

PRIVACY POLICY MANAGEMENT OF THE CAJU PROGRAMME MANAGEMENT TOOL - PLANES

1. Introduction

The Clean Aviation Joint Undertaking (“CAJU”) is committed to protect and respect your privacy in compliance with Regulation 2018/1725 (hereinafter referred to as ‘the Regulation’). One of your rights under this Regulation is that you must be informed when your personal data - also known as personal information - is processed (collected, used, stored) by any EU organisation. You also have the right to know the details and purpose of JU’s processing operations related to your personal data.

On these pages you will find information about the of processing operations with regard to your personal and projects ‘data by in the Stakeholders Programme Management Tool - PLANES (hereinafter “PLANES”) by the CAJU.

2. Whose personal data do we process in PLANES?

This privacy statement concerns the following categories of data subjects:

- Concerned staff of Applicants: the legal entities that apply for funding through the submission of proposals for grants;
- Concerned staff of Beneficiaries: Applicants and participants in funded projects;
- Grand Agreement, registration and validation of participants¹;
- Experts registered on the Funding&Tenders Portal (F&T Portal)²;
- For Participant Register purposes (Participant Identification Code (PIC) central registration and validation purposes): (i) natural persons who are participants to grants or (ii) natural persons who represent or act in or have a certain role on behalf of the legal entities’ participant[-s/-ing] to EU tenders / grants / prizes.

This includes, for instance, Principal Investigators, Fellows, staff of Applicants/Beneficiaries with attributed roles in the proposals/projects (Primary Coordinator Contacts/Supervisors, Coordinator Contacts, Participant Contacts, Task Manager, Team Members, self-registrants, Legal Representatives (LRs), Legal Entity Appointed Representatives (LEARs), account administrators, natural persons as participants in their personal capacity, natural persons who are owners or governing body members of the participants etc-

The data is collected directly and indirectly from the data subjects. In compliance with the relevant Article of the Grant Agreement³, the Applicant/Beneficiary who provides

¹ Please too have additional information on the privacy policy of grants, visit https://www.clean-aviation.eu/sites/default/files/2021-10/Grants_0.pdf

² Please too see Privacy Policy applicable on experts, visit https://www.clean-aviation.eu/sites/default/files/2021-10/%CE%95xperts_0.pdf

³ For instance, networking among beneficiaries, as well as among fellows/researchers/staff members (including coordinators and supervisors) through the implementation of alumni services

the personal data of their staff or a third party to the Data Controller shall first provide them with this privacy statement.

3. What project data do we process via PLANES?

- Grant information on technical progress of the project: Demonstrators, technologies, maturity levels of deliverables and results, yearly progress and achievements;
- Grant Breakdown Structure: Work packages, tasks, deliverables and milestones;
- Project participants and their roles;
- Call proposals;
- Grant Agreement Annexes, including In kind, consumed resources and financial information;
- Project risks;

4. Why do we process your data?

4.1 Purpose of the processing

Purposes of the processing:

- identification of applicants and beneficiaries including their roles at the level of the Programme (private member, affiliated entity to a private member) and at the level of the projects (coordinator, beneficiary, third party, associated partner, international organisation, etc.)
- support for the grant management in SYGMA/COMPASS
- monitoring of technical progress and state of play of deliverables and milestones,
- technical and financial reporting including in-kind contributions and additional activities,
- impact monitoring at the level of the Programme,
- establishment of statistics and reports for the Executive Director and programme office, Governing Board and other CAJU's governance and advisory bodies.

4.2 On what legal grounds do we process your data?

Depending on each category the processing is necessary and lawful under:

- Article 5(1)(a) of the Regulation (processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body);
- Article 5(1)(b) of the Regulation (processing necessary for compliance with a legal obligation to which the controller is subject);
- Article 5(1)(c) of the Regulation (processing necessary for the performance of a contract to which the data subject is a party);
- Article 5(1)(d) of the Regulation (explicit consent of the data subject).

5. Which personal data do we process?

The following data are collected and processed:

5.1 Identification and contact data

Personal data is collected via the /F&T Portal and migrated to PLANES or directly via PLANES following inputs received from data subject's organisations.

General remarks:

- The address, city, country, telephone and fax numbers, bank account numbers as well as e-mail addresses provided in the proposal are usually the professional ones related to the legal entity submitting the application and executing the grant. Thus, as a general rule (with the exception of cases where the applicant is a natural person or when self-registrant or account administrator submit their contact details), private addresses or bank account numbers etc. are not processed

5.2 Proposals retained for successful proposals

For successful proposals, personal data are collected and further processed for the purposes of Grant Agreement preparation and management.

5.3 Grant Agreements

For the grant agreements, personal data are collected and further processed for the purpose of project and Programme implementation, technical and financial reporting, update of the CAJU's membership structure, monitoring of the technical progress and impact at the level of the thrust and the Programme. For more information, please consult the Clean Aviation Data Protection Register <https://www.clean-aviation.eu/clean-aviation-data-protection-register> as well as the privacy statement on grants https://www.clean-aviation.eu/sites/default/files/2021-10/Grants_0.pdf

6. How long do we keep your data?

The Data Controllers only keep your personal and Grant data for the time necessary to fulfil the purposes described above of collection or further processing.

For each category of data subjects concerned, please find below the retention details in line with the applicable CAJU retention list:

- For beneficiaries receiving EU funding, personal data is retained for 10 years after the end of the year following closure of the action.

- Pursuant to Article 4(1)(e) of the Regulation, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of beneficiaries for scientific research and/or statistical purposes for up to 25 years,⁴ unless you exercise your right to object under Article 23 of the Regulation;
- For unsuccessful applicants, personal data are retained for up to 5 years after the closure of the call for which the data have been collected or updated. For calls with multiple cut-off dates, personal data are retained for up to 5 years after the date of the cut-off following the submission of the proposal. Pursuant to Article 4(1)(e) of the Identification (title, name, surname or Researcher ID, when provided) and contact details (e-mail) of scientific staff of beneficiaries. Regulation, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of unsuccessful applicants for scientific research and/or statistical purposes for up to 25 years,⁵ unless you exercise your right to object under Article 23 of the Regulation;

In any case, personal data contained in supporting documents are deleted where possible when these data are no longer necessary for budgetary discharge control and audit purposes.

7. How do we protect your data?

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Commission, the CAJU or its contractors processing personal data in compliance with the Regulation.

All processing operations are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission, which applies to the CAJU mutatis mutandis.

The contractors of the CAJU are bound by specific contractual clauses and confidentiality clauses for processing operations of your data on behalf of the Joint Undertaking, and by the confidentiality obligations deriving from the General Data Protection Regulation in the EU Member States ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the Data Controller has put in place a number of technical and organisational measures. Technical measures include appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. Organisational measures include restricting access to the personal data solely to authorised persons with a legitimate need to know for the purposes of each processing operation.

⁴ Identification (title, name, surname or Researcher ID, when provided) and contact details (e-mail) of scientific staff of beneficiaries.

⁵ Identification (title, name, surname or Researcher ID, when provided) of scientific staff of applicants.

Access rights and controls are secured via the EU Login granted to persons authorised to get access to specific information (call management, grant management etc.)

All stakeholders involved in the evaluation and granting process are reminded to use the personal and project data received only for the purposes for which they were transmitted and to not further process any irrelevant and excessive data received with the proposals.

PLANES ensures the security and confidentiality of personal and grant data. Access to the data within the tool is restricted depending on the profiles of the users (JU staff/coordinator access).

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

Access to your personal data is provided to authorised staff of the Data Controller responsible for carrying out each processing operation based on the necessity and data minimisation principles. Such staff abide by statutory, and when required, additional confidentiality agreements.

Due to operational reasons, upon signature of the grant agreement, your proposal and its annexes may be made available to third parties, such as contractors in charge of handling the CAJU IT systems and in charge of running the project management tool of the CAJU. The CAJU endeavours to ensure such contractors respect the confidentiality of data and implement data protection safeguards to guarantee the security of personal or other data.

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

You have the right to access your personal data, the right to rectify them, if necessary, and/or to restrict its processing or erase them, if applicable. You are also entitled to object to the processing of your personal data, where applicable.

If you would like to exercise your rights under the Regulation, if you have comments, questions or concerns, regarding the collection and use of your personal data, please feel free to contact the Data Controller as explained in section 10 below.

You can at any time directly access or rectify your personal data in PLANES online. You may also change your EU Login password, which allows you to login to the system and update your personal information contained in your profile.

For more information, please refer to the Clean Aviation data protection legal notice <https://www.clean-aviation.eu/data-protection-legal-notice>

You may contact the Data Protection Officer of the Data Controller and, if necessary, the European Data Protection Supervisor with regard to issues related to the processing of your personal data under the Regulation.

NB: Please note that access to your personal and grant data and its modification or deletion may be restricted by the CAJU Internal Rules restricting data subjects rights⁶ as provided for by Article 25 of the Regulation. This is in order to safeguard the rights of other data subjects and/or to respect the principles of equal treatment among applicants and/or the secrecy of deliberations. In that context, these rights may be restricted by the CAJU on a case-by-case basis in line with the Internal Rules, where necessary and appropriate for the purposes. This restriction shall be proportionate to what is strictly necessary for the purpose of the processing.

10. Contact information

In case you have any questions or queries, any concerns or a complaint regarding the collection and use of the data protection at the Clean Aviation Joint Undertaking, please feel free to contact the Data Protection Officer at Data-Protection@clean-aviation.eu

⁶ Adopted on 16 December 2021 by the CAJU Governing Board, as part of the Omnibus Decision CAJU-GB-2021- 12-16, by which the Decision of the Governing Board laying down internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Clean Sky 2 Joint Undertaking CS-GB-Writ proc 2020-02, are directly transferred and shall apply to CAJU.