



Data Protection Notice for the EIC Accelerator

This data protection notice provides you information about the processing of your personal data related to the Submission, Selection and Management of your EIC Accelerator application.

This includes:

- Submission of applications;
- Evaluation and selection of applications;
- Matching EIC Accelerator applicants with business coaches supporting the applicants to prepare their full proposals;
- Organisation of evaluation interviews for EIC applicants;
- Management of the grants/contracts.

Your personal data is processed in accordance with Regulation (EU) No 2018/1725¹ on the protection of individuals with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data.

The joint data controllers of this processing operation are:

- The **European Innovation Council and SMEs Executive Agency (EISMEA)**², represented by the Director.
- The **EIC Fund**, represented by the Chairperson of the **EIC Fund** Board of Directors, 15 Boulevard Friedrich Wilhelm Raiffeisen, LU-2411 Luxembourg, in charge of the investment component of the EIC Accelerator³.

In addition, the following **entities process** your personal data on behalf of the joint controllers:

1. EIB – European Investment Bank, 98-100, boulevard Konrad Adenauer, L-2950 Luxembourg, <https://www.eib.org/fr/infocentre/contact/index.htm> The EIB acts as investment adviser for the EIC Fund in particular for the due diligence process in the context of EU funded equity for beneficiaries.

2. Alter Domus Luxembourg S.à r.l., 15 Boulevard F. W. RaiffeisenBP 2501, L-1025 Luxembourg, <https://www.alterdomus.com/contact-us>.

Alter Domus:

- performs additional data collection and checks of potential beneficiaries of the EU funded equity component through the ‘Know your Company’ form;
- participates in the valuation of the potential beneficiaries of EIC Fund equity component;
- makes available detailed information on the potential beneficiaries of the EU funded equity component and their projects for decisions of the EIC Board according to the procedures in place;
- performs the accountant and paymaster function for the EIC Fund.

3. Dealflow.eu BV, Moerstraat 31, 2970 Schilde, Belgium, <https://dealflow.eu/aboutus>.
Dealflow.eu:

- presents the portfolio of selected companies for the EU funded equity to investors for co-

¹ Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (OJ L295/39 of 21.11.2018).

² Commission Implementing Decision (EU) [2021/173](#) of 12 February 2021 establishing the **European Innovation Council and SMEs Executive Agency** (OJ L 50/9 of 15.2.2021).

³ The EIC Fund investment Guidelines are available on the [EIC website](#). They will notably cover in full detail the investment conditions of the EIC Fund.

- investments;
- analyses available documentation about potential beneficiaries;
- helps potential beneficiaries improve their pitch-deck and the underlying business case;
- organises e-pitching activities;
- undertakes additional due diligence complementary to the one of the EIB;
- helps with data collection and data structuring related to the investment phase.

On which legal basis do we process your personal data?

The processing of your personal data is based on:

- Article 5(1)(a) of Regulation (EU) 2018/1725 because processing is necessary for the performance of a task carried out in the public interest by the joint controllers⁴ laid down in Union law for the implementation of the applicable EIC work programme⁵ under Horizon Europe⁶ and
- Article 5(1)(d) of Regulation (EU) 2018/1725 based on your explicit prior consent for the processing of non-mandatory personal data as outlined below.

Why do we collect your personal data?

The purpose of this processing is the Submission, Selection and Management of EIC Accelerator application.

Personal data are collected and used only to the extend necessary and for the following processes:

- The **application process** consists of the following steps:
 - **Step 1 – short proposal:** applicants are required to elaborate and submit *a short proposal* on-line⁷ including a video and a pitch-deck presenting the team and the idea. This proposal is then assessed remotely by EIC evaluators. Prior to the submission, applicants are required to obtain a Participant Identification Code (PIC)⁸ and an EU Login⁹. Subject to the applicant's consent, the proposal or a limit set of data may be shared with relevant Horizon Europe National Contact Points (NCPs), Enterprise Europe Network (EEN) members and other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), in order to further support the applicant with additional services.
 - **Step 2 – full proposal:** Successful applicants of Step 1 will be invited to elaborate a *full proposal* and submit it through the Funding and Tenders portal¹⁰ with the support of an EIC business coach upon request. Step 2 applications will be assessed remotely by EIC evaluators.
 - **Interviews:** Successful applicants of Step 2 will be invited to a face-to-face or online interview with an EIC jury as the final step in the selection process. The contact details of

⁴ [Commission Decision C\(2021\)949](#) delegating powers to the **European Innovation Council and SMEs Executive Agency** with a view to the performance of tasks linked to the implementation of Union programmes in the field of Innovative Europe, Single Market and Interregional Innovation Investments comprising, in particular, implementation of appropriations entered in the general budget of the Union.

⁵ Commission Implementing Decision [C\(2022\)8600](#) of 7 December 2022 on the financing of the European Innovation Council component of the Specific Programme implementing Horizon Europe – the Framework Programme for Research and Innovation (2021-2027) and on the adoption of the **Work Programme for 2023** as well as future EIC work programmes to be adopted (see Reference Documents in [Funding and Tender Portal](#)).

⁶ [Regulation \(EU\) 2021/695](#) of the European Parliament and of the Council of 28 April 2021 establishing Horizon Europe – the Framework Programme for Research and Innovation, laying down its rules for participation and dissemination, and repealing Regulations (EU) No 1290/2013 and (EU) No 1291/2013 (OJ L 170, 12.5.2021, p. 1–68).

⁷ [EIC Accelerator \(europa.eu\)](#)

⁸ [Participant Identification Code \(PIC\)](#)

⁹ EU Login is the European Commission's Authentication Service: [EU Login](#)

¹⁰ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/home>

the participants to the interviews are also used to inform them of additional EIC services¹¹.

- To obtain the **Seal of Excellence**, the applicant must agree to share the proposal or a set of data with relevant national or regional funding bodies to help the applicant to acquire (alternative) financial support.
- For further support with **additional services** some information of the application may be shared with Horizon Europe National Contact Points (NCPs), Enterprise Europe Network (EEN) members or other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), based on the applicant's consent.
- **Grant / Investment Agreement:** Following a successful interview, applicants selected for funding will be invited to the grant agreement preparation and to negotiate an agreement for the investment component and eventually start the due diligence process for the EU funded investment component, when applicable.
- **Signature:** Following a successful grant agreement preparation and/or negotiation of the investment component, the applicant is invited to sign a grant agreement and/or investment agreement for the investment component.
- If the application is selected for support through an investment component, based on the applicant's consent, the European Commission, EISMEA and other actors involved in the management of the action (e.g. EIC Fund, Alternate Independent Manager of the EIC Fund, European Investment Bank, etc.) will find a suitable Investment Partner to co-invest alongside the EIC Fund and to share necessary information, including personal data, with these Investment Partners.

b) The **selection** process of **EIC evaluators**:

EIC evaluators are selected from the Horizon Europe experts database (Funding and Tenders Portal¹²) taking into consideration their skills, experience and knowledge and in accordance with the principles of non-discrimination and equal treatment.

c) The **selection** process of the **EIC business coaches** is as follows:

- The candidate coaches reply to the call for expression of interest for setting up of a list of coaches to provide coaching activities in connection with the EIC¹³.
- A list of EIC business coaches who meet the criteria set in the call of expression of interest is established in accordance with the principles of non-discrimination and equal treatment.
- Successful EIC applicants of Step 1 can select their coach to help them elaborate the Step 2 full proposal, from a list of EIC business coaches taking into consideration their skills, experience and knowledge.
- EISMEA establishes the contracts for the EIC business coaches selected by the EIC applicants.

d) The **selection process of EIC Jury** members:

EIC Jury members are selected from the Horizon Europe experts database (Funding and Tenders Portal), after a pre-selection if needed taking into account also other sources of information (i.e. social media), and considering their skills, experience and knowledge and in accordance with the principles of non-discrimination and equal treatment to set up a list of EIC Jury members.

In case the Jury interviews (pitching sessions) are conducted online, European Commission vetted third party video conferencing tools will be used (eg via Webex, Teams) covered by their specific Data Protection Notice.

¹¹ https://eic.ec.europa.eu/eic-funding-opportunities/business-acceleration-services_en.

¹² <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/work-as-an-expert>.

¹³ https://eic.ec.europa.eu/eic-funding-opportunities/business-acceleration-services/coaching-under-eic_en.

- e) **Negotiation module:** In case your proposal is selected for support through an EU funded investment component, the joint controllers may find a suitable Investment Partner to manage the EIC Investment component, and share necessary information, including personal data, with these Investment Partners, based on the applicant's explicit prior consent.
- f) **Helpdesk and support to end-users:** third party online tools (such as zoho.eu) may be used to collect, manage and respond to questions submitted by users providing support to recurrent key questions and issues.
- g) The EIC IT Platform may also be used for the **management of the grants/contracts**, including the investment component.

From whom do we collect personal data?

Personal data of the following data subjects are collected:

- EIC applicants including relevant team members;
- EIC evaluators (Horizon Europe experts);
- EIC jury members (Horizon Europe experts);
- EIC Business Coaches (Horizon Europe experts);
- Horizon Europe National Contact Points¹⁴ (NCPs) and other relevant public organisations from EU Member States (including regional innovation organisations, European Structural and Investment Funds¹⁵ (ESIF) Managing authorities etc);
- Authorised staff of EU Institutions in charge of implementing the Horizon Europe / EIC programme;
- Authorised staff of the European Investment Bank (EIB);
- Authorised staff of the EIC Fund in charge of implementing the EIC investment component and authorised staff of their contractors.

Which of your personal data are or may be collected?

For the **EIC application**: your first name, last name, gender, e-mail address, phone number, address and country of residence, nationality as well as CV, competences, experiences, expertise by means of questionnaires.

All **users** of the EIC IT tools and services are required to sign up for 'EU login' credentials. The 'EU login' service has its own privacy statement¹⁶.

EIC IT platform stores the 'EU login' credentials: login and e-mail addresses such as retrieved from 'EU login' and the European Commission's Central User Database which is stored at the Data Centre of the European Commission subject to Regulation (EU) No 2018/1725.

Data collected are **mandatory** for the purpose(s) outlined above, unless indicated otherwise in the application/submission forms.

In addition, for the **evaluation jury interviews**, the following data are collected: date of birth, Passport/ID number, organisation and function in the organisation, professional e-mail address, phone number, the registration number in the participant portal, contract of employment, most recent salary slip, company registration act and/or its statutes. These personal data are **mandatory** to verify the legal and contractual link between the applicant company invited to the jury interview and its representative attending the jury interview; as well as to permit access to the European Commission/Agency buildings where the interviews are taking place in case of physical meetings.

Some **non-mandatory** personal data may be collected such as your photo, your LinkedIn/Twitter account etc. which can only be processed based on your explicit prior consent.

¹⁴ <https://ec.europa.eu/info/funding-tenders/opportunities/portal/screen/support/ncp>.

¹⁵ https://ec.europa.eu/regional_policy/en/atlas/managing-authorities.

¹⁶ EU Login Privacy Statement: <https://ecas.ec.europa.eu/cas/privacyStatement.html>

Additional personal data from other EU or public databases may be used for the process of the Submission and Selection of applications to the EIC Accelerator.

Who will or may get access to your personal data?

The recipients of your personal data will be:

- Authorised staff of the EU Institutions and of its contractors in charge of the implementation of the Horizon Europe / EIC Accelerator;
- Authorised staff of the EIC Fund and its subcontractors supporting key processes and data collection (eg EIB, Alter Domus Luxembourg S.à r.l., Dealflow.eu BV);
- Security personnel of EU Institutions, in case of physical meetings;
- Authorised Staff of EISMEA or Commission's contractors¹⁷ responsible for providing the IT solution for the implementation of the EIC Accelerator.
- EIC experts such as EIC evaluators, jury members, coaches and due diligence experts, including EIB staff and authorized contractors;
- Bodies charged with monitoring inspection or enforcement tasks in application of EU or national law (e.g. internal audits, Court of Auditors, European Anti-fraud Office (OLAF), European Public Prosecutor Office (EPPO), European Ombudsman and the Courts of the European Union, national courts, law enforcement bodies).

Access to personal data of the EIC applicants may also be given to relevant Horizon Europe National Contact Points (NCPs) and other relevant public organisations from EU Member states and Horizon Europe associate countries (including regional innovation organisations, European Structural and Investment Funds (ESIF) Managing authorities etc), based on your explicit prior consent.

In case your proposal is selected for support through an EU funded investment component, the EIC may find a suitable Investment Partner to manage the EIC Investment component and may share necessary information, including personal data, with these Investment Partners, based on your explicit prior consent.

The European Union institutions and the EIC Fund will not share your personal data with other third parties unless allowed by law or necessary for the provision of the above-mentioned services for which you have given your explicit prior consent.

Your personal data **will not be transferred** to third countries or international organisations **unless** you have given your explicit prior consent (e.g. to authorise access of NCP established in third countries or use of third party tools).

Artificial Intelligence (AI) may be used to facilitate the processing of data submitted. However the use of AI will **not lead to automated decision-making**, as **all decisions are made by natural persons**.

How long do we keep your personal data?

Your personal data will be kept for the maximum periods set out below, at the end of which the data may be kept for archiving in the public interest, scientific or historical research or statistical purposes or will be deleted. Your personal information is kept only as long as necessary for the purposes for which it was collected or to comply with the legal obligation, including reporting, archiving in the public interest, scientific or historical research or statistical purposes.

- The personal data of selected EIC experts such as **Business Coaches, Evaluators or Jury members** will be kept for **7 years** after the end of the relevant programme.
- If you are **not yet selected as EIC expert or coach**, your personal data is kept for the duration of the EIC programme.
- In case EIC applicants are **invited to a Jury Interview**, the date of birth, Passport/ID number, contract of employment, most recent salary slip specifically submitted for the interview will only

¹⁷ All contractors working for the European Institutions and the EIC Fund have signed non-disclosure agreements.

be kept for maximum **6 months** from the last day of the week in which the interview took place. Data will be automatically deleted at the end of this period.

- Personal data of **funded EIC Accelerator applications** are retained for **10 years** after the end of the year following closure of the Horizon Europe / EIC programme.

Pursuant to Article 4(1)(e) of the Regulation (EU) 2018/1725, and subject to the implementation of appropriate safeguards in accordance with Article 13, we may retain limited categories of personal data of beneficiaries for scientific research and/or statistical purposes for up to 25 years, unless you exercise your right to object under Article 23 of the Regulation;

- If **your application is not successful or withdrawn**, your personal data are retained for up to **5 years** after the closure of the evaluation process for which the data have been collected or updated. We may retain limited categories of personal data of unsuccessful applicants for scientific research and/or statistical purposes for up to 25 years, unless you exercise your right to object under Article 23 of the Regulation.

How do we protect and safeguard your data?

All data in electronic format (e-mails, documents, uploaded batches of data etc.) are stored either on the servers of the European Commission, the Agency or of its contractors.

All processing activities are carried out pursuant to the Commission Decision (EU, Euratom) 2017/46 of 10 January 2017 on the security of communication and information systems in the European Commission.

The Agency's or Commission's contractors are bound by specific contractual clauses and confidentiality clauses for processing of your data on behalf of the joint controllers, and subject to obligations deriving from Regulation (EU) 2018/1725 and the General Data Protection Regulation ('GDPR' Regulation (EU) 2016/679).

In order to protect your personal data, the joint controllers have put in place a number of technical and organisational measures. This includes appropriate actions to address online security, risk of data loss, alteration of data or unauthorised access, taking into consideration the risk presented by the processing and the nature of the personal data being processed. In addition, access to the personal data are restricted solely to authorised persons with a legitimate need to know for the purposes of each processing operation.

Access to the EIC IT platforms is secured, via the EU Login authentication service and role-based authorisation mechanisms.

All stakeholders involved in the evaluation, selection and contracting process are bound by their contractual arrangements to use the personal data received only for the purposes for which they were transmitted and to not further process any irrelevant and excessive data received with the proposals.

What are your rights related to the protection of your personal data?

You have the right to access your personal data and to request your personal data to be rectified, if the data is inaccurate or incomplete; where applicable, you have the right to request restriction or, to request a copy or erasure of your personal data held by the data controller. You have the right to object to processing on grounds relating to your particular situation, unless the controller demonstrates compelling legitimate overriding grounds. If processing is based on your consent, you have the right to withdraw your consent at any time, without affecting the lawfulness of the processing based on your consent before its withdrawal.

Your rights to information, access, rectification, erasure, restriction or objection to processing, communication of a personal data breach or confidentiality of electronic communications may be restricted only under certain specific conditions as set out in the in accordance with Article 25 of Regulation (EU) 2018/1725.

Your request to exercise one of the above rights will be dealt with without undue delay and within **one month**.

If you have **any queries** concerning the processing of your personal data, you may address them to as the competent data controller as specified above.

You can ask the data controller to remove your account by sending a message to EISMEA-SME-HELPDESK@ec.europa.eu.

In addition, you can access, check, modify, update or request the deletion of your personal data at any time and for further information on the processing of your personal data you can contact the EIC programme services team at by sending a message to EISMEA-SME-HELPDESK@ec.europa.eu.

You have the right of recourse at any time to the EISMEA-DPO@ec.europa.eu and DPO of EIC Fund and to the European Data Protection Supervisor at <https://edps.europa.eu>.

Additional information for the EIC IT platform

Site activity logging (Log files)

EIC IT Platform stores the following information on its server:

- The firewall keeps track of the network traffic, information like user's IP address are recorded;
- The standard log facility on the Internet Information Server (web server) is on, and collects the usual information including browser type, Internet Service Provider (ISP), date and time stamp, referring/exit pages and other relevant information enabling EISMEA to improve the user experience and identify attempts of inappropriate use of the EIC IT platform.

The EIC IT Platform logging capabilities are complemented by the dedicated analytics tool [Matomo](#).

The purpose of the information is for analysing trends, administering the site, tracking users' movement on the website, and gathering geographical information.

In the context of auditing of the EIC IT platform, personally identifiable information might be collected to ensure the security and the integrity of the system and prevent any inappropriate use of the platform.

1. Cookies

EIC IT Platform uses 'cookies' necessary to store information such as visitors' preferences and website pages accessed. This information is used to optimise the users' experience.

2. What are cookies?

A cookie is a small text file that a website saves on your computer or mobile device when you visit the site. It enables the website to remember your actions and preferences (such as login, language, and font size and other display preferences) over a period of time, so you don't have to keep re-entering them whenever you come back to the site or browse from one page to another.

3. How do we use cookies?

A number of our pages use cookies to store your display preferences, such as contrast colour settings or font size and non-identifiable data such as browsing behaviour within a session to improve the service.

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that some features of this site may not work as intended.

4. How to control cookies

You can **control and/or delete** cookies as you wish – for details, see aboutcookies.org. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being installed. Please note that in such a case some services and functionalities may not work as designed.

The system uses session cookies in order to ensure communication between the browser and the server. Therefore, the browser should be configured to accept cookies and they are discarded once the browser session is terminated.

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