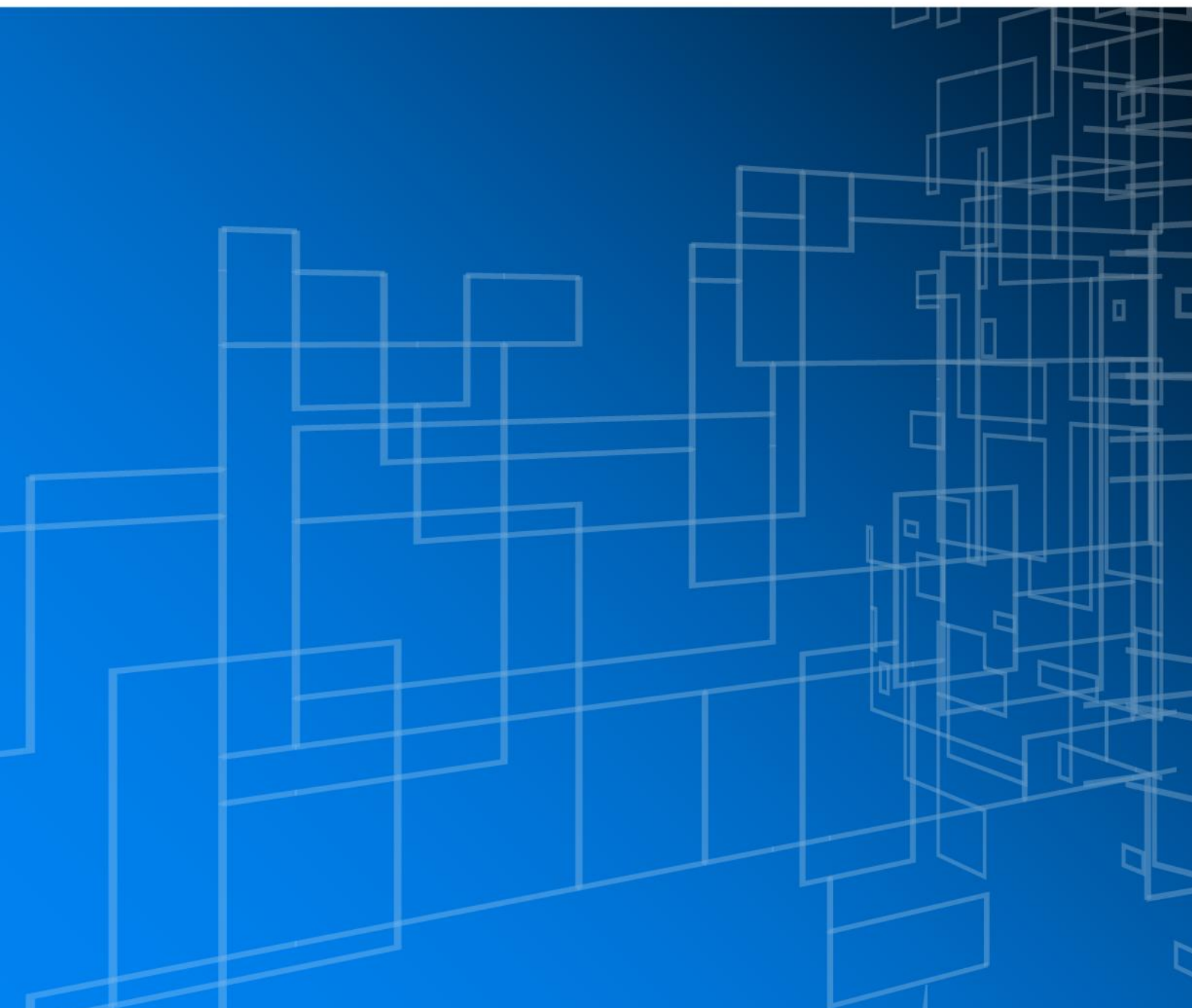


DATA PROTECTION

Call for Exploratory Research Projects in all Scientific Domains 2024

DECEMBER 2024



Data Protection

In the context of the **Call for Exploratory Research Projects in all Scientific Domains 2024**, hereinafter referred to as **PEX2024**, personal data is collected and processed in accordance with the General Data Protection Regulation (GDPR), approved by Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016, concerning the protection of natural persons with regard to the processing of personal data and the free movement of such data, effective as of 25 May 2018, and in compliance with Law No. 58/2019, of 8 August, which ensures the implementation of the GDPR in the national legal framework.

Data Controller

The *Fundação para a Ciência e Tecnologia, I.P.*, hereinafter FCT, assumes the role of data controller, with its registered office at Av. D. Carlos I, 126, 1249-074 Lisbon, telephone: +351 21 3924300.

Data Protection Officer

FCT has appointed a Data Protection Officer, who can be contacted directly via email at dpo@fct.pt for all matters related to the processing of personal data carried out by FCT.

Purpose and Legal Basis for Processing

Personal data is collected exclusively for the purpose of Managing Funding and Co-funding Instruments, and its processing is lawful as it is necessary:

- **For the performance of a contract** to which the data subject is a party, or to **carry out pre-contractual measures** at the request of the data subject, under Article 6(1)(b) of the GDPR;
- **To comply with legal obligations**, under Article 6(1)(c) of the GDPR, as specified in points (a) and (c) of Article 3(2) of FCT's Organic Law, approved by Decree-Law 55/2013, of 17 April;
- **For the performance of a task carried out in the public interest by FCT**, under Article 6(1)(e) of the GDPR, based on Regulation No. 999/2016, in its current wording, *i.e.*, amended and republished by Regulation no. 5/2024 and corrected by the Declaration of Rectification no. 366/2024/2, published in the *Diário da República*, 2nd series, no. 100, of May 23, 2024, which establishes the conditions for access and support rules for projects funded exclusively by national funds through FCT.

FCT may also process personal data for **purposes of public interest archiving, scientific or historical research, or statistical purposes**, respecting the principle of data minimization, including anonymization or pseudonymization of the data, whenever these means can achieve the intended purposes.

Collection of Personal Data

Within the scope of PEX2024, personal data is collected in two phases:

1. **During Application:** Data necessary to validate the eligibility and merit of the application is collected.
2. **During the Funding Phase:** Additional data, mainly financial and related to project execution and accountability, is collected.

In the different stages of the call, the personal data collected is categorized as follows:

- **Application Phase:** During the PEX2024 application process, common and special categories of personal data are collected. These are provided directly by the principal investigator through a specific form and submission via the myFCT platform.
- **Funding and Contract Management Phase:** After the application is approved, additional personal data is collected during the contracting and funding management process. This may include financial information and sensitive data (e.g., disability degree) related to project execution.

Within the scope of PEX2024, personal data is collected:

- a) **Directly from the data subjects**, who provide it through application forms and online platforms made available, specifically, the myFCT platform, where the entire application, evaluation, and funding approval process is submitted in a single system; the CIÊNCIA ID Platform, which houses the national identifier for accessing various science services; the CIÊNCIAVITAE platform, containing the CVs of all team members associated with the research team; and the Science and Technology Portal (PCT), where data of entities responsible for applications is collected, and communication with FCT's interlocutors (individual and collective) takes place, aiming to significantly improve procedural efficiency.
- b) **Indirectly from the data subjects**, through beneficiary entities providing personal data related to applications or cases where principal investigators provide data on team members.

Description of Data Subjects and Categories of Personal Data

Personal data processed under PEX2024 call includes the following:

a) Categories of Data Subjects:

Researchers, academics, students, PhD holders, among other beneficiaries involved in the Portuguese scientific system, particularly those in higher education institutions, their research units, State Laboratories, Associated or International Laboratories based in Portugal, non-profit private institutions focused on R&D activities (including Collaborative Laboratories and Technology and Innovation Centres), representatives of other public and private institutions engaged in scientific research activities, representatives of companies involved in SR&TD projects led by non-business entities in the R&I system, representatives of foreign institutions as project partners, participants of collaborating institutions, principal investigators, co-principal investigators, research team members,

coordinators, reviewers (independent experts and external reviewers, national or international, affiliated with national or international institutions).

b) Categories of Personal Data:

Common:

- Civil Identification: Full name, surname, date of birth, gender, civil identification and/or passport number, and taxpayer number;
- Contact Information: Institutional email address, city, and country or region of residence;
- Academic and Professional Activity: Professional status, educational background, academic or professional trajectory, academic degree, job titles, scientific identification, and project identification;
- Physical Data: Image in paper or video format, if applicable;
- Financial Information: Including IBAN.

Special:

- Criminal Records: Penal convictions and offenses, if applicable;
- Health Information: Details in documents necessary to justify eligibility during the project period.

For the services associated with the myFCT, CIÊNCIA ID, CIÊNCIAVITAE, and PCT platforms, various categories of personal data may also be collected concerning different data subjects for different processing purposes as defined by the Privacy Policies applicable to each platform.

Sharing Personal Data with Third Parties

In the context of fulfilling legal obligations related to the purpose of Managing Financing and Co-financing Instruments, the data is disclosed to the Ministry of Education, Science and Innovation for the necessary acts of approval, without excluding other entities not mentioned but legally authorized to request, collect, and process the data in question.

Processors

Personal data may be transmitted to processors who process it on behalf of FCT. In such cases, FCT ensures contractual measures are in place to guarantee that subcontractors respect and protect the subject's personal data.

These entities must provide written guarantees of adequate technical and organizational measures in compliance with applicable privacy and data protection laws, formalized through a contract signed between FCT and each third-party entity.

Data Transfer to Third Countries

For personal data processing within the scope and purpose indicated, personal data may be transferred internationally to both European Economic Area countries and third countries. In such cases, FCT formalizes these international data transfers only with entities offering adequate

guarantees of technical and organizational measures to comply with applicable privacy and data protection laws and ensure the protection of data subjects' rights.

Retention Period

The retention period for personal data is set by legal or regulatory norms or, in their absence, as necessary to achieve the purpose for which the data was collected and processed.

Data is retained in a manner that allows the identification of data subjects only as long as necessary for the purpose for which it is processed, subject to compliance with legal obligations requiring a specific retention period or the exercise of FCT's legitimate rights and interests.

For archiving in the public interest, scientific or historical research, or statistical purposes, FCT may retain some data for longer periods while applying appropriate safeguards for the rights and freedoms of data subjects, as per the applicable legislation. These safeguards involve adopting technical and organizational measures to ensure data minimization and pseudonymization.

Rights of Data Subjects

Using any of the contacts above, and within the legal limits, data subjects have the right to request access to their personal data, rectification or erasure, restriction of processing, and data portability when technically feasible. They may also object to processing or withdraw consent at any time if applicable.

Notification and Complaint

In addition to notifying FCT through the available contacts at <https://www.fct.pt/contactos>, data subjects may file a complaint directly with the National Data Protection Commission (www.cnpd.pt) using the contacts provided by this entity.

General Measures Adopted to Ensure Personal Data Security

To ensure personal data protection, FCT implements strict, internationally recognized rules that apply to all individuals handling personal data lawfully.

Accordingly, technical and organizational security measures are in place to protect the personal data provided to FCT, as well as the confidentiality, integrity, and authenticity of processed data. Personal data stored by FCT is encrypted and anonymized whenever possible, subject to access control based on the principle of least privilege.

In this context, processes involving the publication of approved and non-approved application lists and reviewers panel lists are structured to ensure that data is findable, accessible, interoperable, and reusable by default.

Additionally, FCT continuously reviews information security standards to ensure not only continuous improvement but also to stay updated on new threats, implementing necessary countermeasures.

