

# ELECTRONIC PLATFORM SUBMISSION SYSTEM (EPSS) GENERAL DATA PROTECTION POLICY



# 1. Introduction

The Water4All Partnership is a European partnership under the European Commission's Research & Innovation Framework Programme Horizon Europe, that supports international research & innovation projects through transnational co-funded Calls. This EPSS Data Protection Policy shows how the Water4All Partnership is committed to protecting and respecting the privacy of Applicants, Evaluators, Researchers selected for funding and any general users of the EPSS.

This EPSS Data Protection Policy and associated policies are designed to be compliant with the EU's General Data Protection Regulation (2016/679) (GDPR), management of joint calls, including the evaluation of proposals, as well as the design, and learning process in Joint Calls require the processing of personal data, including those of persons in the non-EU countries.

The EPSS Data Protection Policy is a transparent statement that explains the reason for the collection and processing of your personal data, the way we protect the personal data provided and what rights you may exercise in relation to your data (the right to transparency, information, access, rectification and erasure, portability, object, block etc.).

This EPSS Data Protection Policy concerns the processes associated with:

- partner / project search tool (1),
- application submission (2)
- application evaluation by an independent International Evaluation Committee – IEC (namely processes that concern personal data of the members of the IEC) (3),
- application eligibility check (4)
- general use of the EPSS (5).

The EPSS is supported by an Estonian contractor, Taavi Tiirik. The data input by users from all over the globe are received directly into Estonian Research Council's (ETAg) servers in Estonia, which are maintained by EENet (Estonian Education and Research Network of Information Technology Foundation for Education) using industry best practices for data security. The Water4All Partnership is hereby making the benefits of these GDPR compliant policies available to all users regardless of geographic location. The EPSS maintains data related to Joint Calls and associated processes detailed in Annex 1. Changes to this Annex do not constitute a change to the EPSS Data Protection.

## 2. Why do we proceed your data

### PURPOSE OF THE PROCESSING

The data provided to us and the purpose of our processing of these data are different for (1) partner / project search tool, (2) application submission, (3) application evaluation by an independent International Evaluation Committee, (4) application eligibility check, (5) general use of the EPSS. The purpose of processing the data for each of these roles are as follows:

Partner / Project search tool (by users of the tool)

The data you provided as a user of the Partner / Project search tool are used to:

- Publish your partner / project search request and help you find potential partners for your project or a project you could join as partner
- Collect your feedbacks on the tool

### Application Submission (by Applicants)

The data you provide as an Applicant in your application forms (both pre-proposal and full proposal forms) are collected to allow the Water4All Partnership, members of the international evaluation committee and funding organisations and the European Commission to:

- communicate with you about the call and application process
- allow the funding organisations to perform an eligibility check of the applicants
- assess the composition, competencies and complementarities of your proposal and consortia by the IEC members
- award funding if your application is successful
- analyse and describe our applicant pool (the name of applicants are anonymised in our analysis)
- collect your feedbacks and improve our communications with potential future applicants in future Joint Calls

### Application Evaluation (by members of the IEC)

The data you provide, as a member of the International Evaluation Committee allow us to:

- communicate with you about the call and review process
- assign applications for your review
- collect your evaluation of those applications
- collect your feedbacks on the review process
- communicate on and publish the composition of the IEC

### Application Eligibility check (by Funding organisations)

The data you provide or the data that are provided on you, as a funding organisation representative, allow us to:

- communicate with you about the eligibility check process
- give you access to the proposals submitted for which you have to enter an eligibility decision
- collect your eligibility check decisions

### General use of the EPSS (by any users of the EPSS)

The data you provided as a user of the EPSS are used to:

- ensure the security of the EPSS
- ensure the proper functioning of the EPSS

## LAWFULNESS OF THE PROCESSING

The Water4All Partnership has a legitimate interest in processing these data to meet obligations laid down by law in funding countries, including non-European Union Member countries, meeting obligations to which the Water4All Partnership is subject, and the necessity for the performance of a contract to which the data subject is a party. (This basis is described in GDPR 2016/679 Art. 6-1-b, GDPR 2016/679 Art. 6-1-C, in GDPR 2016/679 Art. 6-1-f for personal data of application evaluation by external review only). The organisations providing resources and funding for the Joint Calls are subject to obligations laid down by law for the application, review, and award processes. The Water4All Partnership and the EPSS processor are directly linked to these obligations.

The EPSS is contracted by the Agence Nationale de la Recherche (ANR).

### 3. Which data do we collect and process?

The data we collect and process are different for (1) partner / project search tool, (2) application submission, (3) application evaluation by an independent International Evaluation Committee, (4) application eligibility check, (5) general use of the EPSS. The purpose of processing the data for each of these roles through the EPSS system are as follows:

#### **Partner / Project search tool (by users of the tool)**

The data subject are:

- The users of the partner / project search tool. Collected personal data: Title, first and last name, country, organisation and department, e-mail address, phone number, personal webpage, link to research gate webpage (or equivalent), expertise, skills and disciplines.

#### **Application Submission (provided by the proposal participants: coordinators, principal investigators of the partners, self-funded partners and subcontracting parties)**

The data subjects are:

- Coordinators and Principal Investigators (PIs) of the participants

Collected personal data: First name, last name, professional email address, title, gender, nationality, ORCID ID, professional website, professional phone number, professional and/or other status, career Stage, employment status information, funding body and duration of contract, curriculum vitae (education record, positions, major achievements, publications, IP, awards, others responsibilities).

Details of the organisation: Legal organisation full name and acronym, organisation website, Participation Identification Code (PIC), organisation type, status (including small or medium-sized enterprise), NACE code, organisation division/department/unit or laboratory, organisation address, expertise/area(s) of research / academic discipline(s)

- Other Team Members

Collected personal data: First name, last name, title, professional email address, ORCID ID, gender, career stage, nationality, and curriculum vitae

#### **Application Evaluation (provided by the members of the International Evaluation Committee, the Call Steering Committee, the Joint Call Secretariat)**

The data subjects are:

- Potential members of the International Evaluation Committee

Collected personal data: First Name, Last Name, Name of their Organisation and department, E-mail address, keywords to describe their expertise and disciplines, organisation or personal website.

These data are provided by the members of the Call Steering Committees and the Joint Call Secretariat.

- Actual Members of the International Evaluation Committee

Collected personal data: First Name, Last Name, Organisation Name, Nationality, Country of their Organisation, expertise / areas of research / academic disciplines, pre-assessments and reviews made, scoring data, final feedbacks for applicants.

#### **Application eligibility check (provided by Funding Organisations).**

The data subjects are:

- Representatives from the participating Funding Organisations

Collected personal data: First and Last name, e-mail address, organisation name, eligibility decision.

## General use of the EPSS (provided by any user of the EPSS)

The data subjects are:

- **all the users of the EPSS who uses the following pages of the EPSS:** submitting a new partner / project search entry, new user registration, login page, lost your password page.

Collected personal data: evidences that the user of the EPSS is not a robot.

In all cases above, "organisation" information includes the organisation's name, website, street address, city/town, state, country, and postal code.

The EPSS will not collect or process sensible personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health, data concerning a natural person's sex life or sexual orientation, ideological views or activities, information on social security measures, or administrative or criminal proceedings and sanctions, which are treated outside pending proceedings. (These are "special categories" of data under GDPR Article 9 and are not collected or processed by the EPSS and the Water4All Partnership).

## 4. How long do we keep your data?

### Partner / Project search tool (by users of the tool)

The data subject are:

The users of the partner / project search tool: personal data are kept for one year after the closure of the application.

### Application Submission (provided by the proposal participants: coordinators, principal investigators of the partners, self-funded partners and subcontracting parties)

The data subjects are:

- Coordinators of each proposal and other Principal Investigators (PIs), Other Team Members, when relevant, not selected for funding: for up to 5 years<sup>1</sup> after the closure of the call for which the data have been collected or updated, or, concerning calls with multiple cut-offs. This applies also to data contained in previous outdated versions of applications and in withdrawn proposals in case the proposal was not selected for funding.
- Coordinators of each proposal and other Principal Investigators (PIs), Other Team Members, when relevant: selected for funding: Information on researchers selected for funding through a Joint Call, personal data (in electronic and/or any other format) are retained for 15 years<sup>2</sup> after the closing of the Joint Call.
- You have the possibility to ask us to get the information changed or removed (in case your proposal was not submitted)

### Application Evaluation (provided by the members of the International Evaluation Committee, the Call Steering Committee, the Joint Call Secretariat)

The data subject are:

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<sup>1</sup> In some funding organisations, depending on national requirements, this retention period may be shorter. For more information, you can contact your funding organisation.

<sup>2</sup> In some funding organisations, depending on national requirements, this retention period may be shorter. For more information, you can contact your funding organisation.

Potential members of the International Evaluation Committee, Actual Members of the International Evaluation Committee: personal data are kept for up to 5 years after the closure of the call.

### Application eligibility check (provided by Funding Organisations)

The data subjects are:

Representatives from the participating Funding Organisations: personal data are kept for up to 5 years after the closure of the call.

### General use of the EPSS (provided by any user of the EPSS)

The data subjects are:

All the users of the EPSS who uses the following pages of the EPSS: submitting a new partner / project search entry, new user registration, login page, lost your password page: personal data are kept for up to 5 years after the closure of the call except for applicants selected for funding (15 years).

Anonymised data can be retained for a longer period and further processed for historical, statistical, or scientific purposes.

## 5. How do we protect your data?

All data in the EPSS are stored on the Estonian Research Council's (ETAg) servers in Tartu, Estonia, which are maintained by EENet (Estonian Education and Research Network of Information Technology Foundation for Education). The operations of these services comply with industry best practices and the EU's General Data Protection Regulation (2016/679) (GDPR) appropriate measures. Any development computers / environments that are involved in building and testing the EPSS outside the server room, are using strongly encrypted storage media, to further reduce the risk of unauthorised access to the data.

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

### Sharing of Your Information

Your data will be accessible to the Joint Call Secretariat, funding organisations participating in the call and their contractors, independent observer nominated for joint calls co-funded by the European Commission and the contractor supporting the EPSS system. (EPSS is supported by Taavi Tiirik). Additionally, data in applications will be accessible by application International Evaluation Committee members solely for the purpose of reviewing the submitted proposals and providing their review.

The EPSS General Data Policy maintains a list of participating countries and funding organisations for each Joint Call in [Annex 2](#). Changes to this Annex do not constitute a change to the EPSS General Data Policy.

### Future Sharing of Your Information

We do not currently share your personal information with companies, organisations, or individuals outside the ones mentioned in section 6.1. If the need arises, we may share your information in the following cases:

#### Future Sharing with your consent:

We will share personal information outside of the Water4All Partnership when we have your consent. We will ask for your explicit consent to share any sensitive personal information.

#### Future Sharing for external processing:

We would provide personal information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures.

#### Future Sharing for legal reasons:

We will share personal information outside of the Water4All Partnership if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:

- Meet any applicable law, regulation, legal process, or enforceable governmental request.
- Enforce applicable Terms of Service, including investigation of potential violations.
- Detect, prevent, or otherwise address fraud, security, or technical issues.
- Protect against harm to the rights, property or safety of the Water4All Partnership, our users, or the public as required or permitted by law.

## Export of data to non-EU countries

The data we collect and process are different for (1) partner / project search tool, (2) application submission, (3) application evaluation, (5) application eligibility check, (6) general use of the EPSS. Please note, that some of the personal data you provide us will be exported to non-EU countries participating to the call (see Annex 2 for the list of non-EU countries participating in each Joint Call).

Partner / Project search tool (data provided by users of the tool)

These data **will not be exported** to non-EU countries (third countries) and will remain on the servers of the EPSS (check section 5 for more information).

Application Submission (data provided by the proposals' applicants)

These data will be shared among all the Funding Organisations participating in the call, for the proper implementation of the Joint Call. Please note that some of these Funding Organisations are not established in an EU member States. To ensure a high level of data protection, these funding organisations agreed to ensure a high level of protection to your personal data. In addition, for transparency reasons, when applying to the Joint Call and when collecting your data, we inform you on the need to transfer your personal data to non-EU member States for the proper evaluation and implementation of the Call. If a Funding Organisation is not from the European Union or the European Economic Area and do not provide an adequate level of data protection<sup>3</sup>, we will ensure that such a transfer is possible and complies with the GDPR (i.e. pursuant to Article 45 of the GDPR – on the basis of an adequacy decision or pursuant to Article 46.2.c) of GDPR – on the basis of standard data protection clauses adopted by the Commission in accordance with the examination procedure in Article 93.2 or pursuant to Article 49 of the GDPR).

Application Evaluation (data provided by the members of the International Evaluation Committee, the Call Steering Committee, the Joint Call Secretariat)

The data subject are:

- Potential members of the International Evaluation Committee:

These personal data are shared with the funding organisations participating in the Joint Call to ensure the proper implementation of the evaluation process. Please note that some of these funding organisations are not established in an EU member States; your personal data will thus be shared with non-EU funding organisations but these organisations are committed to ensure a high level of data protection. If a Funding Organisation is not from the European Union or the European Economic Area and do not provide an adequate level of data protection, we will ensure that such a transfer is possible and complies with the GDPR (i.e. pursuant to Article 45 of the GDPR – on the basis of an adequacy decision or pursuant to Article 46.2.c) of GDPR – on the basis of standard data protection clauses adopted by the Commission in accordance with the examination procedure in Article 93.2 or pursuant to Article 49 of the GDPR).

- Actual Members of the International Evaluation Committee:

These personal data are shared with the funding organisations participating in the Joint Call to ensure the proper implementation of the evaluation process. As some of the funding organisation are not established an EU member States, please note that your personal data will be shared with non-EU Funding Organisations but

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<sup>3</sup> As defined by the European Commission: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en)

these organisations are committed to ensure a high level of data protection and signed a non-disclosure policy. If a Funding Organisation is not from the European Union or the European Economic Area and do not provide an adequate level of data protection, we will ensure that such a transfer is possible and complies with the GDPR (i.e. pursuant to Article 45 of the GDPR – on the basis of an adequacy decision or pursuant to Article 46.2.c) of GDPR – on the basis of standard data protection clauses adopted by the Commission in accordance with the examination procedure in Article 93.2 or pursuant to Article 49 of the GDPR).

Application eligibility check (data provided by Funding Organisations)

The data subjects are:

- Representatives from the participating Funding Organisations:

These personal data are shared with all the Funding Organisations participating in the Joint Call, including non-EU ones, to ensure the proper implementation of the evaluation process. Please note that your personal data will thus be shared with non-EU funding organisations but these organisations are committed to ensure a high level of data protection and signed a non-disclosure policy. If a Funding Organisation is not from the European Union or the European Economic Area and do not provide an adequate level of data protection, we will ensure that such a transfer is possible and complies with the GDPR (i.e. pursuant to Article 45 of the GDPR – on the basis of an adequacy decision or pursuant to Article 46.2.c) of GDPR – on the basis of standard data protection clauses adopted by the Commission in accordance with the examination procedure in Article 93.2 or pursuant to Article 49 of the GDPR).

General use of the EPSS (provided by any user of the EPSS)

The data will not be shared with non-EU countries (third countries).

Please note that no special categories of personal data, as defined by article 9 of the General Data Protection Regulation 2016/679 will be transferred to non-EU countries (third countries). Your personal data transferred to non-EU countries will not be used for commercial reasons.

## 7. What are your rights and how can you exercise them?

The rights granted by the EU's [General Data Protection Regulation \(2016/679\)](#) can be exercised on the EPSS. Namely, you are entitled to access your personal data and rectify/block or erase them in case the data are inaccurate or incomplete. You can exercise your rights by emailing [Water4All-CallsFR@agencerecherche.fr](mailto:Water4All-CallsFR@agencerecherche.fr) (Joint Call Secretariat) or the Data Protection Officer (DPO) of your funding organisation.

Each will reply to requests within one month of receipt of the request

## 8. Notices for EPSS Users

### Providing Others' Personal Data

Do not provide personal data about others unless you are authorised or required to do so by contract or applicable law.

### User Responsibilities

EPSS system users must comply with this statement and may not take any actions to subvert the processes associated with this statement. Those with access to these data are reminded of their obligation to process the personal data provided to them only for the purposes for which they were transmitted.

### Contact information

If you have comments or questions, any concerns or complaints regarding the collection and use of your personal data, please feel free the Joint Call Secretariat at [Water4All-CallsFR@agencerecherche.fr](mailto:Water4All-CallsFR@agencerecherche.fr) or the Data Protection Officer of your funding organisation.



Persons in European Union Member countries may also contact their supervisory authority established in a relevant Member State or other national office responsible for GDPR compliance.

## ANNEX 1: Data Maintained per Joint Call and Process

<b>Joint Calls' Short Name*</b>	<b>Application Receipt</b>	<b>Application Evaluation</b>
2023 Joint Call	X	X

\*Full call names and descriptions are available at <https://www.water4all-partnership.eu/>.

## ANNEX 2: List of countries and participating funding organisations per joint call

	Country	Funding Partner Organisation	Acronym
1	Austria	Fonds zur Förderung der wissenschaftlichen Forschung	FWF
2	Belgium	Flanders foreign investment office	FIO
3	Belgium	Fonds Voor Wetenschappelijk Onderzoek-Vlaanderen	FWO
4	Belgium	Fonds de la Recherche Scientifique	F.R.S.-FNRS
-	Brazil*	Brazilian National Council of State Funding Agencies	CONFAP
6	Brazil*	Brazilian National Council for Scientific and Technological Development	CNPq
7	Czechia	Technology Agency of the Czech Republic	TA CR
8	Denmark	Innovation Fund Denmark	IFD
9	Estonia	Sihtasutus Eesti Teadusagentuur	ETAg
10	Finland	Research Council of Finland	AKA
11	Finland	Ministry of the Environment	YM
12	France	Agence Nationale de la Recherche	ANR
13	Greece	General Secretariat of Research & Innovation	GSRI
14	Hungary	Nemzeti Kutatási, Fejlesztési és Innovációs Hivatal	NKFIH
15	Ireland	Environmental Protection Agency of Ireland	EPA
16	Italy	Ministero dell'Università e della Ricerca	MUR
17	Italy	Ministero dell'Industria e del Made in Italy	MIMIT
18	Israel	Ministry of Energy	MoE
19	Latvia	Latvijas Zinātnes padome	LZP
20	Lithuania	Lietuvos mokslo taryba	LMT
21	Luxembourg	Luxembourg National Research Fund	FNR
22	Malta	Ministry for Environment, Energy and Enterprise	MEEE

23	Moldova*	National Agency for Research and Development	NARD
24	Netherlands	Dutch Research Council	NWO
25	Norway	Research Council of Norway	RCN
26	Poland	Narodowe Centrum Badań i Rozwoju	NCBR
27	Portugal	Fundação para a Ciência e a Tecnologia	FCT
28	Romania	The Executive Agency for Higher Education, Research, Development and Innovation Funding	UEFISCDI
29	Slovak Republic	Slovak Academy of Sciences	SAS
30	South Africa*	Water Research Commission	WRC and DSI
31	Spain	Agencia Estatal de Investigación	AEI
32	Spain	Centre for the Development of Industrial Technology	CDTI
33	Sweden	The Swedish Research Council for Environment, Agricultural Sciences and Spatial Planning	FORMAS
34	Switzerland	Swiss National Science Foundation	SNSF
35	Turkey*	Türkiye Bilimsel Ve Teknolojik Arastirma Kurumu	TUBITAK
36	United Kingdom	Engineering and Physical Sciences Research Council	EPSRC UKRI

\*Countries that are not in the EU or in the EEA. Standard Contractual Clauses will be signed.