portal: educational background: (names of institutions; titles; qualifications; academic/research records; academic qualifications), areas of expertise and technical skills, languages spoken, personal data embedded in/stemming from publications); employment related data: current employment status (employer's name and address; 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 experiences, including on former assistance to the EU entities, including the ERCEA; peer review experience); other employment related data (business registration details; natural person's business website, other contracts of the data subject with third parties, organisational internal documents: timesheets; salaries; reports from business trips; missions/meetings minutes/reports; work assignments/roles given in IT systems and the data subject's role in it]</p> <p>[For the purpose of submission of supporting documents for extension requests in case of clinical trainings: an official document signed by the employer (usually a hospital) certifying start and end date(s) of the individual training period(s)]</p> <p>[For administrative form (Part A): current organisation name, name of the department/faculty/institute/laboratory in the organisation]</p> <p>[For CV to be attached to the administrative form (Part B1):</p> <p>Education: name of faculty, department, university/institution, country where the university/institution is located, date of the issuance of the completion of education where EQF 7 and EQF 8 (or education levels similar to 'Master' and 'PhD) level of education was achieved, in case of EQF 8 (or similar education level) the name of Supervisor</p> <p>Current and previous position(s): the period of employment, position held, name of faculty/department, name of university/institution, country where the university/institution is located</p> <p>Fellowships: the period of the fellowship, the title of the fellowship, name of faculty/department/centre, name of university/institution, where the university/institution is located; in case of award(s): the date of the award, the name of the award and the name of the issuing institution/country</p>
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	<p>Supervision of graduate students and postdoctoral fellow (if applicable): the period of supervision, number of Postdocs/PhD/Master students, name of faculty/department/centre, name of university/institution, country where the university/institution is located</p> <p>Teaching activities (if applicable): the period of teaching activities, the position and the topic being taught, name of the university/institution, country where the university/institution is located</p> <p>Organisation of scientific meetings (if applicable): the date(s) of scientific meetings, the role at the scientific meetings, the name of the event, type of the event, number of participants, country where the event was held</p> <p>Institutional responsibilities (if applicable): the period of the activity, position title, name of university/institution, country where the university/institution is located</p> <p>Reviewing activities (if applicable): the period of the activity, title, name of university/institution, country where the university/institution is located</p> <p>Memberships of scientific societies (if applicable): period of the activity, title, name of faculty/department/centre, name of university/institution, country where the university/institution is located</p> <p>Major collaborations (if applicable): name of collaborators, topic, name of faculty/department/centre, name of university/institution, country where the university/institution is located]</p> <p>[For administrative form (Part B1): information on all ongoing and submitted grants and funding of the PI: project title, role of the PI and funding source]</p> <p>[For 'Early achievements track record' to be attached to the administrative form (Part B1): List of 5 (five) or less most important publications in case of Starting Grant, list of 10 (ten) or less most important publications in case of Consolidator Grant where you are the main author and/or without the co-authorship of your PhD supervisor, if applicable include granted patent(s), invited presentations to internationally established conferences and/or international advanced schools, prizes/awards/academy memberships and etc]</p> <p>[Personal data to be uploaded electronically in PDF format: PhD certificate]</p> <p><input checked="" type="checkbox"/> concerning leave and absences</p>
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		<p>number for business partner); business, ownership and tax related data (such as revenues and patrimony, business/economic activity exercised on self-employed basis, number/value of shares or voting rights held by natural persons or group of natural persons, social security contributions, VAT and other taxes paid VAT number); data necessary for evaluation and assessment of eligibility, selection and award criteria and establishment of role of a person within the applicant organisation (ownership and control related data (data on nationality, citizenship, place of residence, family ties (if relevant), ownership rights of and membership to governance structures of entities), selection criteria related personal data (financial capacity assessment related data), data evidencing employment status (such as for Legal Representative, LEAR, a role in a governance structure of entity)))</p> <p>[data necessary in administrative form (Part A) that is directly linked to personal data:</p> <ol style="list-style-type: none"> <li>1. Host institution data: PIC, legal name, address of the organisation, website, type of the legal status (public body, non-profit, legal person and etc), enterprise data (applicable if SME), first and last name of the contact person in the host institution, email of the contact person in the host institution, position of the contact person in the host institution, name of the department of the host institution where the contact person is, address of the host institution, phone number (business, mobile, landline, voice over IP)</li> <li>2. Department carrying out the proposed work: name of the department, address of the department]</li> </ol> <p>[data necessary in administrative form (Part A) that is directly linked to personal data of the Principal Investigator: title of the proposal, the acronym, abstract]</p> <p>[data necessary in administrative form (Part B1) that is directly linked to personal data of the Principal Investigator: last name of the applicant, proposal full title, acronym, name of the host institution, summary of the proposal]</p> <p>[Personal data to be uploaded electronically in PDF format: evidence proving extension of the eligibility window (if applicable), host institution support letter (which shall include the name of the legal entity that is associated with the proposal (the applicant legal entity), full name of the principal investigator, acronym and title of the proposal, name of the host institution, favourable opinion(s) from ethics committees and/or any regulatory approvals that may contain full names, addresses and other personal data]</p>
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<p>10</p>	<p><b>Retention time (time limit for keeping the personal data)</b></p>	<p><i>Categories of personal data processing likely to present specific risks:</i></p> <p><input type="checkbox"/> data relating to suspected offences, offences, criminal convictions or security measures</p> <p><input type="checkbox"/> data being used to evaluate personal aspects of the data subject (ability, efficiency, conduct)</p> <p><i>Categories of personal data whose processing is prohibited, with exceptions (art. 10 new Regulation):</i></p> <p> <input type="checkbox"/> revealing racial or ethnic origin  <input type="checkbox"/> revealing political opinions  <input type="checkbox"/> revealing religious or philosophical beliefs  <input type="checkbox"/> revealing trade-union membership  <input checked="" type="checkbox"/> concerning health </p> <p>[For the purpose of submission of supporting documents for extension requests on the basis of long-term illness: an official signed document from the employer certifying start and end date(s) of the individual leave(s), an official document explaining the long-term nature of the illness or condition of the applicant or the close family member (e.g. from a hospital, a doctor or an insurance company). The supporting documents should also prove the family relationship in case the extension request relates to caring for a seriously ill close family member</p> <p>genetic data, biometric data for the purpose of uniquely identifying a natural person <input checked="" type="checkbox"/></p> <p>[Signatures]</p> <p>concerning sex life or sexual orientation</p> <p><i>Specify any additional data or explanatory information on the data being processed, if any:</i></p> <p>Further incidental and/or unsolicited personal data may be referenced by the data subjects, such as: third-parties personal data (the supporting documents submitted by the data subjects may contain personal data of third-parties (other researchers mentioned in proposals; board members) not necessary for the present purposes of processing) and/or 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 without the request from the ERCEA; references to personal data freely available on social networks and the Internet; search related data of logged in users: search history and recommendations preferences (on the Portal if clicks on recommended items).</p> <p>All personal data related to validation procedure of an applicant who:</p> <p>(1) was awarded a legal commitment shall be retained for 10 years, starting from the end of the year of the last financial operation or the accounting operation linked to the last legal commitment;</p>
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	<p>(2) was awarded no legal commitment but submitted a proposal shall be retained for 10 years, starting from the last closure of the last call for proposal they participated in; and</p> <p>(3) all applicant profiles (including invalid self-registrants) shall be retained for 10 years, starting from the end of the year when the profile was modified/interacted with.</p> <p>All personal data of applicants registered on the Portal will be deleted at the request of the applicant to have their profile deleted. The deletion will concern only the data under the Portal user profile for applicants, other profiles that the applicant may have will keep the personal data according to their specific retention period. The applicant may withdraw consent to receive personalised recommendations at any time (if applicable). Following this withdrawal of consent, the search related data of logged in users will be deleted within 72 hours.</p> <p>Personal data of unsuccessful applicants (including outdated versions or withdrawn proposals) are retained for a period of 5 (five) years after the end of the year of the call submission deadline.</p> <p>Personal data of beneficiaries who were rewarded with a grant are retained for a period of 10 (ten) 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.</p> <p>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p><input checked="" type="checkbox"/> <b>Error! Bookmark not defined.</b> yes <input type="checkbox"/> no</p> <p>If yes, indicate the further retention time: ...</p> <p>Personal data (title; first and last name; researcher ID; email) of the scientific staff of the applicants and beneficiaries will be retained for a period of 25 (twenty-five) years after:</p> <ol style="list-style-type: none"> <li>1. the end of the year of the call submission deadline (for the scientific staff of applicants)</li> <li>2. 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 beneficiaries)</li> </ol> <p>for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes</p> <p>Explicitly for the purpose of detection of altered personal data in future applications and/or detection of plagiarism in future submitted proposals by same or other principal investigators, personal data will be retained for a period of 15 (fifteen) years after the closure of the call.</p> <p>The type of personal data that will be retained for the purpose above is:</p> <ol style="list-style-type: none"> <li>1. Submission data (text files of application ['Part B' files]; CVs of applicants; structured submission data ['Part A' files]); extension documents [birth certificates, etc]</li> <li>2. Evaluation data (structured evaluation data; evaluation reports and marks of experts and their</li> </ol>
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		<p>identities; ethical evaluation reports and identities; final ranking and funding lists)</p> <p>Explicitly for historical research purposes, personal data of the scientific staff and the beneficiaries will be retained for an indefinite period of time.</p> <p>The type of personal data that will be retained for the purpose above is:</p> <ol style="list-style-type: none"> <li>1. Submission data (text files of application ['Part B' files]; CVs of applicants; structured submission data ['Part A' files])</li> <li>2. Evaluation data (structured evaluation data; evaluation reports and marks of experts and their identities; ethical evaluation reports and identities; final ranking and funding lists)</li> </ol>
11	Recipients of the data	<p>The persons with access to personal data are:</p> <ol style="list-style-type: none"> <li>1. ERCEA staff, on a need-to-know principle;</li> <li>2. Panel members (given access only to the personal data in Part B1 and B2 of the administrative form);</li> <li>3. Remote experts (given access only to the personal data in Part B2 with CVs of the applicants, as submitted in part B1 of the administrative form));</li> <li>4. Any natural or legal person with whom the ERCEA is under regulatory duty or who need personal data in the public interest or for legitimate performance of tasks within their competence (e.g. OLAF, EU Courts, Internal Audit Services of the Commission, Court of Auditors, European Ombudsman, EDPS);</li> <li>5. The Scientific Council of the ERCEA which requires the data in the public interest for legitimate performance of tasks within its competence;</li> <li>6. Any natural or legal person who needs the data in the public interest, if the recipient needs the data for legitimate performance of tasks within its competence in various programming/legislative bodies;</li> <li>7. Any natural or legal person who has a contractual relationship with the ERCEA and who is working on behalf of and under the responsibility of the ERCEA 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)).</li> </ol> <p>The persons with access to personal data made available in the applicants section of the Portal are:</p> <ol style="list-style-type: none"> <li>1. ERCEA employees, on a need-to-know principle;</li> <li>2. The authorised staff of the Commission on the need-to-know principle;</li> <li>3. Any legal person that is an EU entity processing personal data as described in the corporate privacy statement or is entitled by law (joint controllers);</li> <li>4. Any natural/legal person with whom the Commission is under regulatory duty; or who needs the data in the public interest, if the</li> </ol>



		<p>recipient needs the data for legitimate performance of tasks within its competence (authorised persons representing the Member States; EEA countries; associated countries (if relevant for the programme) in various bodies):</p> <ol style="list-style-type: none"> <li>a. national authorities/agencies,</li> <li>b. national contact points,</li> <li>c. any natural/legal person who has a contractual relationship with a joint-controller and who is working on behalf 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: <ol style="list-style-type: none"> <li>i. independent experts;</li> <li>ii. authorised staff of contractors acting as processors for a specific processing operation;</li> </ol> </li> </ol> <p>5. When data subjects choose to publish (parts of) their Portal user profile, the recipient is the general public.</p>
12	<p><b>Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?</b></p>	<p>Personal data may be transferred outside of the EU/EEA for the purpose of evaluation of the proposal by experts from non-EU/EEA countries</p> <p>The transfer of personal data to countries outside the EU/EEA is justified on the basis of:</p> <ol style="list-style-type: none"> <li>1. Art. 47 of the Regulation - the European Commission's adequacy decision;</li> <li>2. Art. 48(2) of the Regulation – implementation of appropriate safeguards, such as standard data protection clauses.</li> </ol> <p>In case of the absence of an adequacy decision, or of appropriate safeguard, transfer of personal data to a third country or an international organisation is based on Art. 50(1), in particular clauses a, b, c and d:</p> <ol style="list-style-type: none"> <li>a: 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;</li> <li>b: the transfer is necessary for the performance of a contract between the data subject and the controller or the implementation of pre-contractual measures taken at the data subject's request;</li> <li>c: the transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the controller and another natural or legal person;</li> <li>d: the transfer is necessary for important reasons of public interest;</li> </ol>
13	<p><b><u>General</u> description of the technical and organisational security measures</b></p>	<p>All personal data on paper, if relevant, is stored in the premises of the Commission, access to which is controlled by access policies based on the Commission Decision (EU, Euratom) 2015/443 on security in the Commission. The paper files are stored in locked/secure cupboards and/or storage offices. Access is limited and is on a need-to-know basis.</p>

		<p>All personal data in electronic format (emails, documents, databases, 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). All Commission IT systems (i.e. all Communication and Information Systems owned, procured, managed or used/operated by or on behalf of the Commission) 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 Commission 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.</p> <p>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.):</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> </ul> <p>Access to data is only available to registered users as approved by their hierarchy through a separate access control module managed by the Commission as Joint-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.</p>
14	<b>Information to data subjects/Specific Privacy Statement (SPS)</b>	<p>The data protection notice for the use of the Portal is available <a href="#">here</a> .</p> <p>The data protection notice for participant registration, assessment and validation can be found <a href="#">here</a></p> <p>The data protection notice regarding the joint controllers is available <a href="#">here</a></p>