POLARIN GDPR Compliance Policy

1. Introduction

The POLARIN project, funded by the European Union, is committed to ensuring the protection of personal data in compliance with the General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679). This policy outlines how personal data will be collected, used, stored, and processed during the evaluation of applications submitted to POLARIN calls for proposals.

2. Data Controller

The POLARIN project consortium is the data controller is bound by the Joint controller Agreement according to Art. 26 GDPR Any questions regarding data protection or GDPR compliance can be addressed to the Data Protection Officer (DPO) at the respective partner (a list of all partner of POLARIN) can be found at https://eu-polarin.eu/partners/

3. Data Collection Purpose

POLARIN will collect personal data to assess, evaluate, and manage applications submitted to its calls for proposals. This data is necessary to ensure proper evaluation, selection, and communication with applicants.

4. Types of Personal Data Collected

The following types of personal data may be collected from applicants:
- Full name
- Nationality
- Gender
- Contact details (email, phone number, address)
- Affiliation and job position
- CVs and professional background information
- Any additional data provided by the applicants in their submissions

5. Legal Basis for Processing

Personal data will be processed based on the following legal grounds:
- **Consent**: Applicants provide explicit consent when submitting their applications, agreeing to the collection and processing of their personal data.
- **Contractual Necessity**: Data is processed to evaluate the application and determine the applicant's eligibility for the project.
- **Legal Obligations**: POLARIN may also be required to process data to comply with EU laws and regulations.

6. Data Retention

Personal data will be retained for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal, reporting, and auditing requirements. Once the

evaluation process and any subsequent activities are completed, the data will either be anonymized or securely deleted.

7. Data Sharing

Personal data will only be shared with:
- Evaluation panel members and reviewers involved in the application process.
- Research infrastructure operators
- Relevant authorities and funding bodies, as required by EU regulations.

POLARIN will not sell, rent, or otherwise disclose personal data to unauthorized third parties.

8. Data Security

Appropriate technical and organizational measures will be in place to protect personal data from unauthorized access, alteration, or loss. These measures include encryption, access controls, and regular security audits.

9. Data Subject Rights

Under GDPR, individuals whose personal data is processed by POLARIN have the following rights:
- **Right of Access**: Individuals can request access to their personal data.
- **Right to Rectification**: Individuals can request corrections to inaccurate or incomplete data.
- **Right to Erasure**: Individuals can request the deletion of their personal data when it is no longer necessary for the purposes collected.
- **Right to Restrict Processing**: Individuals can request limitations on how their data is processed.
- **Right to Data Portability**: Individuals can request that their data be provided in a structured, commonly used, and machine-readable format.
- **Right to Object**: Individuals can object to the processing of their data in certain circumstances, including for direct marketing purposes.

To exercise any of these rights, individuals can contact the DPO of the POLARIN partner

10. Data Breaches

In the event of a data breach, POLARIN will notify the relevant supervisory authority and affected individuals within 72 hours if the breach poses a risk to their rights and freedoms.

11. Contact Information

For questions regarding this policy or to exercise data rights, please contact the Data Protection Officer (DPO) at Alfred-Wegener-Institut:

Christoph Wagner
datenschutz@awi.de
