

THE RESEARCH AND INNOVATION FOUNDATION'S PERSONAL DATA PROTECTION POLICY

1. General Information

1.1 The purpose of this Policy is to provide information to natural persons whose personal data are processed by the Research and Innovation Foundation ("RIF") , throughout its provision of services as data controller, in accordance with the principles and provisions of Regulation (EU) 2016/679 "General Data Protection Regulation" ("GDPR") and the Cyprus Law on the Protection of Natural Persons Against Personal Data Processing and the Free Movement of Such Data 125(I)2018, as amended from time to time.

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

1.3 Processing means any operation or set of operations which is performed by any person with or without help from automated means, and which is performed on personal data and includes the collection, recording, organization, storage, adaptation, alteration, use, transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2. Personal Data

2.1 The categories of personal data which the RIF can collect and process, including others, are the following:

- Identity data, such as, name and surname, age, sex, date of birth, identity card information, passport or other information relating to another form of identifier.
- Contact details, such as, address, telephone number, electronic mail address, and fax.
- Data related to funding.
- Information regarding researchers' travelling related to RIF activities, such as boarding passes, place of stay, tickets, IBAN, SWIFT, bank account number.
- Information contained in the Curriculum Vitae or other information related to education, previous employment, years of experience, research interests or other qualifications.

3. How and from where does the RIF collect personal data

3.1. The RIF adopts an electronic personal data entry system which covers submission and evaluation of research proposals, the monitoring of research projects, the archiving of documents and the management of customer relationships. As a result, the collection of personal data will, for the most part, be effected through the electronic system, except where they are submitted by hand, mail, electronic mail or otherwise.

3.2. The collection and processing of personal data occurs at any time and throughout the following:

- Legal checks and assessments for inclusion of bodies in the category of beneficiaries, as those are defined in the RIF's Program Announcements,
- Submission, evaluation of research proposals and/or applications for support measures and/or funding and/or applications for tenders and preparations of research projects contracts, and/or financing contracts for other activities,
- Supervision of the implementation and financing of research projects or other financing measures,
- Promotion of participation in research programs and other supporting and/or funding measures, and/or competitions,
- Communication for providing targeted information, such as for example information: (a) for research collaborations and submission of research proposals, (b) business collaborations aimed at transfer of technology and know-how, (c) participation in information events on technology research and technological development.
- Statistical analysis of data and preparation of reports for competent national bodies,
- Evaluation of the effectiveness of the programs and procedures of the RIF. For these purposes, external experts shall communicate with the persons participating in the RIF's funded programs.

3.3. Moreover, the personal data are provided to the RIF indirectly via third parties, in accordance with the relevant legislation, for the purposes set out below, such as for example, where a person participates in a research project and his/her personal data are submitted through a Contractor and the Project Coordinator.

4. Legal basis and purpose of processing

4.1. The RIF is allowed to process personal data only if at least one of the legal bases provided for in the GDPR apply. That is when:

- The processing is necessary for the execution or preparation of a contract to which the data subject is a party (contractual obligation).
- The processing is necessary for the RIF's compliance with a legislation or regulation. (legal obligation).
- The processing is necessary in the public interest. (public interest).
- The processing is necessary to safeguard the data subject's vital interest. (vital interest).
- The processing is necessary to pursue the legitimate interests of the RIF, provided that they do not exceed the rights and freedoms of the data subject. (legitimate interest).
- The data subject's consent has been obtained. (consent).

4.2. The table below lists the main personal data processing activities, as well as the legal bases on which the RIF relies on each situation.

	<u>Processing Activity - Purpose</u>	<u>Legal Basis</u>
1	Informing the research community via electronic means on issues relating to research and innovation.	Consent
2	Legal checks and assessments of bodies and their inclusion in the category of beneficiaries, as those are defined in the RIF's Program Announcements.	Compliance with the applicable state funding regulations or other relevant regulations relating to the funding framework at the time.
3	Evaluation of research proposal or application for support/financing and contract preparation	Contractual obligation.
4	Monitoring of research projects funded by the RIF and verification of expenditure eligibility.	Contractual obligation Legitimate interest
5	Evaluation of the effectiveness of RIF's programs and procedures. External experts communicate with the persons who submit proposals or receive other services relating to the RIF's or the European Commission's funded programs.	Legitimate interest
6	Conducting school competitions and Awards by	Legitimate interest

	the RIF and the Ministry of Education	Parental consent
7	Serving the research community while visiting or communicating with the RIF	Legitimate interest
8	Third-party payment on the market of services / consumables / equipment etc.	Contractual obligation
9	Protection of facilities, systems and services / network security	Legitimate interest
10	Statistical analysis / preparation of reports with regards to the research and research web in Cyprus	Legitimate interest

5. Confidentiality

All personal data will be collected and processed with the utmost confidentiality by the RIF's employees, executives and competent institutions. It should be noted that in cases where the participation in programs and/or support / funding measures fall within the competence of the Board of Directors of the RIF to inform and make final decisions, the personal data are transmitted to the Members of the Board of Directors and/or to external experts or advisors who support the work of the Board of Directors, who are committed to respecting the principle of confidentiality.

6. Disclosure and recipients of Personal Data

6.1. Unless so permitted by law or required by Court order, personal data shall only be disclosed to the third parties (data recipients) referred to in this Policy. Very limited and basic information on funding or other activities of the RIF will be published on the RIF's website (www.research.org.cy) for transparency purposes. The information published on the website may relate to information on funded projects such as: protocol number, title, project summary, name of Project Coordinator, name of Collaborating Bodies and/or persons, project budget and RIF funding.

In addition, when requested, the RIF shall provide the data concerning the implementation of research projects or financing measures to the Managing Authority (the Directorate-General for European Programs, Coordination and Development), the Certification Authority (Treasury of the Republic of Cyprus), the Audit Authority (Internal Audit Service), and the Monitoring Committee of the Operational Program.

6.2. In addition, when requested, it shall provide information concerning the implementation of research projects or financing measures to all competent auditing bodies of Cyprus (Audit Office) or the European Union (when applicable), or to their

authorised representatives or external experts who provide services to the RIF for purposes of evaluation of the project implementation or for purposes of auditing the financial scope of the projects and the provision of financing. Part of the archive concerning the projects which are co-funded by the Structural and European and Structural Investment Funds (ESIF) is linked electronically with the archive of the Managing Authority of ESIF (Directorate-General for European Programs, Coordination and Development).

6.3. Personal data may also be disclosed to professional consultants and service providers, including auditors, legal advisor, external consultants, on the basis of RIF's legitimate interest, when required by applicable laws/regulations or subject to the consent where necessary.

The sub-contractors who process the personal data on behalf of the RIF, based on an agreement with the RIF, process the personal data only on RIF's documented instructions and are obliged to process such data by taking the appropriate safety measures.

6.4. The RIF's local archive is located in its offices (123 Strovolos Avenue, 2042 Nicosia) and at the premises of a private record-keeping company (Iron Mountain Cyprus Ltd).

The information registered in the RIF's electronic system, are stored on the servers of the companies COSMOS & ALL WEB which have undertaken the development and maintenance of the electronic system on behalf of the RIF.

The company Iron Mountain Cyprus Ltd and COSMOS & ALL WEB take all necessary technical and organizational measures and act as processors of RIF. As mentioned above, they process the personal data only upon written instructions and guidance by the RIF, as the Controller of the personal data.

7. Personal Data Transfers

The personal data may be transferred to European organisations, in accordance with instructions by the involved persons, as well as to external experts for the scientific evaluation of proposals or projects from member states of the European Union, the European Economic Area (Iceland, Norway, Liechtenstein), Israel and Switzerland and/or to third countries in accordance with the provisions of the GDPR and Cypriot legislation 125(I)2018.

8. Security

The RIF is committed to safeguarding the confidentiality, integrity and availability of the personal data it processes. The priority is to avoid data breach incidents, including data alteration and prevention of unauthorised access to the RIF's systems. In any case, software security safeguards are used as well as other technical and organisational

measures for the protection of personal data from loss, unauthorised access, alteration, destruction and any other breach of security. Moreover, the RIF adopts measures which include, amongst others, the use of pseudonyms (pseudonomisation) and other approved methods of encryption.

9. Maintenance of Personal Data

9.1. As a rule, the RIF processes and retains personal data only where it is necessary for fulfilling the purposes set out above, and in particular:

- When relying on and for the duration of the data subject's consent.
- Up to five (5) years from the date of submission of a research proposal or application for the support / funding and contract preparation for evaluation purposes of the proposal or application.
- Up to ten (10) years from the date of granting the funding, for purposes of complying with the applicable regulatory framework of state aid, specifically relating to projects which are co-financed by the Structural and European and Structural Investment Funds (ESIF),
- For as long as is required by specific legislation (eg. Taxation, audits, accounting), applicable state funding regulations and/or other relevant regulations which relate to the specific funding framework.
- For as long as the personal data are necessary and vital for the foundation, exercise or support of legal claims, either in court proceedings or in administrative or any out-of-court proceedings.

9.2. It is clarified that, personal data may be retained for statistical purposes, for research proposals which are not funded, as well as for proposals which are approved and funded (research projects) for as long as necessary. The processing shall be subject to appropriate safeguards in accordance with the GDPR and in particular Article 89, with regards to the rights and freedoms of the data subject. For example, the RIF applies pseudonymization techniques to these data, as well as organisational and security measures which limit access to these data to the authorized persons. When this processing is rendered unnecessary for these purposes, the personal data are deleted. Moreover, provided that these objectives can be fulfilled by the RIF by further processing which does not allow the identification of data subjects (ie. Data are anonymised), these purposes will be fulfilled in this manner.

10. Natural Persons' Rights

10.1 The data subjects have and can exercise the right to:

- Receive details relating to their personal data and to request access to such data.
- Request to complete or correct any incomplete or inaccurate data.

- Request the deletion of their personal data, especially when there is no lawful reason for the RIF to continue the processing.
- To object to the processing of their personal data, especially when the RIF relies on its legitimate interests.
- To request the restriction on the processing of their personal data in order to limit the processing eg. when they are no longer relevant, but want to retain the data for any use in possible legal claims.
- Request to receive their personal data in a structured and commonly used format, and/or to transfer those data to another controller.
- To revoke the consent they gave to the RIF at any time but without affecting the lawfulness of the processing on the basis of the data subjects' consent before its withdrawal.
- To submit a written complaint to the Office of the Commissioner for Personal Data Protection (<http://www.dataprotection.gov.cy>).

10.2. It is noted that the data subject can modify their personal data either via the RIF's electronic system (<https://iris.research.org.cy>), for those with access to the IRIS system, or via related request which shall be sent to the address 123 Strovolos Avenue, 2042 Nicosia, P.O. Box 23422 1683 Nicosia. For any questions regarding this Policy, or any other issues relating to the data processing by the RIF, please contact the RIF's Data Protection Officer (Katia Nicolaidou).

Katia Nicolaidou
Research & Innovation Foundation
123 Strovolos Avenue
2042 Nicosia
Email: dataprotection@research.org.cy
Tel. 00357 22 205000

11. Policy updates

The RIF reserves the right to modify this Policy from time to time. Any such modifications will be published on the RIF's website (www.research.org.cy) and the RIF's electronic system (<https://iris.research.org.cy>).

12. Receiving information regarding this Privacy Policy

12.1. Where the personal data of persons are provided to the RIF through a third party (for example by the Contractor and/or Project Coordinator who assumes a management and coordinating role for purposes of the research project), then the third parties undertake the responsibility to confirm to the RIF that they have informed the data

subjects of the content of this Policy and of the possibility of communicating such data to the RIF. It is understood that in case of non-signature of this document, the RIF reserves the right to refuse the receipt of any personal data on behalf of the Coordinator and/or Project Coordinator and the examination of any of their request / proposal.

This Policy is published on the RIF's website (www.research.org.cy) and on the RIF's electronic system (<https://iris.research.org.cy>).

I have read and fully understood the above and sign:

(Full Name)

(Signature)
Project Coordinator

ID. No.

(Date)

(Full Name)

(Signature)
Legal Representative
of the Contractor

ID. No.

(Date)