



Sustainable Blue  
Economy Partnership

# Electronic Platform Submission System (EPSS) General Data Protection Policy

Sustainable Blue Economy  
Partnership



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EUROPEAN PARTNERSHIP



## **EPSS General Data Protection Policy**

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## 1.0 INTRODUCTION

The Sustainable Blue Economy 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 and Additional Activities, including the Transnational Access Call to Research Infrastructures [TA Call to RIs] made available by some partners of the Partnership.

This EPSS Data Protection Policy shows how the Sustainable Blue Economy Partnership is committed to protecting and respecting the privacy of Applicants, Evaluators, Researchers selected for access 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 TA calls to RIs, including the evaluation of proposals, as well as the design, monitoring and evaluation of calls, and learning process in TA Calls to RIs require the processing of personal data, including those of persons in the non-EU countries that might apply to this call.

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:

- application submission (1)
- application evaluation by an independent International Evaluation Panel – IEP, namely processes that concern personal data of the members of the IEP (2),
- application eligibility check (3)
- monitoring and evaluation of the call process (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 Sustainable Blue Economy 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.

## 2.0 WHY DO WE PROCESS YOUR DATA?

### 2.1 PURPOSE OF THE PROCESSING

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

#### 2.1.1 Application Submission (by Applicants)

The data you provide as an Applicant in your application forms are collected to allow the Sustainable Blue Economy Partnership, members of the International Evaluation Panel and RI providers, the European Commission to:

- o communicate with you about the call and application process
- o allow the TA Management Working Group to perform an eligibility check of the applicants
- o assess the composition, competencies and complementarities of your proposal and consortia by the IEP members
- o award access if your application is successful
- o analyse and describe our applicant pool (the name of applicants are anonymised in our analysis)
- o support you with potential uptake, including by mobilizing relevant partners of the Partnership
- o collect your feedbacks and improve our communications with potential future applicants in future TA Calls to RIs

#### 2.1.2 Application Evaluation (by members of the IEP)

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

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

### **2.1.3 Application Eligibility check (by the TA Management Working Group)**

The data you provide or the data that are provided on you, as the TA Management Working Group, allow us to:

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

### **2.1.4 Monitoring and evaluation of the call process (by the TA Management Working Group and RIs providers)**

The data you provided as the TA Management Working Group and RIs' providers representatives, are used to:

- o communicate with you about the monitoring and evaluation of the call process
- o help us assign you an appropriate role in the system to allow you to participate in the monitoring and evaluation of the call process
- o give you access to the appropriate data to perform your functions related to the monitoring and evaluation of the call process

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

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

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

## **2.2 LAWFULNESS OF THE PROCESSING**

The Sustainable Blue Economy Partnership has a legitimate interest in processing these data to meet obligations laid down by law in countries of the organizations providing access to RIs, meeting obligations to which the Sustainable Blue Economy 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 RIs for the TA Calls are subject to obligations laid down by law for the application, review, and award processes. The Sustainable Blue Economy Partnership and the EPSS processor are directly linked to these obligations.

The EPSS is contracted by the Estonian Research Council (ETAG).

## 3.0 WHICH DATA DO WE COLLECT AND PROCESS?

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

### 3.1 Application Submission (provided by the proposal participants: principal investigators of the partners)

The data subjects are:

#### o Principal Investigator (PIs) of the Project Leader

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, organisation type, status (private or public; if private: small or medium-sized enterprise, enterprise other than SME, other), NACE code, organisation division/department/unit or laboratory, organisation address, expertise/area(s) of research / academic discipline(s)

#### o Other PIs of Project Partners and Team Members

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

### 3.2 Application Evaluation (provided by the members of the International Evaluation Panel, the RIs Providers, the TA Management Working Group)

The data subjects are:

#### o Potential members of the International Evaluation Panel

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 TA Management Working Group upon input of the RI providers, the General Assembly of the Partnership as well as making profit of the portfolio of evaluators of the transnational Joint Calls #1 and #2 and/or the portfolio of evaluators from other relevant RI TA projects/networks.

o **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, evaluation reports, scoring data, final feedbacks for applicants.

### **3.3 Application eligibility check (provided by the TA Management Working Group).**

The data subjects are:

o **Representatives from the participating RI Providers** and the TA Management Working Group

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

### **3.4 Monitoring and Evaluation of the call process (by the TA Management Working Group and the RIs' Providers)**

The data subjects are:

o Monitors of the Evaluation process such as representatives of RIs providers and members of the TA Management Working Group.

Collected personal data: Email address, first name, last name, organisation.

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

The data subjects are:

o **all the users of the EPSS who uses the following pages of the EPSS:** submitting a new partner 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 Sustainable Blue Economy Partnership).

## 4.0 HOW LONG DO WE KEEP YOUR DATA?

### 4.1 Application Submission (provided by the proposal participants: principal investigators of the partners)

The data subjects are:

- Principal Investigators (PIs) of Project leaders and Partners, Other Team Members, when relevant, not selected for access: for up to 5 years 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 access.
- Principal Investigators (PIs) of Project leaders and Partners, Other Team Members, when relevant, selected for access: Information on researchers selected for access through a TA Call to RIs, personal data (in electronic and/or any other format) are retained for 15 years after the closing of the TA Call.
- You have the possibility to ask us to get the information changed or removed (in case your proposal was not submitted)

### 4.2 Application Evaluation (provided by the members of the International Evaluation Panel, the RIs' Providers, the TA Management Working Group)

The data subject are:

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

### **4.3 Application eligibility check (provided by the TA Management Working Group and the RIs' Providers)**

The data subjects are:

Representatives from the participating RIs' Providers and the TA Management Working Group: personal data are kept for up to 5 years after the closure of the call.

### **4.4 Monitoring and Evaluation of the call process (by the TA Management Working Group and the RIs' Providers)**

The data subjects are:

All monitors of the Evaluation process such as representatives of RIs' providers and members of the TA Management Working Group: personal data are kept for up to 5 years after the closure of the call.

### **4.5 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, 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 access (10 years).

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

## **5.0 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.

## 6.0 WHO HAS ACCESS TO YOUR DATA AND TO WHOM IS IT DISCLOSED?

### 6.1 Sharing of Your Information

Your data will be accessible to the TA Mangement Working Group, RIs providers participating in the call and the contractor supporting the EPSS system. (EPSS is supported by Taavi Tiirik). Additionally, data in applications will be accessible by application International Evaluation Panel members solely for the purpose of reviewing the submitted proposals and providing their review.

The EPSS General Data Policy maintains a list of RIs providers for each TA Call as listed in Annex 2. Changes to this Annex do not constitute a change to the EPSS General Data Policy.

### 6.2 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 Sustainable Blue Economy 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 Sustainable Blue Economy 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 Sustainable Blue Economy Partnership, our users, or the public as required or permitted by law.

## 6.3 Export of data to non-EU countries

The data we collect and process are different for (1) application submission, (2) application evaluation, (3) application eligibility check, (4) monitoring and evaluation of the call process, (5) general use of the EPSS. Please note that any RIs provider belong to a non-EU country.

### 6.3.1 Application Submission (data provided by the proposals' applicants)

These data will be shared among relevant RIs' providers participating in the call, for the proper implementation of the TA Call to RIs. Please note that all these Organisations are established in an EU member State. To ensure a high level of data protection, these RIs' provider organisations agreed to ensure a high level of protection to your personal data. In addition, for transparency reasons, when applying to the TA Call to RIs and when collecting your data, we inform you on the potential need to transfer your personal data to non-EU member States for the proper evaluation and implementation of the TA Call.

Application Evaluation (data provided by the members of the International Evaluation Panel, the RIs' Providers, the TA Management Working Group)

The data subject are:

- Potential members of the International Evaluation Panel:

These personal data are shared with the RIs' providers participating in the TA Call to RIs to ensure the proper implementation of the evaluation process. Please note that any RIs' providers belong to a non-EU country.

- Actual Members of the International Evaluation Panel:

These personal data are shared with the RIs' Providers participating in the TA Call to RIs to ensure the proper implementation of the evaluation process. Please note that any RIs' providers belong to a non-EU country. Application eligibility check (data provided by the TA Management Working Group and the RIs' Providers).

The data subjects are:

- Representatives from the participating RIs' Providers and the TA Management Working Group:

These personal data are shared with the TA Management Working Group and all the RIs' Providers making RIs available for the TA Call to ensure the proper implementation of the evaluation process. Please note that any RIs' providers belong to a non-EU country, thus your personal data will not thus be shared with non-EU organisations. Monitoring and Evaluation of the call process (by the TA Management Working Group).

These personal data are shared with all the participating RIs' providers in the TA Call to RIs to ensure the proper implementation of the evaluation process. Please note that any RIs' providers belong to a non-EU country.

### **6.3.2 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).

## **7.0 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 [sbepcallresearchinfra@mur.gov.it](mailto:sbepcallresearchinfra@mur.gov.it) (TA Management Working Group) or the Data Protection Officer (DPO) of the relevant RI's provider if applicable.

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

## **8.0 NOTICES FOR EPSS USERS**

### **8.1 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.

### **8.2 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.

## 8.3 Contact information

If you have comments or questions, any concerns or complaints regarding the collection and use of your personal data, please feel free to contact the Joint Call Secretariat at [sbepcallresearchinfra@mur.gov.it](mailto:sbepcallresearchinfra@mur.gov.it) or the Data Protection Officer of relevant RI's provider if applicable.

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 TA CALL AND PROCESS

<b>Joint Calls' Short Name*</b>	<b>Application Receipt</b>	<b>Application Evaluation</b>
2025 TA Call to RIs	X	X
2026 TA Call to RIs	X	X

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

## ANNEX 2: LIST OF COUNTRIES AND PARTICIPATING RIs PROVIDERS PER TA CALL

TA Call to RIs short Names*	Participating RIs' providers
2025 TA Call	<ul style="list-style-type: none"> <li>• <i>Portugal: AIR CENTRE; Atlantic International Research Centre</i></li> <li>• <i>Germany: AWI; Alfred Wegener Institute for Polar and Marine Research</i></li> <li>• <i>Germany: BSH; Federal Maritime and Hydrographic Agency of Germany</i></li> <li>• <i>Italy: CNR; Consiglio Nazionale delle Ricerche</i></li> <li>• <i>Germany: GEOMAR; Helmholtz Centre for Ocean Research Kiel</i></li> <li>• <i>Greece: HCMR; Hellenic Centre for Marine Research</i></li> <li>• <i>Italy: IIM; Istituto Idrografico della Marina Militare</i></li> <li>• <i>Germany: IOW; Leibniz Institute for Baltic Sea Research</i></li> <li>• <i>Ireland: MI; Marine Institute</i></li> <li>• <i>Italy: INGV; National Institute of Geophysics and Volcanology</i></li> <li>• <i>Italy: OGS; Istituto nazionale di oceanografia e di geofisica sperimentale</i></li> <li>• <i>Italy: SZN; Stazione Zoologica Anton Dohrn</i></li> <li>• <i>Germany: ZMT; Leibniz Zentrum für Marine Tropenforschung</i></li> <li>• <i>Spain: SOCIB; Sistema de Observación Costero de las Illes Balears</i></li> <li>• <i>Germany: TI; Thünen Institute for Biodiversity</i></li> <li>• <i>Romania: GeoEcoMar; National Institute for Research and Development of Marine Geology and Geoecology</i></li> </ul>