PRIVACY NOTICE

Use of FlowForma- digital business process tool supporting the CAJU in its daily operations

1. Introduction

This privacy notice explains how the Clean Aviation Joint Undertaking (CAJU) uses any information you give to us, and the way we protect your privacy. Furthermore, it describes the rights you have as a data subject and how you can exercise these rights. CAJU protects the fundamental rights and freedoms of natural persons and in particular their right to privacy with respect to the processing of personal data. We provide the following information based on articles 14 to 16 of the Regulation.

Processing operations are under the responsibility of Executive Director of the CAJU - the Controller.

The CAJU may be contacted by sending an e-mail to info@clean-aviation.eu or at the following postal address: TO 56-60, 1049 Brussels, Belgium.

The CAJU has appointed a Data Protection Officer (DPO). The DPO can be contacted by sending an e-mail to Data-Protection@clean-aviation.eu or at the following postal address: TO 56-60, 1049 Brussels, Belgium.

2. Whose personal data do we process?

FlowForma is a digital process automation tool installed in the CAJU’s Share Point (part of the M365 suite, a cloud-based services platform owned by Microsoft) through which the CAJU implements a number of business processes that may require the involvement of external users other than CAJU internal M365 users.

This privacy statement concerns the following categories of data subjects:

- CAJU’s employees: staff, seconded national experts, interims or external service providers (ESP);
- Natural or private persons who responded to the CAJU’s call for expression of interests (CEI);
- Contractors: the successful Tenderers with whom the CAJU signed a contract for provision of supplies/services or works;
- Staff of the CAJU’s Private Members: Founding Members, Associated Members and their Affiliated Entities;
- Beneficiaries of the CAJU’s grant agreements;
- Representatives of the CAJU’s governance and/or advisory bodies: Governing Board, State Representative Group, Technical Committee and Scientific Advisory Board;
- Staff of the European Institutions, Agencies and Bodies which either requested from the CAJU access to information or which cooperate with the CAJU in the context of the signed service level agreements;
- Staff and representatives of Regions and/or Member States cooperating with the CAJU’s services in the spirit of development of synergies;
- Natural or legal persons which submitted to the CAJU a request for information or access to documents.

3. **Why do we process your data?**

3.1 **Purpose of the processing**

The personal data collected via FlowForma enable to the CAJU and an internal or external user to communicate more efficiently in the context of an individual business process like for example:

- Internal validation of specific contracts implementing framework service contracts, legal consultations, etc.;
- Establishment of list of eligible candidates who responded in one of the CEI launched by the CAJU with objective to sign with them an expert contract for provision of specialized services;
- Cooperation and communication with the contractors in the context of the execution of contracts awarded and signed with the CAJU;
- Cooperation and communication with the Private Members of the CAJU in the context of fulfilment of their membership’s obligation and providing them day-to-day support;
- Communication with the beneficiaries to share with them guidelines and presentations from workshops organised by the CAJU or providing them replies to general legal or financial queries concerning the interpretation of the provisions of the grant agreements;
- Communication with the representatives of the Governing Board, State Representative Group, Technical Committee and/or Scientific Advisory Board to enable them to perform their tasks within a mandate of a governance of an advisory body including requests for reimbursement;
- Processing of request for information, access to proposal or results generated by the CAJU’s beneficiaries and submitted by the staff of the other European Institutions, Agencies and Bodies pursuant to Article 36 of the Regulation (EU) 2021/2085\(^1\) or in accordance with the applicable service level agreements;
- Communication and exchange of information with the staff and representatives of Regions and/or Member States with the objective to ensure coherence and synergies among the research programmes and to maximise funding;
- Processing of requests and sending replies to the natural or legal persons who contacted the CAJU to exercise their rights pursuant to Article 17 of the Regulation (EU) 2018/1725\(^2\) and/or Article 2 of the Regulation (EC) No 1049/2001\(^3\).

### 3.2 Lawfulness of processing operation

The processing of the data is necessary and lawful under:

- Article 5(1)(a) of the Regulation (processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body);
- Article 5(1)(b) of the Regulation (processing necessary for compliance with a legal obligation to which the controller is subject);
- Article 5(1)(c) of the Regulation (processing necessary for the performance of a contract to which the data subject is a party);

### 3.3 Legal basis

Article 19.4(a): Ensuring sustainable and efficient management of the joint undertaking and efficient implementation of its work programme by the Executive Director of the CAJU.

### 4. Which data do we collect and process?

The following personal data are collected and processed:

- Contact details (eg. name, surname, name of a legal entity (employer), address of a legal entity’s registration, residence address of a natural person, correspondence address of a

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legal or natural person, nationality, professional email address or private email address used by a natural person for a purpose of a professional correspondence, IBAN and BIC codes, VAT number telephone number

- Special identification numbers (e.g. European Union institution’s, agency’s or body’s staff number)

5. **How long we keep your data**

The CAJU only keep your personal data for the time necessary to fulfil the purposes described above of collection or further processing.

For each category of data subjects concerned, please find additional information in the relevant record of the CAJU’s data protection register accessible under the following link: [https://www.clean-aviation.eu/clean-aviation-data-protection-register](https://www.clean-aviation.eu/clean-aviation-data-protection-register)

6. **Who has access to your data and to whom is it disclosed?**

Access to your personal data is provided to authorised staff of the Controller responsible for carrying out each processing operation based on the necessity and data minimisation principles. Such staff abide by statutory, and when required, additional confidentiality agreements.

Due to operational reasons, upon signature of the contract, your proposal and its annexes may be made available to third parties, such as:

- contractors in charge of handling the CAJU IT systems including M365 applications like SharePoint.
- authorized staff members of the external service providers supporting the CAJU in management of particular business process;
- Staff of the Commission, the Court of Auditors and OLAF to perform on-the-spot checks and to ensure the CAJU compliance with the applicable legal and financial rules.

The CAJU endeavours to ensure that third parties respect the confidentiality of data and implement data protection safeguards to guarantee the security of personal or other data.

7. **What are your rights and how can you exercise them?**

You have the right to access your personal data, the right to rectify them, if necessary, and/or to restrict its processing or erase them, if applicable. You are also entitled to object to the processing of your personal data, where applicable. You have the right to data portability, the right to withdraw consent and the right to not be subject to automated individual decision-making.

If you would like to exercise your rights under the Regulation, if you have comments, questions or concerns, regarding the collection and use of your personal data, please feel free
to contact the Data Controller as explained in section 8 below.

You can at any time directly access or rectify your personal data in the F&T Portal online. You may also change your EU Login password, which allows you to login to the system and update your personal information contained in your profile.

For more information, please refer to the ‘Detailed information regarding access to and review of your personal data’ or contact directly CAJU (the Controller).

You may contact the Data Protection Officer of the Controller and, if necessary, the European Data Protection Supervisor with regard to issues related to the processing of your personal data under the Regulation.

NB: Please note that access to your personal data and its modification or deletion may be restricted by the CAJU Internal Rules restricting data subjects rights as provided for by Article 25 of the Regulation. This is in order to safeguard the rights of other data subjects and/or to respect the principles of equal treatment among applicants and/or the secrecy of deliberations. In that context, these rights may be restricted by the CAJU on a case-by-case basis in line with the Internal Rules, where necessary and appropriate for the purposes. This restriction shall be proportionate to what is strictly necessary for the purpose of the processing.

8. Contact information

If you have comments or questions, any concerns or a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller by addressing your request to the following email address: Data-Protection@clean-aviation.eu

4 Adopted on 16 December 2021 by the CAJU Governing Board, as part of the Omnibus Decision CAJU-GB-2021-12-16, by which the Decision of the Governing Board laying down internal rules concerning restrictions of certain rights of data subjects in relation to processing of personal data in the framework of the functioning of the Clean Sky 2 Joint Undertaking CS-GB-Writ proc 2020-02, are directly transferred and shall apply to CAJU.