



EDCTP

European & Developing Countries
Clinical Trials Partnership

Privacy Statement on Grants Management

1. Introduction

This Privacy Statement states our reasons for collecting and processing your personal data, the way we protect your personal data, and the rights you may exercise in relation to your data.

The EDCTP-Association (EDCTP) is committed to protecting and respecting the privacy of applicants and its beneficiaries.

We currently manage one programme, EDCTP2, which is part of the European Framework Programme for Research and Innovation, Horizon 2020. The European Union (represented by the European Commission) and the EDCTP Association signed a Delegation Agreement in December 2014, under which the Commission entrusted budget implementation tasks to the EDCTP Association under Decision 556/2014/EU of the European Parliament and of the Council of 15 May 2014. The entrusted tasks include managing all stages (registration, grant proposal evaluation and awarding, grant management and follow-up) of Calls for Proposals. EDCTP (the Controller) collects personal data regarding these activities.

Applicants in the context used in this Statement refers to the legal entities that apply for funding through the submission of proposals. Beneficiaries are the successful applicants, i.e. participants in funded research action. Applications are submitted by principal investigators (or coordinator or lead applicant), the person who submits a proposal on behalf of the consortium via "EDCTPgrants", which is the online platform that EDCTP uses to process grant proposals submitted to EDCTP for funding. References made to grants in this document also apply to prizes.

2. Why do we process your data?

2.1 Purpose of the processing

The data you provide in "EDCTPgrants" are collected to allow EDCTP (the controller) to evaluate your proposal and/or organisation, to award funding if your proposal is successful, to manage grant agreements, and to fulfil its obligations towards its funders. The data may also be used for research purposes and/or for analysis at a programmatic level (which will, in principle, not involve the processing of personal data).

A limited subset of this information may be used by EDCTP for communication purposes, in accordance with the rules of each call for proposals or contest for prizes. EDCTP may also use the contact details of successful applicants to compile invitation lists for EDCTP conferences and other EDCTP organised events.

The contact details of administrative staff of beneficiaries may be shared with other interested parties (for example, funding agencies not involved in the action, researchers or journalists), but only after having received the unambiguous consent from the relevant data subjects.



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2.2 Lawfulness of the processing

The personal data collected by EDCTP in relation to EDCTP Calls for Proposals are processed based on a legal obligation, which include:

- Decision No 556/2014/EU of the European Parliament and of the Council of 15 May 2014 ('EDCTP2 Decision');
- The Delegation Agreement between the EU, represented by the EC, and EDCTP (following from the EDCTP2 Decision);
- Regulation (EU, Euratom) No 1966/2012 of the European Parliament and of the Council of 25 October 2012 ('Financial Regulation,' as declared applicable in the EDCTP2 Decision);
- Regulation (EU) No 1290/2013 of the European Parliament and of the Council of 11 December 2013 ('Horizon 2020 Rules for Participation' as declared applicable in the EDCTP2 Decision); and
- The relevant EDCTP2 Work Plans (following from the EDCTP2 Decision).

3. Which data do we collect and process?

The data subjects include principal investigators, other investigators, fellows, staff of applicants/beneficiaries with assigned roles in the proposals/projects. The data are collected directly or indirectly from the data subjects, and are necessary for our reporting and entering into a contract with the successful applicants.

A detailed overview of which data are collected during which stage of the procedure and for which purpose are set out below:

3.1 Registration EDCTPgrants

Proposals in response to any Calls for Proposals must be submitted via EDCTPgrants. During the registration process (creating a login account in EDCTPgrants) personal data, including contact and identification details, are collected:

- Title
- First Name
- Last Name
- Date of Birth
- Nationality
- Position
- Email
- Address (usually organizational)
- Gender.

At the registration stage, there is the option to submit a curriculum vitae (CV). This is optional when registering for EDCTPgrants, but a curriculum vitae is required when submitting a proposal (as it is required to determine operational capacity).



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3.2 Submission of a Proposal

To submit a proposal, a CV or description of the profile of the person who will be primarily responsible for carrying out the proposed research is required (in addition to the identification data mentioned above). Educational data necessary to determine the eligibility and/or experience necessary for the evaluations of the proposed action(s) may be included in CV. However, personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sexual orientation are not requested here (and will therefore only be present here if offered spontaneously). This kind of information will, in principle, not be processed, as it is not relevant for the application.

A proposal is submitted by a Coordinator (lead applicant). The proposal may include co-applicants (obligatory for RIA proposals.) The lead applicant must add details of other data subjects involved in the proposal. These data subjects must confirm their participation in the proposal to be submitted. This can either be done through EDCTP grants or the data subject must provide his/her unambiguous consent to the applicant/beneficiary in compliance with Article 5(d) of Regulation (EC) No 45/2001. The consent could be provided through the signature of a declaration of agreement (kept by each applicant/beneficiary and provided to the controller if there is a need for verification). A co-applicant (as invited by a lead applicant) can at any time inform EDCTP that he or she has been added to a proposal without their knowledge or permission and request for their data to be removed from the application.

In addition to the personal data of the lead applicant and other investigators, EDCTP will at the proposal submission stage also process personal data of all other individuals (data collected indirectly) included in the proposal. For fellowships this includes the name and contact details of the fellow's supervisor. These data are necessary for the evaluation of the proposal and for the grant agreement if the proposal is successful. By submitting the application, the lead applicants confirm that they have provided all staff with the Privacy Statement before submitting their data.

3.3 Grant preparation data

EDCTP will collect and process additional personal data for successful applicants in order to prepare and process the grant agreement. These include:

- The name of the legal representative of the lead applicant's organization and of all the co-applicants' organizations (collected in the legal entity form and declaration of honour);
- Bank account information and VAT number. This will, in principle, not be personal data, as EDCTP only signs grant agreements with legal entities;
- The name(s) of designated persons preparing financial reports within organizations receiving payments directly from EDCTP are collected as part of EDCTP's due diligence, which it must perform under the EDCTP 2 Decision (collected in the 'financial management questionnaire');
- Cost statements, including personnel costs which reflect the total remuneration, social security charges and other statutory costs (collected in the Budget form);
- Other categories of data: in compliance with Article 131(3) and 131(4) of Regulation (EU, Euratom) No 966/2012 (Financial Regulation). These include information contained in the declaration of honour, including the names person(s) representing them, members of their staff are not in one of the exclusion situations referred to in Article 106 (1), 107 and



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108 of the amended Financial Regulation, i.e., for example, bankruptcy, professional misconduct, fraud, or corruption; and

- Additional documentation may be requested in the framework of the ethics screening/review/monitoring of actions, including, for example (but not limited to), training certificates, licenses, authorizations from local/regional/national competent authorities, permissions for secondary use of personal data.

3.4 Publication of the personal and contact details

For successful applicants the name of the project coordinator, and in case of fellowships and prizes, the name of the fellow or prize winner is published on the EDCTP website (in addition to details regarding the funded action, such as, for example, the name of the action and the grant amount). This information may also be included in reports.

3.5 Grant monitoring

In fulfilling the reporting requirements set out Article 20 of the Grant Agreement), beneficiaries periodically submit reports, including a periodic technical and financial reports to EDCTP. These reports may contain personal data (e.g. names of participants, staff members, trainees). Any information provided to EDCTP in relation to 'a summary for publication by the EDCTP Association,' in the periodic technical report (Article 20.3 of Grant Agreement) and final report (Article 20.4 of the Grant Agreement) may be published by EDCTP on its website and in (publicly available) reports.

The information provided during the reporting is necessary for the monitoring of the implementation of the Grant Agreement and for the processing of payments under the Grant Agreement.

4. How long do we keep your data?

For audit purposes EDCTP is required to keep all (personal) data processed in relation to its Calls for Proposals for a period of five years after the final payment of the balance of EDCTP, which is expected to take place in 2026.

5. How do we protect your data?

All data submitted via EDCTP grants are stored on servers managed by CC technology (the processor) in the United Kingdom. Only authorized staff of CC technology has access to this information. All data are transmitted over a secure internet connection (encrypted).

All data in electronic format are stored on either EDCTP servers or on computers, laptops of EDCTP staff – with appropriate security measures in place.

All stakeholders involved in the evaluation and granting process (EDCTP staff, expert reviewers, scientific review members, the EDCTP Board, and the EC) are reminded to handle personal data confidentially and to use the personal data only for the purpose for which they were transmitted and to disregard all irrelevant and excessive data received with the proposals. Furthermore, all stakeholders are bound by the terms of the EDCTP Code of Conduct and Declaration of Interests policy, which assures confidentiality in the granting process.



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

All recipients are reminded of their obligation to process the personal data provided to them only for the purposes for which they are collected or transmitted.

Access to personal data is given to EDCTP staff without requiring the consent of the data subject.

The EDCTP Secretariat has an office in Europe (The Hague, the Netherlands) and in Africa (Cape Town, South Africa), but functions as one office. For this reason, personal data may be transferred from Europe to our South African office, particularly in relation to its management of all stages of its Calls for Proposals. The EDCTP Africa Office will process personal data as much as possible in accordance with the data protection laws of the Netherlands, and will in any case adhere to the data processing principles set forth in Annex A of the 'Standard contractual clauses for the transfer of personal data from the Community to third countries (controller to controller transfers).' (See Commission Decision of 27 December 2004 amending Decision 2001/497/EC as regards the introduction of an alternative set of standard contractual clauses for the transfer of personal data to third countries.) A data transfer agreement to this effect has been concluded between the two offices.

EDCTP staff, reviewers, advisory bodies and other external recipients are bound by the EDCTP Code of Conduct and Declaration of Interests policy, which assures confidentiality in the granting process.

Access to personal data is given to the following external recipients on need-to-know basis without requiring the consent of the data subject:

- CC Technology (the processor). Personal data submitted via EDCTPgrants are accessible by their authorized staff. EDCTP has concluded a processor agreement with CC Technology;
- Independent experts, contractors, and beneficiaries of actions who are working for or on behalf of and under the responsibility of the Controllers (EDCTP) for the purposes of evaluation of proposals, monitoring of grants, networking among beneficiaries, as well as design, monitoring and evaluation of the EDCTP2 Programme are provided with the necessary information for their purpose;
- External auditors;
- Authorized staff of partners in case of a joint Call – if a Call is organized together with another organization this will always clearly be stated in the Call text. Information is shared only for specific purposes (usually evaluation of proposals); and
- Authorized staff of the EC, as EDCTP is under the obligation to provide any information requested by the EC. All data transferred to the EC is processed pursuant to Regulation (EC) 45/2001.



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

In accordance with Regulation (EU) 2016/679 (GDPR) and Regulation (EC) No 45/2001, you are entitled to access your personal data and to rectify/block or erase them in case the data are inaccurate or incomplete.

You can exercise your rights by contacting the EDCTP data controller (see contact information in section 8 below) or follow the procedure described below:

- At the registration stage, you can log into EDCTPgrants and modify your personal data.
- At proposal preparation or application stage, you can modify, correct or delete any personal data before the end of the call deadline. Once the call deadline has passed, proposals are still available, but no further additions or corrections of personal data are possible. During the evaluation review procedure, modifying the information that has been submitted is not allowed.
- At the end of the evaluations, the legal entities whose proposals have been approved for funding, will be invited to start the grant preparation phase. During this period, the data subjects can modify and/or delete their personal data (included in the proposal) by requesting the assigned EDCTP Project Officer to do so.
- After the Grant Agreement has been signed and during the implementation of the action, the coordinator can request the assigned EDCTP Project Officer (the EDCTP communication contact point specified in Article 52.3 of the Grant Agreement) to modify and/or delete any personal information. Such changes may require a formal request for an amendment of the Grant Agreement (Article 55 of the Grant Agreement).

You also have the right of recourse at any time to the European Data Protection Supervisor.

8. Contact information

Should you have any comments or questions, concerns, or a complaint regarding the way EDCTP collects, processes and manages your personal data in relation to EDCTPgrants, its Calls for Proposals, and any of its grant management processes, please send an email to: info@edctp.org.