



RECORD OF PERSONAL DATA PROCESSING ACTIVITY

Based on **Article 31 of the Regulation (EU) 2018/1725¹** on the protection of natural persons with regards to the processing of personal data by the Union Institutions, bodies, offices and agencies and on the free movement of such data, each responsible EASME data controller has to maintain a record of the processing activities under his/her responsibility.

Record No: R-2021-01

Initial approval by Data Controller: *see date of Ares signature*

Previous Notification (if applicable): *N/A*

Update (s) (if applicable): *N/A*

NAME OF THE PROCESSING ACTIVITY

EIC IT Platform

IDENTIFICATION OF THE DATA CONTROLLER

European Innovation Council and SMEs Executive Agency (EISMEA), Director,
EIC Fund, Chairperson of the EIC Fund Board of Directors

GROUND FOR THIS RECORD (select relevant ground)

- Record of a new type of processing activity of personal data (before its implementation)
- Record of a processing activity of personal data that is already in place (ex-post)
- Change/Amendment/ Update of an already existing previous record (or previous notification to DPO)

DESCRIPTION OF THE PROCESSING ACTIVITY

The processing of personal data related to the Submission, Selection, Negotiation and Management of applications and subsequent grant/contracts to the EIC Programme under the Horizon Europe Programme via the EIC IT Platform.

¹ [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 (OJ L 295/39 of 21.11.2018).

1. INFORMATION ON THE PROCESSING ACTIVITY of the EIC IT Platform

This processing activity is performed in accordance with **Regulation (EU) No 2018/1725**² on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

1.1. The joint Data Controllers of this processing operation are:

- The **European Innovation Council and SMEs Executive Agency (EISMEA)**³, place Rogier 16, B-1049 Brussels represented by its Director, in charge of the implementation of the EIC programme under the Horizon Europe Programme.
- The **EIC Fund**, represented by the Chairperson of the EIC Fund Board of Directors, 15 Boulevard Friedrich Wilhelm Raiffeisen, LU-2411 Luxembourg, in charge of the investment component of the EIC Accelerator⁴.

In addition, the following **entities process** personal data on behalf of the joint controllers:

1. **The Innovation Loop SAS**, 165 avenue de Bretagne, 59000 Lille, France, support@innoloop.eu.
The Innovation Loop SAS develops and manages for the EIC part of the IT solution for the submission, evaluation and negotiation process of the EIC Accelerator.
2. **EIB – European Investment Bank**, 98-100, boulevard Konrad Adenauer – L-2950 Luxembourg, <https://www.eib.org/fr/infocentre/contact/index.htm>.
The EIB undertakes for the EISMEA / EIC Fund the due diligence process in the context of EU funded equity for beneficiaries.
3. **Alter Domus Luxembourg S.à.r.l.**, 15 Boulevard F. W. Raiffeisen – L-2411 Luxembourg, BP 2501, L-1025 Luxembourg, <https://www.alterdomus.com/contact-us>.
Alter Domus:
 - performs additional data collection and checks of potential beneficiaries of the EU funded equity component through the ‘Know your Company’ form;
 - participates in the valuation of the potential beneficiaries of EIC Fund equity component;
 - makes available detailed information on the potential beneficiaries of the EU funded equity component and their projects for decisions of the EIC Board according to the procedures in place;
 - performs the accountant and paymaster function for the EIC Fund.
4. **Dealflow.eu BV**, Moerstraat 31, 2970 Schilde, Belgium, <https://dealflow.eu/aboutus>
Dealflow.eu:
 - presents the portfolio of selected companies for the EU funded equity to investors for co-investments;
 - analyses available documentation about potential beneficiaries;
 - helps potential beneficiaries improve their pitch-deck and the underlying business case;
 - organises e-pitching activities
 - undertakes additional due diligence complementary to the one of the EIB;
 - helps with data collection and data structuring related to the investment phase.

1.2. The legal basis for the processing based on **Article 5(1)** of Regulation (EU) 2018/1725:

² [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 (OJ L295/39 of 21.11.2018).

³ *EISMEA Establishment Act*: Commission Implementing Decision (EU) [2021/173](#) of 12 February 2021 establishing the **European Innovation Council and SMEs Executive Agency (EISMEA)** (OJ L 50/9 of 15.2.2021).

⁴ [The EIC Fund investment Guidelines are available on the EIC Programme website. They will notably cover in full detail the investment conditions of the EIC Fund.](#)

- (a) the processing is necessary for the **performance of a task carried out in the public interest** by the Agency ⁵ laid down in Union law for the implementation of the applicable EIC work programme⁶ under Horizon Europe⁷;
- (a2) the processing is necessary for the **management and functioning** of the Union Institutions, bodies or agencies (Recital (22) of Regulation (EU) 2018/1725) laid down in Union law;
- (b) the processing is necessary for **compliance with a legal obligation** to which the controller is subject, which are laid down in Union law;
- (c) the 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;
- (d) the data subject has given explicit prior **consent** to the processing of his or her personal data for one or more specific purposes for non-mandatory personal data;
- (e) the processing is necessary in order to protect the **vital interests** of the data subject or of another natural person.

1.3. The purpose(s) of this processing is/are to:

The platform supports EIC applicants for the elaboration of their proposals/business plans with the support of Artificial Intelligence (AI) and the EIC in the organisation of the evaluation/selection of proposals and the contract management processes. This includes:

- Helping applicants to find the appropriate funding scheme for their project idea;
- Supporting the EIC applicants in the elaboration of their business plans using AI to analyse their idea against existing literature and research which does not lead to automated decision-making, as all decisions are made by natural persons;
- Encoding and submission of proposals;
- Evaluation and selection of proposals;
- Matching EIC applicants with business coaches supporting the applicants to prepare their full proposals;
- Organisation of evaluation interviews for EIC applicants ;
- Management of the grants/contracts, including the investment component.

This processing operation supports applicants to find appropriate funding and to submit their proposal to the EIC Accelerator.

The “Submission and Evaluation process” for the EIC Accelerator is managed through the EIC IT platform, using personal data only where necessary which covers the following processes:

- a) The **grant application process** consists of the following steps:
 - **Discovery** (optional step): An *initial exploration phase* to help EIC applicants find the appropriate funding scheme for their project idea;
 - **Step 1 - short proposal**: If the EIC programme is selected as the preferred funding scheme, the applicant is then required to elaborate and submit *a short proposal* including a video and a pitch-deck presenting the team and the idea. This proposal is then assessed remotely by EIC evaluators.
 - The proposal may be shared with relevant Horizon Europe National Contact Points (NCPs) and other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), upon applicants’ consent, in order to further support the applicant with additional services.
 - **Step 2 – full proposal**: Successful applicants of Step 1 will be invited to elaborate *a full proposal* online with the support of an EIC business coach upon request. Step 2 applications will be assessed remotely by EIC evaluators.

⁵ *EISMEA Establishment Act*: Commission Implementing Decision (EU) [2021/173](#) of 12 February 2021 establishing the **European Innovation Council and SMEs Executive Agency (EISMEA)** (OJ L 50/9 of 15.2.2021).

EISMEA Act of Delegation: [Commission Decision C\(2021\)949](#) delegating powers to the **European Innovation Council and SMEs Executive Agency** with a view to the performance of tasks linked to the implementation of Union programmes in the field of Innovative Europe, Single Market and Interregional Innovation Investments comprising, in particular, implementation of appropriations entered in the general budget of the Union.

⁶ Commission Implementing Decision C(2021)1510 of 17 March 2021 on the Financing of the European Innovation Council component of the specific programme implementing Horizon Europe – the Framework Programme for Research and Innovation (2021-2027) and on the adoption of the **work programme for 2021** as well as future EIC workprogrammes to be adopted..

⁷ **Horizon Europe** - the Framework Programme for Research and Innovation (2021-2027), [Regulation \(EU\) 2021/695](#) of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013 (OJ L 170, 12.5.2021, p. 1–68).

- **Interviews:** Successful applicants of Step 2 will be invited to a face-to-face or online interview with an EIC jury as the final step in the selection process. The contact details of the participants to the interviews are also used to inform them of additional EIC services⁸.
- **Negotiation:** Following a successful interview, applicants selected for funding will be invited to negotiate an initial contract for the grant component and eventually start the due diligence process for the EU funded investment component when applicable.
- **Contract signature:** Following a successful negotiation, the applicant is invited to sign a contract with EISMEA.

b) The **selection process of EIC evaluators:**

EIC evaluators are selected from the Horizon Europe experts database (Funding and Tenders Portal⁹) taking into consideration their skills, experience and knowledge and in accordance with the principles of non-discrimination and equal treatment.

c) The **selection process of the EIC business coaches** is as follows:

- The candidate coaches reply to the call for expression of interest for setting up of a list of coaches to provide coaching activities in connection with the EIC¹⁰.
- A list of EIC business coaches who meet the criteria set in the call of expression of interest is established in accordance with the principles of non-discrimination and equal treatment.
- Successful EIC applicants of Step 1 can select their coach to help them elaborate the Step 2 full proposal, from a list of EIC business coaches taking into consideration their skills, experience and knowledge.
- The EISMEA establishes the contracts for the EIC business coaches selected by the EIC applicants.

d) The **selection process of EIC Jury members:**

EIC Jury members are selected from the Horizon Europe experts database (Funding and Tenders Portal), after a pre-selection if needed taking into account also other sources of information (i.e. social media), and considering their skills, experience and knowledge and in accordance with the principles of non-discrimination and equal treatment to set up a list of EIC Jury members.

In case the pitching sessions/Jury interviews are conducted online, European Commission vetted third party video conferencing tools will be used, covered by their specific Data Protection Notice.

- e) **Negotiation module:** In case a proposal is selected for support through an EU funded investment component, the joint controllers may find a suitable Investment Partner to manage the EIC Investment component, and share necessary information, including personal data, with these Investment Partners, based on explicit prior consent.
- f) **Helpdesk and support to end-users:** The joint controllers uses third party online tools (such as zoho.eu) to collect, manage and respond to questions submitted by users providing support to key and recurrent questions and issues.
- g) The **EIC IT Platform** may also be used for the management of the grants/contracts, including the investment component.

Further information on other funding opportunities or additional services may be provided by relevant Horizon Europe National Contact Points (NCPs), other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), Enterprise Europe Network partners or Knowledge Innovation Communities of the European Institute of Innovation and Technologies (EIT KICs), based on your explicit prior consent.

1.4. The categories of data subjects concerned by this processing from whom personal data are collected:

- EIC applicants, including CEOs and relevant team members;
- EIC evaluators (Horizon Europe experts);
- EIC jury members (Horizon Europe experts);
- EIC Business Coaches (Horizon Europe experts);
- Competent staff of Horizon Europe National Contact Points¹¹ (NCPs) and other relevant public organisations from EU Member States (including regional innovation organisations, European

⁸ https://eic.ec.europa.eu/eic-funding-opportunities/business-acceleration-services_en.

⁹ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/work-as-an-expert>.

¹⁰ https://eic.ec.europa.eu/eic-funding-opportunities/business-acceleration-services/coaching-under-eic_en.

¹¹ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/ncp>.

Structural and Investment Funds¹² (ESIF) Managing authorities etc), Enterprise Europe Network partners or Knowledge Innovation Communities of the European Institute of Innovation and Technologies (EIT KICs);

- Authorised staff of EU Institutions in charge of implementing the Horizon Europe / EIC programme;
- Authorised staff of the European Investment Bank (EIB);
- Authorised staff of the EIC Fund in charge of implementing the EIC investment component and authorised staff of their subcontractors.

1.5. The following personal data are collected:

For the **EIC application**: first name, last name, gender, e-mail address, phone number, address and country of residence, nationality as well as CV, competences, experiences, expertise by means of questionnaires.

All users of the EIC IT tools and services are required to sign up for 'EU login' credentials. The 'EU login' service has its own privacy statement.

EIC platform stores the 'EU login' credentials: login and e-mail addresses such as retrieved from 'EU login' and the European Commission's Central User Database which is stored at the Data Centre of the European Commission subject to Regulation (EU) No 2018/1725.

Data collected through the EIC IT tools are mandatory for the purpose(s) outlined above, unless indicated otherwise in the application/submission forms.

In addition, for the **evaluation jury interviews**, the following data are collected: date of birth, Passport/ID number, organisation and function in the organisation, professional e-mail address, phone number, the registration number in the participant portal, contract of employment, most recent salary slip, company registration act and/or its statutes. These personal data are mandatory to verify the legal and contractual link between the applicant company invited to the jury interview and its representative attending the jury interview; as well as to permit access to the European Commission/Agency buildings where the interviews are taking place in case of physical meetings.

Some **non-mandatory** personal data may be collected such as photo, social media accounts (i.e. LinkedIn/Twitter) which can only be processed based on explicit prior consent.

Additional personal data from other EU or public databases may be used for the process of the Submission and Selection of applications to the EIC Accelerator.

Site activity logging (Log files):

EIC IT platform stores the following information on its server:

The firewall keeps track of the network traffic, information like user's IP address are recorded;

The standard log facility on the Internet Information Server (web server) is on, and collects the usual information including browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages and other relevant information enabling EISMEA to improve the user experience and identify attempts of inappropriate use of the EIC IT platform.

The EIC IT platform logging capabilities are complemented by the dedicated analytics tool [Matomo](#).

The purpose of the information is for analysing trends, administering the site, tracking users' movement on the website, and gathering geographical information.

In the context of auditing of the EIC IT platform, personally identifiable information might be collected to ensure the security and the integrity of the system and prevent any inappropriate use of the platform.

1. Cookies

EIC IT platform uses 'cookies' necessary to store information such as visitors' preferences and website pages accessed. This information is used to optimise the users' experience.

2. What are cookies?

A cookie is a small text file that a website saves on computer or mobile device of visits on the site. It enables the website to remember actions and preferences (such as login, language, and font size and other display preferences) over a period of time, so the user doesn't have to keep re-entering them whenever coming back to the site or browse from one page to another.

3. How do we use cookies?

A number of our pages use cookies to store display preferences, such as contrast colour settings or font size and non-identifiable data such as browsing behaviour within a session to improve the service.

Enabling these cookies is not strictly necessary for the website to work but it will provide users with a better browsing experience. These cookies can be deleted or blocked, but if some features of this site may not work as intended.

¹² https://ec.europa.eu/regional_policy/en/atlas/managing-authorities.

4. How to control cookies

Cookies can be **controlled and/or deleted** by users – for details, see aboutcookies.org, all cookies that are already on computer can be deleted and most browsers can be set to prevent them from being installed. Please note that in such a case some services and functionalities may not work as designed.

The system uses session cookies in order to ensure communication between the browser and the server. Therefore, the browser should be configured to accept cookies and they are discarded once the browser session is terminated.

1.6. The recipients to whom the personal data will or might be disclosed are:

- Authorised staff of the EU Institutions in charge of the implementation of the Horizon Europe / EIC programme;
- Authorised staff of the EIC Fund and its subcontractors supporting key processes and data collection (i.e. The Innovation Loop SAS, EIB, Alter Domus Luxembourg S.à r.l., Dealflow.eu BV);
- Security personnel of EU Institutions, in case of physical meetings;
- Authorised Staff of EISMEA or Commission's contractors¹³ responsible for providing the IT solution for the submission and evaluation process of the EIC programme.
- EIC experts such as EIC evaluators, jury members and coaches;
- Bodies charged with monitoring inspection or enforcement tasks in application of EU or national law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF), European Ombudsman and the Courts of the European Union, national courts, law enforcement bodies).

A limited set of personal data of the EIC applicants may also be shared with relevant **Horizon Europe National Contact Points** (NCPs), other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), **Enterprise Europe Network partners** or **Knowledge Innovation Communities of the European Institute of Innovation and Technologies** (EIT KICs), for further information on other funding opportunities or additional services, based on your explicit consent.

In case a proposal is selected for support through an EU funded investment component, the EIC may find a suitable **Investment Partner** to manage the EIC Investment component and may share necessary information, including personal data, with these Investment Partners, based on explicit prior consent.

The European Union Institutions and the EIC Fund will not share personal data with other third parties unless allowed by law or necessary for the provision of the above-mentioned services based on explicit prior consent.

1.7. Personal data **will not be transferred to third countries** or **international organisations** unless based on explicit prior consent (e.g. to authorise access of NCP established in third countries or use of third party tools).

1.8. EIC is using Artificial Intelligence (AI) to facilitate the processing of data submitted. The use of AI however does **not lead to automated decision-making**, as **all decisions are made by natural persons**.

1.9 The following technical and organisational security measures are in place to safeguard the processing of this personal 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 Agency or of its contractors.

All processing activities 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.

The Agency's or Commission's contractors are bound by specific contractual clauses and confidentiality clauses for processing of personal data on behalf of the joint controllers, and subject to obligations deriving from Regulation (EU) 2018/1725 and the General Data Protection Regulation ('GDPR' Regulation (EU) 2016/679).

In order to protect personal data, the joint Controllers have put in place a number of technical and organisational measures. This includes 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. In addition, access to the personal data are restricted solely to authorised persons with a legitimate need to know for the purposes of each processing operation.

¹³ All contractors working for the European Institutions and the EIC Fund have signed non-disclosure agreements.

Access to the EIC IT platform is secured, via the EU Login authentication service and role-based authorisation mechanisms.

All stakeholders involved in the evaluation, selection and contracting process are bound by their contractual arrangements to use the personal 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.

1.10 The personal data concerned **will be kept for the maximum periods** set out below, at the end of which the data will be deleted.

Personal information is kept only as long as necessary for the purposes for which it was collected or to comply with the legal obligations, including reporting or statistical purposes.

- The personal data of selected EIC experts such as **Business Coaches, Evaluators or Jury members** will be kept for **7 years** after the end of the relevant programme.
- For **not yet selected EIC expert or coach**, personal data is kept for the duration of the EIC programme.
- In case EIC applicants are **invited to a Jury Interview**, the date of birth, Passport/ID number, contract of employment, most recent salary slip specifically submitted for the interview will only be kept for maximum 6 months from the last day of the week in which the interview took place. Data will be automatically deleted at the end of this period.
- For **funded EIC applicants** personal data are retained for **10 years** after the end of the year following closure of the Horizon Europe / EIC programme.

Pursuant to Article 4(1)(e) of the Regulation 2018/1725, 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, unless the right to object under Article 23 of the Regulation is exercised;

- In case an **application is not successful or withdrawn**, personal data are retained for up to **5 years** after the closure of the evaluation process for which the data have been collected or updated. We may retain limited categories of personal data of unsuccessful applicants for scientific research and/or statistical purposes for up to 25 years, unless the right to object under Article 23 of the Regulation is exercised.

1.11 Data Subjects are informed on the processing of their personal data via a **data protection notice on their rights** :

- to access their personal data held by a controller;
 - to request their personal data held by a controller to be corrected;
 - to obtain in some situations erasure of their personal data held by a controller, e.g. when data are held unlawfully (right to be forgotten);
 - to withdraw consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;
 - to object to processing on grounds relating to his or her particular situation, unless the controller demonstrates compelling legitimate overriding grounds;
 - **of recourse** at any time to the **EISMEA Data Protection Officer** at EISMEA-DPO@ec.europa.eu and to the **European Data Protection Supervisor** at <https://edps.europa.eu>.
- Request** from a data subject to exercise a right will be dealt within **one month**.

The right to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the **applicable Restriction Decision** in accordance with Article 25 of Regulation (EU) 2018/1725.

Any queries concerning the processing of personal data, have to be addressed to the Data Controller indicated above in 1.1. at EISMEA-SME-HELPDESK@ec.europa.eu, including the request to access, check, modify, update or delete data or the account.
