



EUROPEAN RESEARCH EXECUTIVE AGENCY (REA)

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 Regulation")*

*Record n°: 65
Process: Grants and Prizes award
management*

In accordance with Article 31 of the 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 Regulation*
- 2) Compliance check and risk screening*

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

- 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*



PART 1 (This part is made public) Name of the processing operation		
1	Creation and last update of this record (if applicable)	DPR-EC-01024; last update 29/5/2025.
2	Title and one-sentence description of the processing	Grants and prizes award and management. It covers processing operations relating to the award, management and follow-up of grants, prizes and financial instruments by REA in the context of implementing the EU funding programmes and initiatives assigned to REA.
Part 1 - Article 31 Records of processing activities		
2a	Legal basis	<p>Lawfulness of processing in accordance with Article 5 (1) (a), (b), (c), (d) of the Regulation.</p> <p>Personal data for grants and prizes award and management are processed on the following legal grounds:</p> <ul style="list-style-type: none"> a. 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 European Union institution or body (Article 5(1)(a) of the Regulation; processing of personal data is necessary for the management and functioning of the Union Institutions or bodies (Recital (22) of the Regulation) and/or b. processing is necessary for compliance with a legal obligation to which the Joint Controller is subject (Article 5(1)(b) of the Regulation) and/or c. processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 5(1)(c) of the Regulation). <p>The specific legal bases applying to the processing referred above under (a) and (b) are:</p>



		<ul style="list-style-type: none"> - Regulation (EU, Euratom) 2024/2509 (hereinafter “the Financial Regulation”) 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); - The financing decisions form part of the legal basis for a processing operation, where applicable, in line with Article 110 of the Financial Regulation; - 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; - Union law establishing the European Union institutions, bodies, offices and agencies (hereinafter commonly referred to as “the EUIBAs”) as Joint Controllers.
3	Function and contact details of the controller	<p>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 B, Green Europe.</p> <p>The delegated data controller may be contacted via functional mailbox: REA-LEGAL@ec.europa.eu</p>
4	Contact details of the Data Protection Officer (DPO)	<p>REA-DATA-PROTECTION-OFFICER@ec.europa.eu</p>
5	Name and contact details of joint controller (where applicable)	<p>Joint controllership is involved <input checked="" type="checkbox"/>yes <input type="checkbox"/>no</p> <p>The Joint Personal Data Controllers (hereinafter “the Joint Controllers”) are all the EUIBAs who are parties to the Joint Controllership Arrangement of the Portal (hereinafter “the JCA”) and who process the personal data collected by the Portal business processes.</p> <p>The full list of Joint Controllers is available here.</p> <p>The essence of the Joint Controllership Arrangement covers notably the following processing activities:</p>



		<p>- Entire life cycle of linked personal data processing operations, including (but not limited to) accreditation, application, selection, evaluation, entry into relevant type of legal commitment and all linked financial transactions:</p> <p>a) Registration, (re)assessment and (re)validation of participants in grants, prizes, and public procurement procedures: ▪ validation of legal existence of participants, their legal status and contact data; ▪ validation of decision-making and delegation rights of participants' legal representatives; ▪ preparation of participants' financial capacity; ▪ preparation of participants' ownership and control assessments; ▪ encoding of bank account and legal entity files into the Commission's accounting system; b) User Helpdesk; c) Partner(s) search based on a person's profile; d) Proposal submission; e) Proposal evaluation and management of external experts (including the briefing of experts); f) Approval of selected proposals' lists; g) Evaluation support; h) Grant Agreement (GA) management, including GA, preparation, signature and amendments; i) Project management, including meetings with applicants and beneficiaries, advanced/intermediate/final payments, deliverables, reporting and project monitoring; j) Reporting on socio-economic data or any other aspects; k) Publication and dissemination of project information and deliverables; l) Exploitation of results; m) Follow-up of publications/patents generated by the projects/prizes; n) Communication activities; o) Evaluation of the impact of the EU funding programmes (such as on individual researchers); p) Research networking; q) Networking activities in relation to the programme (among beneficiaries or fellows/researchers/staff, e.g., through the implementation of alumni services); r) Publication of personal data of any staff of any applicant/beneficiary on the Internet or dissemination by any other means for communication, dissemination, exploitation, and networking activities relating to EU projects and funding programmes; s) Design, monitoring and evaluation of the EU funding programmes; t) Policy development;</p> <p>- Publication of a limited set of personal data of beneficiaries on CORDIS/Europa/other dedicated webpages or dissemination by any other means;</p> <p>- All internal and external checks, audits, investigations, and other proceedings that the users of EU public funds</p>
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		<p>are subject to and that assess the legality and regularity of the transactions underlying the implementation of the EU budget: a) Exchange of lists of projects of an auditee between contracting authorities in support of the life-cycle management of an individual audit and extension of audit findings to non-audited periods and projects cases and containing a summary of the audit conclusions; b) Searching and visualisation of information about participants in grants and contracts; c) Checks using tools designed to identify text similarities to detect possible plagiarised texts.</p>
<p>6</p>	<p>Name and contact details of processor (where applicable)</p>	<p>Processors are involved in the processing <input checked="" type="checkbox"/>yes <input type="checkbox"/>no</p> <p>The processors are the independent expert evaluators, monitors and other contractors who are working on behalf of and under the responsibility of REA for the purposes of proposal evaluation; grant management (including checks and reviews); external audits; action reporting; and Research networking.</p>
<p>7</p>	<p>Purpose of the processing</p>	<p>The purpose of the processing operations relating to the award, management and follow-up of grants and prizes is to ensure that:</p> <ol style="list-style-type: none"> 1. proposals are evaluated against the announced criteria in a transparent and effective manner; 2. the best proposals are selected for funding; 3. the ensuing grant agreements are concluded and implemented according to the contractual provisions and in conformity with the sound financial management of the EU budget; 4. the follow-up of projects aims at maximising the dissemination and exploitation of the research results; 5. the processing of information (meta-data; personal data; public/confidential information contained in proposals/results/reports/publications/deliverables of projects; and any further information) collected within the course of operations for the



evaluation of the EU funding programmes and initiatives managed by the Commission is adequate and serves to the improvement of the future EU funding programmes and Initiatives; and that

6. the actions and the provisions of the grant agreements and of the Rules of Contests for prizes are being properly implemented.

This record covers the entire life cycle of linked personal data processing operations including (but not limited to) application, selection, evaluation, validation, entry into and monitoring of relevant type of legal commitment and all linked financial transactions.

The record also covers all internal and external checks, audits, investigations and other proceedings that users of EU public funds are subject to, to assess the legality and regularity of the transactions underlying the implementation of the EU budget. The audit and control activities can be conducted at any time during the performance of the programme/project, as well as thereafter, and can concern any aspect (including beneficiaries; projects; systems; transactions etc.), depending on the needs of the granting authority. The audit and control activities may be carried out on documents; and/or on the spot in any place where the funds in question are managed or used; the geographical scope is therefore worldwide.

REA 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 European Commission and the legislative authorities (the European Parliament and the Council of the European Union); to comply with their public reporting obligations; and as a source of information for policy-making.

A limited subset of the personal data may be processed for communication purposes, as per the rules of each call for proposals / contest for prizes.



8	<p>Description of the categories of data subjects</p>	<ul style="list-style-type: none"> • Within REA: Members of the REA staff. • Outside REA: Other EU staff members of the Commission and of other EU institutions, agencies and bodies. <p>Staff of the legal entities which request (applicants) or receive (beneficiaries) funding through programmes and initiatives managed by the REA within the scope of the concerned actions.</p> <p>Any other person whose data are submitted to the REA in the context of grant management preparation, implementation and follow-up.</p>
9	<p>Description of personal data categories</p> <p>Indicate all 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>The personal data that is processed for grants (and prizes award and management by the Portal) is the following: Categories of personal data:</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Identification data: first name, middle name and last name (including maiden name); gender; title; nationality; Participant Identification Code (PIC) (when the participant is a natural person); other person identifiers linked to other sources (e.g. ORCID ID or Researcher ID); ID document number (passport/other). • <input checked="" type="checkbox"/> Contact data: email; contact (phone) numbers – including all types, such as personal, business, GSM, landline, fax, voice over IP etc.; personal address(es) submitted (such as origin, permanent, current, previous residences). • <input checked="" type="checkbox"/> Employment and career related data: current employment status (such as employer’s name & address, department, function/position, staff category); employment contracts, salaries, timesheets, missions/meetings minutes/reports, supporting documents related to travel costs; career stage. • <input checked="" type="checkbox"/> Financial data of natural persons (for entry into and monitoring of relevant type of legal



		<p>commitment and all linked financial transactions): bank account related data (such as account number, name and address of the holder, name and address of the bank, available funds).</p> <ul style="list-style-type: none">• <input checked="" type="checkbox"/> Data necessary for management of procedural/evaluation/performance related aspects: eligibility criteria related personal data and programme related accreditation data; exclusion criteria related personal data (including declaration on honour and extracts from judicial records for natural persons); selection criteria related personal data; award criteria related personal data; performance related personal data linked to legal commitment with REA (such as quality of performance of participant (if a natural person) or participant's staff during the execution of relevant legal commitment with REA, information linked to participation to meetings); any other procedural (application, evaluation process related, project reporting and monitoring etc.) data that is of personal nature and linked to points listed above (including role in the project); data related to disadvantaged status or vulnerable status (e.g. social and economic situation (poor family and background; from disadvantaged area; status of refugee or displaced person).• <input checked="" type="checkbox"/> Authentication and access data: EU Login credentials; IP address; security data/log in files.• <input checked="" type="checkbox"/> Sensitive personal data<ol style="list-style-type: none">(1) Health related data: information related to health conditions in relation to claims e.g. for special costs or triggering a change for a contractual condition (suspension, amendment, parental leave, etc.).(2) information related to fewer opportunities (e.g. discrimination or social obstacles), triggering a change for a contractual condition (suspension, amendment, termination etc.).• <input checked="" type="checkbox"/> Other incidental and unsolicited data<ol style="list-style-type: none">(1) third party personal data: the supporting documents submitted by the Participant may contain personal data of
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		<p>third persons (such as other experts mentioned in proposals, board members, etc.) not necessary for purposes of processing in business areas of the Portal;</p> <p>(2) data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, and sexual orientation - if these data appear in the documents (CVs, ID documents, other documents) provided by the data subjects without the request of the REA;</p> <p>(3) (references to) personal data freely available on social networks and the Internet.</p> <ul style="list-style-type: none"> • <input checked="" type="checkbox"/> Search related data of logged in users: search history and recommendations preferences. <p>The data categories listed above are exhaustive, but the listed data fields are non-exhaustive.</p>
<p>10</p>	<p>Retention time (time limit for keeping the personal data)</p>	<p>REA applies the principles and retention periods indicated in the Common Retention List of the Commission by analogy:</p> <ul style="list-style-type: none"> - Personal data of staff of applicants - proposals not leading to the award of a grant (including outdated versions or withdrawn proposals): 5 years after the end of the year of the call submission deadline. - Personal data of staff of beneficiaries - granted proposals, grant agreements, deliverable reports, and their related transactions: 10 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>Is any further processing for archiving purposes in the public interest, historical, statistical or scientific purposes envisaged?</p> <p><input checked="" type="checkbox"/> Yes</p> <p>Limited personal data of the scientific staff of the applicants and beneficiaries (title; first and last name; researcher ID; email) - for scientific/historical research and statistical purposes: 25 years after:</p>



	<ul style="list-style-type: none">- the end of the year of the call submission deadline (for the scientific staff of the applicants),- 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 scientific staff of the beneficiaries). <p>Exception for Marie Skłodowska-Curie Actions (MSCA):</p> <p>For scientific/historical research and statistical purposes, the following personal data of researcher candidates/funded researchers and their scientific supervisors involved in the MSCA project/action is retained:</p> <ul style="list-style-type: none">- Identification data: Includes family name, birth family name, first name, title, gender, location of origin, date of birth, nationality.- Data relating to education: Includes university degree and date of award, doctorate expected before the deadline and expected date of award, doctorate and date of award, full-time postgraduate research experience and number of months, other academic qualifications and date of award, and data concerning employment period within the funded project (e.g., start and end dates). <p>This data is kept for 25 years after:</p> <ul style="list-style-type: none">- the end of the year following the closure of the action, for funded researchers and their scientific supervisors involved in the action- the closure of the call, for unsuccessful applications. <p>For the detection of plagiarism and other scientific misconduct, the following personal data of researcher candidates/funded researchers and their scientific supervisors involved in the project/action is retained:</p> <ul style="list-style-type: none">- Identity: Includes the identity of the researcher allegedly involved in possible scientific misconduct, and the allegations.- Additional data: professional path, publications, the entire proposal, or other data related to the allegations.
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		<p>This data is kept for 15 years after the end of the year following the closure of the action for successful proposals, and the date of closure of the call for unsuccessful proposals.</p>
<p>11</p>	<p>Recipients of the data</p>	<ul style="list-style-type: none"> • Within REA: <p>Based on the need-to-know principle: Authorised staff of REA, based on the need-to-know principle.</p> <ul style="list-style-type: none"> • Outside REA: <p>Based on the need-to-know principle:</p> <ol style="list-style-type: none"> 1. any legal person that is an EU institution, body or agency acting as “joint-controllers”) processing personal data as described in the corporate privacy statement or is entitled by law; 2. any natural/legal person with whom the Commission is under regulatory duty; or who needs the data in the public interest, if the recipient needs the data for legitimate performance of tasks within its competence (such as: authorised persons representing the Member States; EEA countries; and associated countries (if relevant for the programme) in various programming/legislative bodies (programme committees; advisory groups; national authorities/agencies; national contact points etc.); authorised persons representing the industry in the case of the EU joint-undertakings’ operations etc.); 3. any natural/legal person who has a contractual relationship with a joint-controller and who is working on behalf of 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 (external experts; authorised staff of contractors acting as processors for a specific processing operation (external auditors; event organisers etc.) <p>Transmission is restricted to the information necessary for the legitimate performance of their tasks. Recipients are reminded of their obligation not to use the data received</p>



		<p>for other purposes than the one for which they were transmitted. If the transfer entails a change of purpose, it is expressly provided for in law and the data subject is informed of it.</p> <p>Further specific disclosure:</p> <ul style="list-style-type: none">• Partner organisations chosen by the participant and included in participant's grant;• For certain programme/initiative related online publication: based either on the participation conditions of the specific programme/initiative or on data subject's consent, the recipient is the general public;• In accordance with the Financial Regulation (and in particular its Article 38 et al), certain information on recipients of EU funds are published annually on the Financial Transparency System; in the Official Journal of the European Union; and/or on the applicable website of the Commission. <p>Pursuant to Art 3(13) of the Regulation, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the 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.</p> <p>Disclosure to recipients is exercised in compliance with the principles of "necessity" and "data minimisation". The natural persons further abide by statutory obligations and, when required, additional confidentiality agreements. Recipients are reminded of their obligation to process the personal data provided to them only for the purposes for which they were transmitted.</p>
12	Are there any transfers of personal data to third countries or international organisations? If so, to which ones and with which safeguards?	<p>Data is transferred to countries outside the EU or EEA</p> <p><input checked="" type="checkbox"/>yes</p> <p>Transfer outside of the EU/EEA may occur in the context of evaluation/monitoring of grants/prizes by experts from non-EU/EEA countries; sharing of project information</p>



with National Contact Points and Programme Committee Members from non-EU/EEA associated countries. The transfer is necessary for the REA to carry out its budget implementation tasks; comply with its obligations under the applicable legislation and the agreements with the beneficiaries. No countries are automatically excluded by data transfers.

Data is transferred to international organisation(s)

yes

When necessary for the REA to carry out its budget implementation tasks; comply with its obligations under the applicable legislation and the agreements with the beneficiaries.

The legal base for the data transfer

- Transfer on the basis of the European Commission's adequacy decision (Article 47).

The specific adequacy decision

All adopted adequacy decisions

- Transfer subject to appropriate safeguards (Article 48.2)
 - Standard data protection clauses adopted by The Commission

Derogations for specific situations (Article 50.1 (a) - (g))

Are there derogations for specific situations (Article 50.1(a)-(g))

Yes, 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 data subject has explicitly consented to the proposed transfer, after having been informed of the possible risks of such transfers for the data



		<p>subject due to the absence of an adequacy decision and appropriate safeguards;</p> <ul style="list-style-type: none">• The transfer is necessary for the performance of a contract between the data subject and the entity of the controller or the implementation of pre-contractual measures taken at the data subject's request;• The transfer is necessary for the conclusion or performance of a contract concluded in the interest of the data subject between the entity of the controller and another natural or legal person. <p>Description of the indicated condition(s) that apply(ies) for the derogation(s)</p> <p>Explicit consent (requested by email, via EU Survey etc.) is obtained and managed by the responsible controller in full compliance with the Regulation. The transfer is necessary for the performance of a Grant Agreement or a prize between the data subject and the controller. The transfer is necessary for the conclusion or performance of a contract (e.g. with evaluators/monitors) concluded in the interest of the data subject between the controller and another natural or legal person.</p>
	<p><u>General</u> description of the technical and organisational security measures</p>	<p>The datasets are safeguarded in the Data Center of the Commission and therefore covered by the numerous defensive measures implemented by DIGIT to protect the integrity and confidentiality of the electronic assets of the Institution.</p> <p>The login and the passwords are managed by the common certification service of the European Commission (ECAS).</p> <p>The responsible human resource managers in REA have access to the specific data they need to fulfil their management tasks. All further access to other persons must be communicated to the staff member concerned.</p> <p>The processors have put into place the relevant technical and organisational security measures to protect the data subjects' rights whose personal data are processed.</p>



14	<u>Data subject rights/restrictions</u>	<p>A data subject can exercise his/her rights (Art 14-27 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 the Regulation) by sending their request to REA-LEGAL@ec.europa.eu.</p> <p>They may be restricted only under certain specific conditions as set out in the applicable Restriction Decision in accordance with Article 25 of the Regulation. Restrictions may also apply due to communication of a personal data breach or due to the confidentiality of electronic communications.</p> <p>Further to the above, data subjects may contact the REA Data Protection Officer (DPO): REA-DATA-PROTECTION-OFFICER@ec.europa.eu</p> <p>In case of conflict, complaints can be addressed to the European Data Protection Supervisor: EDPS@edps.europa.eu</p>
15	Information to data subjects/Data protection notice (DPN)	<p>A Data Protection Notice (DPN) relevant to this data processing is available under legal notices on the EU Funding & Tenders Portal: privacy-statement_en.pdf. It is also published on the REA public central register of records and it is transmitted by the data controller to the data subjects, where applicable.</p>