



## 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°

62

---

*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 the following processes:*

- 1) Mandatory records under Art 31 of the data protection regulation*
- 2) Compliance check and risk screening*

*The ground for the record is:*

- Regularization of a data processing activity already carried out
  - Record of a new data processing activity prior to its implementation
  - Change of a data processing activity
  - Update of previous record
-

<b>PART 1</b> <b>(This part is public on Europa)</b> <b>Participant registration, assessment and validation management</b>		
<b>1</b>	<b>Creation and last update of this record (if applicable)</b>	DPR-EC-01024 Last update 29/5/2025
<b>2</b>	<b>Title and one-sentence description of the processing</b>	Participant registration, assessment and validation management for the purpose of participation to EU grants, prizes, procurement and activities via the EU Funding & Tenders Portal (hereinafter ‘Portal’)
<b>Part 1 - Article 31 Record</b>		
<b>2a</b>	<b>Legal basis</b>	The 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 (Article 5(1)(a) of Regulation)  for the management and functioning of the Union Institutions or bodies (Recital (22) of the Regulation)  for compliance with a legal obligation to which the controller is subject (Article 5(1)(b) of Regulation)  for the performance of a contract to which the data subject is party (Article 5(1)(c) of Regulation) <sup>1</sup>
<b>3</b>	<b>Function and contact details of the controller</b>	The controller is the European Research Executive Agency (REA), represented by its Director. For organisational reasons, the role of the data controller has been entrusted by the Director to the delegated controller and is exercised by REA Head of Department D ‘Coordination and Support Services’.  The data controller may be contacted via functional mailbox: <a href="mailto:EU-CENTRAL-VALIDATION-SERVICES-DATA-PROTECTION@ec.europa.eu">EU-CENTRAL-VALIDATION-SERVICES-DATA-PROTECTION@ec.europa.eu</a>
<b>4</b>	<b>Contact details of the Data Protection Officer (DPO)</b>	<a href="mailto:REA-DATA-PROTECTION-OFFICER@ec.europa.eu">REA-DATA-PROTECTION-OFFICER@ec.europa.eu</a>

<sup>1</sup> The legal basis under Article 5(1):

- (i) Regulation (EU, Euratom) 2024/2509 of the European Parliament and of the Council of 23 September 2024 on the financial rules applicable to the general budget of the Union (hereinafter “the Financial Regulation”) (OJ L , 2024/2509, 26.09.2024, ELI: <http://data.europa.eu/eli/reg/2024/2509/oj>.) and in particular: Title V (Common Rules), Title VII (Procurement and Concessions), Title VIII (Grants), Title IX (Prizes), Title XII (Other Budget Implementation Instruments, including management of experts and participant registration and validation) and Annex I (Procurement)
- (ii) The financing decisions form part of the legal basis for a processing operation, where applicable, in line with Article 110 of the Financial Regulation
- (iii) European Union law setting up specific funding programmes and initiatives is providing further legal basis for personal data processing but making reference to the Financial Regulation for actual implementation mechanisms
- (iv) European Union law establishing the EUIBAs as Joint Controllers

Additional legal basis:

- (v) The Terms & Conditions of the Funding & Tenders Portal (available at <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/legalnotice>)
- (vi) The Validation Rules applies by the Central Validation Service (available: [rules-lev-lear-fca\\_en.pdf](https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/legalnotice))
- (vii) Regulation (EU, Euratom) No 883/2013 of the European Parliament and of the Council of 11 September 2013 concerning investigations conducted by the European Anti-Fraud Office (OLAF)
- (viii) Council Regulation (Euratom, EC) No 2185/96 of 11 November 1996 concerning on-the-spot checks and inspections carried out by the Commission in order to protect the European Communities’ financial interests against fraud and other irregularities
- (ix) Council Regulation (EU) 2017/1939 of 12 October 2017 implementing enhanced cooperation on the establishment of the European Public Prosecutor’s Office

5	<b>Name and contact details of joint controller (where applicable)</b>	<p>Joint controllership is involved  <input checked="" type="checkbox"/>yes <input type="checkbox"/>no</p> <p>The joint processing operations consist of the following processing activities:</p> <ul style="list-style-type: none"> <li>- Definition of purposes and design of the related means (business processes and IT systems) for processing operations related to the management of contracts via the SEDIA corporate initiative</li> <li>- Registration, (re)assessment and (re)validation of participants in grants, prizes, and public procurement procedures: <ul style="list-style-type: none"> <li>▪ validation of legal existence of participants, their legal status and contact data;</li> <li>▪ validation of decision-making and delegation rights of participants' legal representatives;</li> <li>▪ preparation of participants' financial capacity;</li> <li>▪ preparation of participants' ownership and control assessments;</li> <li>▪ encoding of bank account and legal entity files into the Commission's accounting system.</li> </ul> </li> </ul> <p><a href="#">List of Joint controllers</a></p>
6	<b>Name and contact details of processor (where applicable)</b>	<p>Processors are involved in the processing  <input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p>
7	<b>Purpose of the processing</b>	<p>The purpose of the processing is the participant registration, assessment and validation of legal entities for the purpose of managing EU programmes, grants, prizes, procurement and activities via the EU Funding &amp; Tenders Portal and the related processing operations undertaken by the Joint Controllers.</p> <p>This covers the following types of processes: (i) validation of legal entity existence and status (e.g. public / private, profit / not for profit, SME/MIDCAP, etc) and any change to this status throughout the life cycle (e.g. universal takeovers, change of status); (ii) validation of Legal Entity Appointed Representative, (iii) preparation of financial capacity assessment, (iv) preparation of ownership and control assessment and (v) bank account related data management.</p> <p>This record covers also all internal and external checks, audits, investigations and other proceedings, that users of public funds of European Union are subject to, to assess the legality and regularity of the transactions underlying the implementation of the European Union budget. The audit and control activities can be conducted at any time during the performance of the programme / contract / project, as well as thereafter, and can concern any aspect, depending on the needs of the Joint Controller.</p> <p>The Joint Controllers may use limited personal data obtained through the Portal for the purposes of monitoring, evaluating, and improving their programmes and initiatives; to account for these in front of the legislative authorities (the European Parliament and the European Council); to comply with their public reporting obligations; and as a source of information for policymaking.</p>

8	<p><b>Description of the categories of data subjects</b></p>	<ul style="list-style-type: none"> <li>• Staff of European Union Institutions Bodies and Agencies (including officials, officials on probation, temporary agents, contractual agents, trainees) having a need to know and working with the participant related data either for validation or assessment or staff working with IT-developments or staff needing to consult the Participant Register data for their tasks.</li> <li>• Natural persons representing the Participants/Beneficiaries/Contractors vis-à-vis the EU Funding and Tenders Portal activities (essentially in grant and procurement procedures and the ensuing legal commitments management), notably as self-registrants, account administrators, Legal Entity Appointed Representatives, legal representatives, but also as third parties whose personal data is needed or embedded in the documents on the basis of which the validation / assessment takes place</li> </ul> <p><b>This list is not exhaustive</b></p>
9	<p><b>Description of personal data categories</b></p> <p>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):</p>	<p><input checked="" type="checkbox"/> Identification data</p> <p>(1) first name, middle name, last name (including maiden name) and business name (in case it is enabling identification) (2) gender (3) title (4) all personal data contained in different types of identification documents (such as date of birth, place of birth, nationality, personal national identification number, identification document number, photo/image, signature) (5) Participant Identification Code (PIC) (when the Participant is a natural person)</p> <p><input checked="" type="checkbox"/> Contact data</p> <p>(1) e-mail (2) contact (phone) numbers – including all types, such as: personal, business, GSM, landline, fax, voice over IP) (3) personal address(es) submitted (such as origin, permanent, current, previous residences)</p> <p><input type="checkbox"/> Education related data</p> <p><input checked="" type="checkbox"/> Employment related data</p> <p>Function/position/employment status (such as for Legal Representative, Legal Entity Appointed Representative, a role in a governance structure of entity)</p> <p><input checked="" type="checkbox"/> Financial data of natural persons</p> <p>(1) bank account related data (such as account number, name and address of the holder, name and address of the bank, available funds) (2) 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 right held by natural persons or group of natural persons, social security contributions, VAT and other taxes paid, VAT number)</p>

		<p><input checked="" type="checkbox"/> Data necessary for evaluation and assessment of eligibility, selection and award criteria and establishment of role of a person within the Participant organisation</p> <p>(1) eligibility criteria related personal data, inter alia ownership and control related data (such as data on nationality, citizenship, place of residence, family ties (if relevant), ownership rights of and membership to governance structures of entities) (2) selection criteria related personal data (such as financial capacity assessment related data) (3) data evidencing employment status (such as for Legal Representative, Legal Entity Appointed Representative, a role in a governance structure of entity)</p> <p><input checked="" type="checkbox"/> Authentication and access data</p> <p>(1) EU Login credentials (2) IP address (3) security data/log in files (4) internal reference numbers attributed to supporting documents (if leading to identifiability of a natural person) (5) internal identification / reference data vis-a-vis the accounting system(s) of the European Commission</p> <p><input checked="" type="checkbox"/> Special category of data</p> <p>Data revealing racial or ethnic origin</p> <p>The participant registration, assessment and validation management processing collects identification documents for validation of identities of Legal Representatives, Legal Entity Appointed Representatives and natural persons relevant for Ownership and Control Assessments. These identification documents contain photos that may reveal racial or ethnic origin. However, these data are not relevant for the processing, the IDs or passports are only collected for identification purposes</p> <p><input checked="" type="checkbox"/> Other incidental and unsolicited data</p> <p>(1) Third party personal data: the supporting documents submitted by the Participant may contain personal data of third persons (such as other (governing) board members, owners, etc.) not necessary for purposes of processing in business areas of the Portal (2) data revealing racial or ethnic origin - if these data appear in the documents (ID documents, other documents) provided by the data subjects.</p>
<b>10</b>	<b>Retention time (time limit for keeping the personal data)</b>	The Joint Controllers only keep personal data for the time necessary to fulfil the purpose of collection or processing, namely for the following periods:

		<table border="1" data-bbox="810 129 1528 488"> <thead> <tr> <th data-bbox="810 129 1086 159">Retention period</th> <th data-bbox="1086 129 1362 159">Start date/moment</th> <th data-bbox="1362 129 1528 159">End date/moment</th> </tr> </thead> <tbody> <tr> <td data-bbox="810 159 1086 277">For Participant who has been awarded a Legal Commitment</td> <td data-bbox="1086 159 1362 277">the end of the year (31/12/YYYY) of the last financial / accounting operation linked to the last legal commitment of the Participant (N)</td> <td data-bbox="1362 159 1528 277">N+10 years</td> </tr> <tr> <td data-bbox="810 277 1086 360">For Participant who has been awarded no Legal Commitment, but has submitted a proposal / tender</td> <td data-bbox="1086 277 1362 360">end of the year (31/12/YYYY) of the last closure of the last call for proposal / tender they participated to (N)</td> <td data-bbox="1362 277 1528 360">N+10 years</td> </tr> <tr> <td data-bbox="810 360 1086 488">In any case – for all Participant profiles (including invalid self-registrants)</td> <td data-bbox="1086 360 1362 488">end of the year (31/12/YYYY) when the Participant last modified / interacted with / via the Participant Register Profile (i.e. changed any data, sent a message or uploaded a document) (N)</td> <td data-bbox="1362 360 1528 488">N+10 years</td> </tr> </tbody> </table> <p data-bbox="810 517 1528 584">The Retention Period is based on the Common Commission-level retention list for European Commission files.</p> <p data-bbox="810 636 1528 734">Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p data-bbox="810 763 965 801"><input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p>	Retention period	Start date/moment	End date/moment	For Participant who has been awarded a Legal Commitment	the end of the year (31/12/YYYY) of the last financial / accounting operation linked to the last legal commitment of the Participant (N)	N+10 years	For Participant who has been awarded no Legal Commitment, but has submitted a proposal / tender	end of the year (31/12/YYYY) of the last closure of the last call for proposal / tender they participated to (N)	N+10 years	In any case – for all Participant profiles (including invalid self-registrants)	end of the year (31/12/YYYY) when the Participant last modified / interacted with / via the Participant Register Profile (i.e. changed any data, sent a message or uploaded a document) (N)	N+10 years
Retention period	Start date/moment	End date/moment												
For Participant who has been awarded a Legal Commitment	the end of the year (31/12/YYYY) of the last financial / accounting operation linked to the last legal commitment of the Participant (N)	N+10 years												
For Participant who has been awarded no Legal Commitment, but has submitted a proposal / tender	end of the year (31/12/YYYY) of the last closure of the last call for proposal / tender they participated to (N)	N+10 years												
In any case – for all Participant profiles (including invalid self-registrants)	end of the year (31/12/YYYY) when the Participant last modified / interacted with / via the Participant Register Profile (i.e. changed any data, sent a message or uploaded a document) (N)	N+10 years												
11	<p data-bbox="220 837 496 869"><b>Recipients of the data</b></p>	<p data-bbox="810 837 1528 904">Within the European Union organisation (the Joint Controllers / the EUIBA), a recipient may be:</p> <p data-bbox="810 920 1528 1019">(i) any legal person that is an EUIBA who works with the Portal processing operations covered by this privacy statement or is entitled by law and</p> <p data-bbox="810 1034 1528 1205">(ii) any legal or natural person who is in a contractual relationship with an EUIBA who works with the Portal processing operations covered by this privacy statement. Such as: staff of European Union institutions and bodies, external experts and staff of contractors</p> <p data-bbox="810 1272 1528 1339">Outside the European Union organisation, a recipient may be:</p> <p data-bbox="810 1355 1528 1691">(i) any legal or natural person to whom EUIBA is under regulatory duty or who needs it in the public interest and the recipient needs it for legitimate performance of tasks within its competence. Such as: authorised persons representing EU Member States / EEA countries (and for associated countries if relevant for the programme) in various programming / legislative bodies (like programme committees, advisory groups, national authorities / agencies / contact points, etc.) and authorised persons representing industry in case of EU joint undertakings' operations, etc.</p> <p data-bbox="810 1706 1528 2011">(ii) any legal or natural person who has a contractual relationship with an EUIBA and who is working on behalf of and under the responsibility of the Joint-Controllers for the purposes of performing the tasks of the relevant contract or has a need-to-know stemming from the contract. Such as: staff of contractors acting as processors for a specific processing operation (auditor, event organiser) external auditors / contractors carrying out financial verifications, etc.</p>												

		<p>Further specific disclosure:</p> <p>(iii) Specifically in the frame of procurement and grant management using Participant Register data: partner organisations chosen by participant and included in participant's grant or tender proposal</p> <p>(iv) In accordance with the Financial Regulation (particularly Article 38 et al), certain information on recipients of EU funds are published annually on the Europa webpage (Financial Transparency System: <a href="#">European Commission - Financial Transparency System</a>; the Official Journal of the European Union and/or on the applicable website of the EUIBA)</p> <p>(v) pursuant to Article 3(13) of Regulation (EU) 2018/1725, public authorities which may receive personal data in the framework of a particular inquiry in accordance with European Union or Member State law shall not be regarded as recipients.</p> <p>The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing. Disclosure to recipients is exercised in compliance with the principles of "necessity" and "data minimisation". The natural persons further abide by the statutory obligations, and when required, additional confidentiality agreements.</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>Data is transferred to countries outside the EU or EEA  <input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p> <p>Data is transferred to international organisation(s)  <input type="checkbox"/>yes <input checked="" type="checkbox"/>no</p>
	<p><b><u>General</u> description of the technical and organisational security measures</b></p>	<p>(i) LEGISLATION  Regarding main legislation applicable to the information security, the following are applicable to the processing covered by this record:  - European Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 addresses the security of communication and information systems in the European Commission (available at: <a href="#">Decision - 2017/46 - EN - EUR-Lex</a>);  - Commission Decision (EU, Euratom) 2015/443 of 13 March 2015 addresses security in the European Commission (available at: <a href="https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015D0443">https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32015D0443</a>).</p> <p>(ii) TECHNICAL MEASURES  The Commission has adopted, and maintains, a comprehensive IT Security Strategy (available at: <a href="https://myintracomm.ec.europa.eu/corp/digit/itsecurity/Documents/IT-Security-Strategy-2019.pdf">https://myintracomm.ec.europa.eu/corp/digit/itsecurity/Documents/IT-Security-Strategy-2019.pdf</a>), the aim of which is to protect its information assets effectively.  This includes all personal data collected, processed and stored by the Joint Controllers.  In matters of cyber-security, the Commission is a founding member of CERT-EU (more information is available at: <a href="https://cert.europa.eu/cert/plainedition/en/cert_about.html">https://cert.europa.eu/cert/plainedition/en/cert_about.html</a>), a team of IT security specialists from all of the European</p>

Union institutions and bodies, and with similar CERT organisations in European Union member states.

The CERT-EU principles and rules are applied to the processing of personal data covered by this processing.

The Joint-Controllers operate an elaborate and risk-based system of ‘Security Monitoring’, ‘Information Security Incident Management’, and ‘Security Operations Engineering’.

There is a continuous program of cyber-security awareness raising amongst Joint-Controllers’ staff in general, and specifically of those responsible for the business aspects of IT development and operations: the ‘System Owners’ and / or ‘Business Process Owners’.

Improved authentication and access management, including digital certificate usage, broader deployment of communication encryption and simplified password management are key components to the developing IT infrastructure security posture.

The size and complexity of the modern IT landscape are constantly growing.

The European Commission is building the ability to deliver robust cybersecurity in an environment of such dynamic and scale, by leveraging accurate data and increased automation, both in terms of scope and quality.

The technical aspects of IT development and operations are subject to an internal set of IT Security Policies, Standards and

Guidelines

(<https://myintracomm.ec.europa.eu/corp/digit/itsecurity/Pages/IT-security-standards-and-guidelines.aspx>).

### (iii) ORGANISATIONAL MEASURES

Access to (personal) data is granted solely to authorised persons with a need to know for the purposes of this processing operation.

At governance level, IT security is a key responsibility of the Information Technology and Cybersecurity Board of European Commission (ITCB), which reports directly to the European Commission’s top-level Corporate Management Board (CMB).

Security responsibility for sub-systems of the Portal rests with ‘System Owners’ or ‘Business Process Owners’, who cooperate closely in the frame of the ‘Grant and Procurement Steering Board (GPSB).

The corporate decisions of these management entities ensure technical and organisational security measures to protect the (personal) data processing for the Portal.

### (iv) OTHER

Given that the operations are in the electronic data in a web environment, the attention is also drawn to the management of website cookies.

The management of cookies is explained at <https://wikis.ec.europa.eu/display/WEBGUIDE/04.+Cookies>

14	<b><u>Data subject rights/restrictions</u></b>	<p>A data subject can exercise his/her rights (Art 17-24 of the Regulation) by submitting a request concerning access, rectification, erasure, restriction or objection to processing of their personal data to the Controller (Article 14(3) of Regulation (EU) 2018/1725) to the <a href="mailto:EU-CENTRAL-VALIDATION-SERVICES-DATA-PROTECTION@ec.europa.eu">EU-CENTRAL-VALIDATION-SERVICES-DATA-PROTECTION@ec.europa.eu</a></p> <p>In line with Article 25 of the Regulation, the controller may restrict the rights of the data subjects based on <a href="#">REA restrictions decision</a> published in the Official Journal of the EU in case where such restriction constitutes a measure necessary to safeguard the protection of the data subjects or the rights and freedoms of other data subjects.</p> <p>Further to the above, data subjects may contact the REA Data Protection Officer (DPO): <a href="mailto:REA-DATA-PROTECTION-OFFICER@ec.europa.eu">REA-DATA-PROTECTION-OFFICER@ec.europa.eu</a> or the data protection officer of the joint-controller specified in the <a href="#">List of Joint controllers</a>.</p> <p>In case of conflict, complaints can be addressed to the European Data Protection Supervisor: <a href="mailto:EDPS@edps.europa.eu">EDPS@edps.europa.eu</a></p>
15	<b>Information to data subjects/Data protection notice (DPN)</b>	<p>A Data Protection Notice (DPN) relevant to this data processing is available at <a href="https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/legalnotice">https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/legalnotice</a> and in <a href="#">Public Central Register for Data Protection Records in REA</a></p> <p>All new users (the data subjects or their representatives) of the Portal are asked to accept when they log in for the first time to the Portal Terms and Conditions and the linked data protection notice (the privacy statement) (available at <a href="#">Legal Provisions for the use of the Horizon Results Platform.pdf</a>).</p>