

INFORMATION CLASE FOR PEOPLE INVOLVED AND PARTICIPATING IN ACTIVITIES UNDER:  
EUROPEAN REGIONAL DEVELOPMENT FUND,  
EUROPEAN SOCIAL FUND+,  
COHESION FUND,  
JUST TRANSITION FUND  
EUROPEAN MARITIME, FISHERIES AND AQUACULTURE FUND

### **1. Data Controller**

The administrator of personal data is Sano – Center for Individualized Computational Medicine – International Research Foundation, Czarnowiejska 36 / C5, 30-054 Kraków, KRS: 0000797490, NIP: 6772446472 REGON: 384298430, e: [info@sanoscience.org](mailto:info@sanoscience.org), t: +12 307 27 37 hereinafter referred to as "Sano".

### **2. Data Protection Officer**

Contact with the appointed Data Protection Officer e: [iod@sanoscience.org](mailto:iod@sanoscience.org)

### **3. Purpose of processing**

We process personal data as part of Sano's activities in projects implemented under the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund, among others.

We process personal data in order to support the above-mentioned activities within a specific project, and in particular to:

- providing support,
- confirmation of the eligibility of expenditure,
- Monitoring
- Evaluation
- Control
- audits carried out by authorised institutions,
- Reporting
- project settlement,
- maintaining the sustainability of the project,
- Archiving.

We process personal data because:

- we perform legal obligations (Article 6(1)(c) of the GDPR) – legal bases below;
- we perform tasks in the public interest or as part of the implementation of a project (Article 6(1)(e) of the GDPR);

- it is necessary for reasons of important public interest and on the basis of EU law (Article 9(2)(g) of the GDPR);
- it is necessary for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes (Article 6(1)(c) of the GDPR and Article 9(2)(j) of the GDPR).

#### **4. Legal basis for processing**

- Regulation (EU) 2021/1060 of the European Parliament and of the Council of 24 June 2021 laying down common provisions on the European Regional Development Fund, the European Social Fund Plus, the Cohesion Fund, the Just Transition Fund and the European Maritime, Fisheries and Aquaculture Fund and financial rules for those and for the Asylum, Migration and Integration Fund, the Internal Security Fund and the the Instrument for Financial Support for Border Management and Visa Policy; ('General Regulation') – in particular Articles 44, 69, 72 to 74, 76 and 82;
- Regulation (EU) 2021/1057 of the European Parliament and of the Council of 24 June 2021 establishing the European Social Fund Plus (ESF+) and repealing Regulation (EU) No 1296/2013 ('Regulation (EU) No. ESF+'), in particular the Annexes;
- The Act of 14 July 1983 on the National Archival Resources and Archives (in particular Article 6) and the Regulation of 18 January 2011 of the Prime Minister on the office instruction, uniform material lists of files and instructions on the organization and scope of operation of company archives.
- Act of 6 April 1984 on Foundations (i.e. Journal of Laws of 2023, item 166).
- Act of 28 April 2022 on the rules for the implementation of tasks financed from European funds in the financial perspective 2021-2027,
- The Act of 27 August 2009 on Public Finance,
- Act of 19 July 2019 on Ensuring Accessibility for Persons with Special Needs.

#### **5. Categories of relevant data**

We process personal data:

- to the extent necessary for the implementation of a specific project,
- to the extent that they are provided to us directly by the data subject,
- to the extent that they are provided to us by another entity or other data administrator who will provide us with data in connection with participation or implementation of the project.

In particular, we may process personal data of project participants:

- data identifying natural persons, such as name and surname, address, e-mail address, company and address, login, telephone number, fax number, Universal Electronic System of Population Registration (PESEL), tax identification number (NIP), number in the national official register of entities of the national economy (REGON) or other identifiers functioning in a given country, legal form of business, form of ownership of the person's property, gender, age, education, online identifiers;
- data related to the scope of participation of natural persons in the project, not mentioned in point 1, such as working time, position, amount of remuneration, citizenship, area by degree of urbanization (DEGURBA), housing status, date of commencement of participation in the project or support, date of completion of participation in the project or support, status on the labour market, date of establishment of the business, amount of funds granted for the establishment of the business, code in the Polish Classification of Activities (PKD) of the established business activity, form and period of involvement in the project, planned date of completion of education in the educational institution where the support was used;
- data of natural persons not listed in point 1, which appear on the documents confirming the eligibility of expenses, including the amount of remuneration, bank account number, plot number, commune, precinct, land and mortgage register number, gas connection number, building licence number, and data on the special needs of persons referred to in Article 2(3) of the Act of 19 July 2019 on ensuring accessibility to persons with special needs.

## **6. Audience Information**

The recipients of personal data will be:

- persons authorized by the personal data administrator (employees, associates of Sano),
- entities authorized under the law (including data will be made available to the minister competent for regional development, offices, e.g. the Marshal's Office, control and audit institutions),
- service providers in areas such as: postal or courier services, operators of electronic communication platforms, entities developing or providing IT systems necessary for the implementation of the project, entities providing archival services, contractors of services in the field of evaluation research, expert opinions and analyses, translations,
- to the extent constituting public information, the data will be disclosed to anyone interested in such information.

Data may only be transferred within the limits permitted by law. The data subject can obtain detailed information about the recipients by contacting the Data Protection Officer.

## **7. Retention period**

- Personal data will be stored in accordance with the legal requirements for the storage of project documentation and, depending on the type of documents, it will be:
  - - not less than 10 years from the end of the project. The duration of data storage has been set to enable compliance with legal obligations, including the possibility of auditing by authorized inspection institutions
  - - for a period of five years from 31 December of the year in which the Managing Authority made the last payment to the beneficiary, in accordance with the rules laid down in Article 82 of the General Regulation, without prejudice to the rules governing the sustainability of the project, the rules governing state aid and the national rules on archiving documents.

## **8. Rights of the data subject:**

The data subject has the following rights:

- Access;
- Rectification;
- Remove;
- restriction of processing;
- object to the processing of
- Move.

Detailed information on rights can be found at this [link {link to the data subject's rights}](#).

## **9. Information on the right to lodge a complaint with the supervisory authority:**

The data subject has the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or place of the alleged infringement of the GDPR.

## **10. Requirement to provide data:**

Providing personal data is an obligation that results from the provisions of law, including the Act on the rules for the implementation of tasks financed from European funds in the 2021-2027 financial perspective. Failure to provide data will prevent participation or involvement in the project.

**11. Source of data:**

We have received personal data from the data subject directly (e.g. application for participation in the project, notification of involvement in the project), or indirectly from another data controller or other entity that will provide us with data in connection with participation or implementation of the project.

Personal data will not be subject to automated decision-making, including profiling."