

Council of Europe grant award procedures

Privacy Notice

17 October 2024

The present privacy notice explains how the Council of Europe processes personal data for the purpose of grant procedures.

1. Who is responsible for data processing?

The Council of Europe is the “data controller” with respect to the processing of personal data in relation to grants, which means it has the decision-making power concerning the data processing.

Processing of your personal data is governed by the [Council of Europe Regulations on the Protection of Personal Data](#) adopted by the Committee of Ministers on 15 June 2022.

2. What data do we process and for what purpose?

2.1 Grant applications

We process personal data that we receive from the applicants in grant award procedures, either in response to a call for proposals or during the process to award a grant directly. This includes personal data of individual applicants or, where the applicants are legal entities, of their representatives, contact persons, members of the governing board or equivalent body, and owners. If the applicant intends to involve providers of goods or services, where such providers are individuals, we may also process their personal data.

Where the applicant is an individual, we process the following categories of personal data: name and surname; legal form, registration number and country of registration, if she or he is registered as an entrepreneur; postal address; e-mail and phone number; bank details; information about recent activities; information related to the proposal and the applicant’s operational and financial capacity; and information relevant to the exclusion criteria.

Where the applicant is a legal entity, we process name(s), surname(s) and position(s) of its representative(s); as well as the name, surname, e-mail address and phone number of its contact person. We also process name(s) and surname(s) of the applicant’s owner(s) and information relevant to the exclusion criteria in respect of the applicant’s owner(s) and executive officer(s).

While information relevant to the exclusion criteria is initially submitted in the form of a declaration, at a later stage, we may ask for an extract from the record of convictions or an equivalent document and/or for a certificate issued by the competent authority attesting to compliance with obligations as regards payment of social security contributions, taxes and dues. We may also ask individual applicants for a scanned copy of a valid photographic identity document.

We process the above personal data for the purposes of registering the application, assessing eligibility and compliance with the exclusion criteria, evaluating the project, communicating the results to the applicant, and, should the applicant’s project be selected, for preparing the grant agreement for signature, and effectuating transfer of funds under the agreement.

2.2 Publication of the award decision

We annually publish information about awarded grants on [the Council of Europe website](#). This information includes the title of the grant agreement, the nature and purpose of the agreement, the name and country of the grantee, and the amount of the agreement. If the grantee is an individual, such publication will accordingly include his or her personal data. During the grant application stage,

applicants may indicate any objections to the publication of the aforementioned information in the application form.

2.3 Reporting

With regard to implementation of the funded action and the follow-up thereto, the grantee has to provide the Council of Europe with a narrative report and a financial report.

2.3.1 Narrative report

A comprehensive narrative report on the use of the grant may include personal data of stakeholders and beneficiaries. This could involve providing a copy of the register containing names and signatures of participants present during the activities that form part of the funded action.

When a grant is awarded under a European Union-Council of Europe Joint Project, the narrative report may include information on civil servants or members of the public administration who were engaged in the funded action, if applicable. Specifically, in respect of each civil servant or a member of the public administration engaged, such information should include their names, country, function in the public institution (as well as the name of the institution), dates of engagement and fees received, description of the activity for which they were engaged and justification for their selection.

2.3.2 Financial report

The financial report consists of a statement listing all payments made for activities included in the funded action, accompanied by appropriate supporting documents. These documents may include signed contracts, invoices, work acceptances, and other reliable evidence of payment. Such documents may contain personal data of individuals acting as service providers (e.g., consultants) or representatives of legal entities.

In particular, supporting documents for round tables/conferences should include a programme listing the names of event facilitators and a signed participant list. Supporting documents for travel expenses of experts and participants, including transportation and lodging, may contain information such as names of travellers, travel dates, destinations, itineraries, and accommodation details.

3. What is the legal basis for our processing of personal data?

We process personal data on the basis of the Council of Europe's legal instruments and its internal rules in order to carry out activities necessary for the performance of the Council of Europe's tasks. In particular, on the basis of the [Financial Regulations and supplementary provisions of the Council of Europe](#) and [Rule No. 1374 of 16 December 2015 on the grant award procedures of the Council of Europe](#).

Where the funds for the grant are provided by a donor organisation, we also process personal data on the basis of the agreement with the donor organisation, such as the Financial Framework Partnership Agreement between the European Commission and the Council of Europe.

4. Who has access to personal data?

Only those persons within the Council of Europe who assess applications for grants and oversee implementation of the funded actions have access to the personal data.

Information about awarded grants published on [the Council of Europe website](#), which includes personal data where grantee is an individual, is publicly accessible.

Where the funds for the grant are provided by a donor organisation, narrative report may be shared with the donor.

Personal data may be disclosed to the relevant bodies of the Council of Europe for the sole purposes of internal and external audit and to the Committee of Ministers and Parliamentary Assembly of the Council of Europe with a view to these latter discharging their statutory functions. They may also be

disclosed to auditors appointed by a donor organisation, such as the European Commission, where it provides funds for the grant.

5. How do we store personal data?

Personal data are stored electronically on the Council of Europe's servers located in the European Union. We have put in place measures to protect the security of your personal information, including appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. These measures include encrypted servers, limited access to any databases only for those people who need it and secure backup of all data.

6. How long will personal data be stored?

Personal data processed in relation to a grant award procedure shall be stored for the minimum of ten years for the purposes of reporting, in accordance with Article 64 of the [Financial Regulations and Supplementary Provisions of the Council of Europe](#) and Article 18 of [Rule No. 1374 of 16 December 2015 on the grant award procedures of the Council of Europe](#). The ten-year period shall begin on the date of the grant award for personal data contained in applications, and on the date of the last complete narrative or financial report for personal data related to the implementation of the funded action.

7. What are your data protection rights?

You have the right to:

- request access to your personal information held by us;
- request that we correct incomplete or inaccurate personal information that we hold about you;
- request that we delete or remove your personal information when there is no valid reason for us to keep it;
- object to the processing of your personal information on specific grounds relating to your situation.

8. Contacts

If you wish to exercise the above rights, or for any queries, concerns, or requests you may have in connection with the way your data is collected and used, please contact the Council of Europe by sending an email to the Council of Europe's Data Protection Officer at dpo@coe.int.

If you feel that we have not adequately responded to your request and consider that your data protection rights have been violated as a result of our processing of your personal data, you have the right to lodge a complaint with the Council of Europe Data Protection Commissioner by sending an e-mail to dataprotection@coe.int.