

## **THE RESEARCH PROMOTION FOUNDATION'S PERSONAL DATA PROTECTION POLICY**

### **1. General**

1.1 The Research Promotion Foundation (RPF) has the legal obligation when collecting, processing and using personal data to do so in accordance with the provisions of the Regulation (EU) 2016/679 "General Data Protection Regulation (GDPR)" as the Data. To this end, the present Policy determines the way in which the RPF collects and processes personal data (information) relating to natural persons (individuals), as well as the way in which it obtains their consent in relation to the processing of their data.

The purpose of this Policy is to provide adequate and consistent safeguards for the management of personal data (as defined below) which in accordance with the principles and provisions of Regulation (EU) 2016/679 "General Data Protection Regulation (GDPR)" entered into force on 25 May 2018.

1.2 Personal data is: any information relating to an identified or identifiable natural person ("data subject") an identifiable natural person being one whose identity can be identified, directly or indirectly, in particular by reference to a recognisable element of identity, such as a name, identity number, location data, online identity card, or one or more factors specific to the physical, physiological, genetic, psychological, economic, cultural or social identity of that natural person.

1.3 Processing of personal data is interpreted to mean any work or set of operations performed by any person with or without the use of automated methods and which applies to personal data and includes the collection, registration, organization, maintenance, storage, amendment, removal, use, transfer, transmission or any other means of distribution, matching or association, connection, locking, deletion or destruction.

### **2. Personal Data**

The RPF adopts an electronic data storage system that covers the submission and evaluation of research proposals, monitoring of research projects, archiving of documents and the managing of client relations. Therefore, the collection of personal data will, mainly be achieved through the electronic system, except in cases where it is submitted by hand, by post or by e-mail.

2.1 The categories of personal data that the RPF can collect and process are the following:

- name, surname, age, gender,
- contact details, including address, number, telephone, e-mail and fax,
- identity card and passport information, or information relating other forms of identification,
- information recorded in Time Sheets,
- information contained in pay slips, and / or payroll extracts, Social Insurance slips, Statement of Social Insurance and Payments, Form I.R.7 (employer's tax return),

- boarding passes, place of residence, ticket stubs related to researchers' travels for RPF activities,
- information contained in Curriculum Vitae or other information related to education, previous employment, years of experience, research interests or other qualifications.

2.2 The RPF has the right to collect and process personal data in relation to a natural person solely for the purposes listed below. The collection and processing of personal data may be done at any time during the procedures listed below:

- the legal status check of entities for their classification in the categories of beneficiaries as defined in each of the Calls for Proposals / Work Programs of the RPF.
- the submission, evaluation of a research proposal and / or applications for support measures and / or participation in competitions and preparation of research contracts and / or contracts for the financing of other activities,
- monitoring the implementation and financing of research projects or other funding measures,
- promoting participation in research programs and other support and / or funding measures, and / or in competitions,
- communication to provide targeted information, such as information (a) in relation to research collaborations and research proposals; (b) business partnerships aimed at the transfer of technology and expertise; (c) participation in informative events on information technology and technological development.
- statistical analysis of data and preparation of reports to competent national bodies,
- assessment of the effectiveness of RPF programs and procedures. For these purposes, external experts may communicate with people participating in RPF-funded programs / measures.

2.3 Personal data may be provided indirectly to the RPF by third parties, in accordance with the Law, for the purposes mentioned in the above paragraph, for example where a person participates in a research project and the data is submitted through the Host Organisation and the Project Coordinator.

### **3. Purpose of Processing**

3.1 The RPF has the right to maintain records, as well as to collect, process and use personal data only for the following purposes:

- providing information on research and innovation of business partnerships. The provision of information is subject to the explicit consent of the data subject through a specific, separate form. The retention of such data lasts for as long as such data is necessary for the fulfillment of these objectives and subject to the express consent of the subject.

- legal status check of entities and their classification in the categories of beneficiaries, as defined in the Call of Proposals / Work Programs of the RPF. . The period of retention of such data is set in accordance with applicable State aid regulations or/and other relevant regulations related to each respective funding framework. The RPF may retain personal data for statistical purposes, in accordance with the relevant paragraph below.
- evaluation of a research proposal or an application for support / financing and contract preparation. The retention period of the data is up to five (5) years from the date of submission. The RPF may retain personal data for statistical purposes, in accordance with the relevant paragraph below.
- monitoring of research projects funded by the RPF and controlling eligibility for funding. The retention period of such data is up to ten (10) years, from the date that the aid is granted for purposes of compliance with the applicable state aid regulatory framework.
- statistical purposes. Data is retained for statistical purposes both for non-funded research proposals as well as for proposals that are approved and funded (research projects) for as long as it is deemed necessary. Processing will be subject to appropriate safeguards, regarding the rights and freedoms of the data subject. These measures include pseudonomisation and other encryption methods. When such processing becomes redundant for these purposes, personal data will be deleted.
- assessment of the effectiveness of RPF programs and procedures. For these purposes, external experts may communicate with people participating in RPF-funded programs / measures. Such personal data is retained for as long as such processing is necessary. Processing will be subject to appropriate safeguards regarding the rights and freedoms of the data subject. Such measures will include the use of pseudonomisation and other authorized encryption methods.

3.2 It is clarified that the RPF processes personal data for statistical purposes and for the preparation of relevant reports in relation to research and the research web in Cyprus and if it is deemed necessary, it makes such data available, for purposes of statistical analysis, to specialized external experts acting as sub-contractors of the RPF, for the purpose of conducting a statistical analysis. Subcontractors, based on an agreement with the RPF, process only personal data on documented instructions from the RPF and are required to proceed with such processing by taking appropriate security measures.

3.3 The RPF may also process data for information purposes in relation to research projects of the RPF or the EU, support or funding measures. Processing for such information purposes is done following the explicit consent of the data subject, which is given to the RPF via a special document for this purpose.

#### **4. Confidentiality and Disclosure of Personal Data**

All personal data will be collected and processed with absolute confidentiality by the RPF employees. It is noted that in cases where issues of participation in programs and / or support / financing measures fall within the competence of the RPF Board of Directors to inform and to make a final decision, personal data may be forwarded to the Members of the Board of Directors

or to external experts supporting the work of the Board of Directors, who are bound to abide by the principle of confidentiality.

Unless permitted by law or ordered by court, personal data will only be disclosed to third parties (recipients of data) referred to in this Regulation. Very limited and basic information on funding or other RPF activities will be published on the RPF website ([www.research.org.cy](http://www.research.org.cy)), for transparency purposes. The information published on the website may relate to elements of funded projects such as: protocol number, title, project summary, Project Coordinator's name, Partner's name and / or Personnel, Project Budget and RPF funding.

Furthermore, the RPF presents, when requested, data concerning the implementation of research projects or financing measures to the Managing Authority (Directorate-General for European Programmes, Coordination and Development), the Certification Authority (Treasury of the Republic of Cyprus), the Audit Authority (Internal Audit Service), the Monitoring Committee of the Operational Program.

It also presents, when requested, data relating to the implementation of research projects or financing measures to all relevant audit bodies of Cyprus (Audit Office of the Republic of Cyprus) or the European Union (where applicable) or their authorized representatives or external experts who provide services to the RPF for the purposes of the financial audit of the projects and paying for the funding. Part of the registry dealing with projects co-funded by the European Structural and Investment Funds (ESIF) is electronically linked to the Managing Authority's archive of ESIF (Directorate-General for European Programmes, Coordination and Development).

Furthermore, personal data will be given to European Organizations, as instructed by the individuals involved, as well as to external evaluators for the scientific evaluation of proposals or projects from countries that are members of the European Union, the European Economic Area (Iceland, Norway, Liechtenstein) from Israel and Switzerland.

The archive of the RPF is located at its offices (123 Strovolos Avenue, 2042, Nicosia) and at the premises of a private record company (Fileminders Ltd).

The information registered in the RPF's electronic system will be kept in the servers of the COSMOS & ALL WEB companies, which have undertaken the development and maintenance of the electronic system on behalf of the RPF.

Fileminders Ltd and COSMOS & ALL WEB take all necessary technical and organizational measures and act as processors. They process personal data only under written instructions and directions from the RPF as Data Controller.

## **5. Security**

The RPF is committed to preserving the integrity of personal data and to deter unauthorized access to such data stored in its databases. Priority is the prevention of data corruption and the prevention of unauthorized access to RPF systems. Software security controls are used to protect personal data from loss, misuse and unauthorized access, destruction, and any other breach.

## **6. Rights of Natural Persons**

Persons have the right to check and access their personal data for deletion, or correction of personal data that is inaccurate. Individuals have the right to object, under legitimate reasons, to the processing of their personal data in accordance with the procedures specified in the relevant Regulation (EU) 2016/679 - General Data Protection Regulation. Data subjects have the right to portability, i.e to receive their personal data in a structured, commonly used and machine-readable format. Individuals may modify their personal data either through the RPF's electronic system (<https://iris.research.org.cy>) or through a request to be sent to 123 Strovolos Avenue, 2042 Nicosia, P.O. 23422 1683 Nicosia.

## **7. Policy Amendment**

The RPF reserves its right to amend the present Policy from time to time. Any such modifications will be published on the Foundation's website ([www.research.org.cy](http://www.research.org.cy)) and on the RPF's electronic system (<https://iris.research.org.cy>).

## **8. For your Information**

In case where individuals' personal data are provided to the RPF through a third party (for example through the Host Organisation and / or the Project Coordinator who assumes a managing and coordinating role for the purposes of the research project), then such third parties undertake the responsibility to provide a confirmation to the RPF that they have informed the data subjects of the content of this Regulation and the possibility of disclosing such data to the RPF. It is implied that, in case of failure to sign the present document, the RPF reserves the right to refuse to receive any personal data on behalf of the Host Organisation and / or the Project Coordinator or to examine any of their applications / proposals.

This Policy is posted on the RPF's website ([www.research.org.cy](http://www.research.org.cy)) and the RPF's electronic system (<https://iris.research.org.cy>).