

Privacy Notice

Eurimages Promotion Programme - Call for proposals, sponsorships (“Call for proposals”)

1. Who is responsible for data processing?

Eurimages (also referred to as “the Fund”) is the “data controller” with respect to the processing of personal data in relation to the Call for proposals, 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 applicants in response to the Call for proposals. This includes personal data of the representatives, contact persons, members of the governing board or equivalent body, and owners of the applicant. If the applicant intends to involve providers of goods or services, where such providers are individuals, we may also process their personal data.

We process name(s), surname(s), job titles, e-mail addresses, phone numbers, and postal addresses of contact person(s) and legal representative(s) of the applicant. 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) or 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 their obligations as regards payment of social security contributions, taxes and dues. We may also ask for an extract from the companies register or other official document proving ownership and control of the applicant.

We may also process other incidental and unsolicited data, such as third-party personal data contained in supporting documents submitted by applicants, which may include sensitive data. We do not require the submission of any sensitive information as part of the application process. If applicants choose to provide such information, they do so at their own discretion, and it is their responsibility to ensure they are legally authorised to submit such data. Any sensitive data voluntarily submitted will be used solely for the purpose of evaluating the proposal.

All the personal data referred to above shall be referred to forthwith as the ‘Proposal Data’.

We process the Proposal Data for the purposes of registering the application, assessing eligibility and compliance with the exclusion criteria, evaluating the proposal, communicating the results to the applicant, and, should the applicant’s proposal be selected, for preparing the

grant agreement for signature, effectuating transfer of funds under the agreement, and for the purposes of any subsequent internal or external audit.

The Proposal Data is communicated to the Board of Management and Executive Committee of Eurimages and, for eligible proposals only, to the external experts¹ who will assess the proposals.

2.2 Publication of the award decision

We will publish on the Internet the information on proposals supported under the Call for proposals. This information may include 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. The information on the nature and purpose of the agreement may contain personal data insofar as relevant to the grant award. 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 initiative and the follow-up thereto, the grantee has to provide Eurimages with a narrative and promotional report as well as a financial report.

2.3.1 Narrative and promotional report

The comprehensive narrative and promotional report on the use of the grant and visibility given to Eurimages 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 initiative and/or photos of the participants.

2.3.2 Financial report

The financial report consists of a final cost report and final financing plan of the funded initiative. Upon request by Eurimages, the grantee may have to provide 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.

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 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, with regard to the Call for proposals, we process personal data on the basis of the applicable Call for proposals and the Rules of Procedure of the Board of Management and of the Executive Committee of Eurimages, as well as the External Experts Guidelines.

¹ External experts sign a framework agreement with Eurimages which includes a confidentiality clause.

4. Who has access to data?

Only those persons within the Council of Europe who assess applications for grants and oversee implementation of the funded initiatives, internal and external auditors, the members of the Board of Management and of the Executive Committee of Eurimages and the external experts who assess the applications will have access to them. The data processor we use to submit and process proposals is SurveyMonkey. Information on the security and privacy of SurveyMonkey can be found on their website [here](#).

The general public may access information about the funded initiatives published on the website of the Fund as well as in printed brochures and other material.

5. How do we store personal data?

Personal data submitted by applicants will be 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. Data provided via SurveyMonkey is stored in the US, Canada, and Ireland (EU), ensuring compliance with regional data protection standards and subject to the storage policy applicable to SurveyMonkey (Ireland).

6. How long will data be stored?

Personal data provided by applicants will be stored for as long as necessary to support the activities of Eurimages.

OR?

Personal data processed in relation to the Call for proposals shall be stored for a 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](#). The ten-year period shall begin for personal data contained in applications on the date of the submission of the application. In case of supported proposals, the ten-year period shall begin for personal data contained in applications and documents related to the implementation of the proposal on the date after closure of the file (the date of the payment of the last instalment and further to the acceptance of the complete narrative and financial reports).

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 eurimages-promotion@coe.int.
- 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 datacommissioner@coe.int.