



Call for R&D Projects in All Scientific Domains 2025

Data Protection

November 2025



Protection of Personal Data and Privacy

In the context of the **Call R&D Projects in All Scientific Domains 2025 - PTDC2025**, personal data are collected and processed in accordance with the General Data Protection Regulation (GDPR), approved by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, in force since 25 May 2018, and pursuant to Law No. 58/2019 of 8 August, which ensures the implementation of the GDPR in the national legal order.

Data Controller

The Fundação para a Ciência e Tecnologia, I.P., hereinafter FCT, acts as the Data Controller, headquartered at Av. D. Carlos I, 126, 1249-074 Lisbon, telephone: +351 21 3924300.

Data Protection Officer

FCT has appointed a Data Protection Officer, who may be contacted directly via the email 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 are collected exclusively for the purpose of Managing Funding and Co-funding Instruments, and their processing is lawful as it is necessary:

- For the performance of a contract to which the data subject is a party, or for pre-contractual procedures at the request of the data subject, under Article 6(1)(b) of the GDPR.
- For compliance with legal obligations, under Article 6(1)(c) of the GDPR, as set out in points a) and c) of paragraph 2 of Article 3 of FCT's Statutes, approved by Decree-Law 55/2013 of 17 April.
- For the performance of tasks carried out in the public interest by FCT, under Article 6(1)(e) of the GDPR and based on Regulation 5/2024 of 3 January, which establishes the access conditions and support rules for projects financed exclusively by national funds through FCT.

FCT may also process personal data for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, respecting the principle of data minimisation, including anonymisation or pseudonymisation whenever the intended purposes can be achieved through these means.

Collection of Personal Data

Within PTDC2025, personal data are collected in two phases:

During the Application: Data necessary to validate the eligibility and merit of the application are collected.

During the Funding Phase: Additional data—mainly financial—and data related to project execution and reporting are collected.

At different stages of the call, the personal data collected fall into the following categories:

Application Phase: During the application process for projects under PTDC2025, both common and special categories of personal data are collected. These personal data are provided directly by the Principal Investigator through a specific form and submission of the application via the myFCT platform.

Funding and Contract Management Phase: After the approval of the application, during the contracting and funding management process, additional personal data are collected, necessary to formalize contracts and support project follow-up. These may include financial information and sensitive information (e.g., degree of disability) related to project execution.

Within PTDC2025, personal data may be collected:

- a) Directly from data subjects, who provide them through application forms and online platforms, specifically the MyFCT Platform, where the entire application, evaluation and funding approval process is submitted within a single system; the CIÊNCIA ID Platform, where the national identifier for accessing scientific services is hosted; the CIÊNCIAVITAE Platform, where the CVs of all team members are stored; and the Science and Technology Portal (PCT), where data from the entities responsible for applications are collected and communication with FCT's individual and collective interlocutors occurs, aiming to significantly improve procedural efficiency. Additionally, in the case of evaluations, data may also be collected through the recruitment and designation processes of evaluators.
- b) Indirectly from data subjects, through beneficiary entities that provide personal data related to applications, or in cases where Principal Investigators provide personal data of team members.

Description of Categories of Data Subjects and Categories of Personal Data

The personal data processed relate, in particular, to:

a) Categories of data subjects:

Researchers, teachers, students, PhDs and other beneficiaries involved in the Portuguese scientific system, including higher education institutions, their institutes and R&D units, State Laboratories, Associated Laboratories or international laboratories headquartered in

Portugal, private non-profit institutions whose main objective is R&D activities—including Collaborative Laboratories (CoLab) and Technology and Innovation Centers (CTI), representatives of other public or private non-profit institutions engaged in scientific research activities, representatives of companies of any nature and legal form, provided they are part of IC&DT projects led by non-business entities in the R&I system, representatives of foreign partner institutions, representatives of participating institutions associated with the PIs, representatives of collaborating institutions, Principal Investigators, co-Principal Investigators, research team members, coordinators, evaluators (independent experts and external evaluators, national or foreign, affiliated to national or foreign institutions).

b) Categories of personal data:

Common:

- Civil identification: including full name, surname, date of birth, gender, identification number and/or passport number, and taxpayer number;
- Contact information: including institutional email address, city and country or region of residence;
- Academic and Professional Activity: detailing employment status, qualification level, academic or professional background, academic degree, titles, scientific identifiers, and project identifiers;
- Physical data: including image in print or video, if applicable;
- Financial information: including IBAN.

Special:

- Criminal record: convictions and offences, if applicable;
- Health information: including details in documents required to justify the eligibility condition at the time of the project.

For the provision of services associated with the MyFCT, CIÊNCIA ID, CIÊNCIAVITAE and PCT Platforms, additional categories of personal data relating to different categories of data subjects may also be collected for different processing purposes, as defined in the respective Privacy Policies.

Sharing of Personal Data with Third Parties

In compliance with legal obligations related to the purpose of Managing Funding and Co-funding Instruments, data are disclosed to the Ministry of Education, Science and Innovation for homologation procedures. Other entities with legal legitimacy to request, collect and process the data may also access them.

Processors

Personal data may be transmitted to processors so that they may process them on behalf of FCT. In such cases, FCT will take the necessary contractual measures to ensure that the processors respect and protect the personal data.

Entities processing personal data on behalf of FCT must provide written guarantees of implementing appropriate technical and organisational measures to comply with applicable privacy and data protection legislation and ensure the safeguarding of data subjects' rights. These guarantees must be formalized in a contract signed between FCT and each processor.

Transfer of Data to Third Countries

For the purposes described, personal data may be subject to international transfers not only to countries within the European Economic Area but also to third countries. In such cases, FCT will formalize international data transfer agreements only with entities that provide sufficient guarantees of implementing appropriate technical and organisational measures to comply with applicable data protection legislation and ensure the safeguarding of data subjects' rights.

Retention Period

The retention period for personal data is that which is established by legal or regulatory provisions or, in their absence, the period necessary for the purposes for which the data were collected and processed.

Personal data are kept in a form that allows identification of data subjects only for the period necessary for the purposes for which they are processed, without prejudice to legal obligations requiring specific retention periods or to the exercise of legitimate rights and interests of FCT.

For processing carried out for archiving in the public interest, scientific or historical research purposes, or statistical purposes, FCT may retain some data for longer periods, while applying appropriate safeguards for the rights and freedoms of data subjects, in accordance with applicable legislation.

These safeguards involve implementing technical and organisational measures to ensure compliance with the principles of data minimisation and pseudonymisation.

Rights of Data Subjects

Through any of the contacts indicated above, and without prejudice to the legal limits, data subjects have the right to request from FCT access to personal data concerning them, their rectification or erasure, restriction of processing, and data portability when technically possible. They may also object to processing or withdraw consent at any time, if consent was the legal basis for processing.

To learn more about how FCT uses and protects your personal data, please consult the "General Privacy and Data Protection Policy", available at: <https://www.fct.pt/politica-de-privacidade-e-protecao-de-dados/>.

Notification and Complaint

Without prejudice to direct notification to FCT through the contacts available at <https://www.fct.pt/contactos>, data subjects may lodge a complaint directly with the Portuguese Data Protection Authority (www.cnpd.pt) using the contacts provided by that entity.

General Measures Adopted to Ensure the Security of Personal Data

To ensure the protection of personal data, FCT implements strict and internationally recognised rules applicable to all those who legally handle personal data.

Accordingly, technical and organisational security measures are implemented to protect the personal data provided to FCT, as well as the confidentiality, integrity and authenticity of the processed data. Whenever possible, personal data stored by FCT are encrypted and anonymised and subject to access control based on the principle of least privilege.

In this context, and in line with the obligations to publish lists of approved and non-approved applications and evaluator panel lists, the data are ensured to be findable, accessible, interoperable and reusable by default.

Furthermore, FCT continuously reviews information security standards not only to ensure continuous improvement but also to remain up to date regarding new threats, implementing necessary countermeasures.

