

Controller:	Innovative Medicines Initiative 2 Joint Undertaking ("IMI2 JU")
Address:	White Atrium Building, Avenue de la Toison d'Or 56-60, 1060 Brussels, Belgium
DPO:	data-protection@imi.europa.eu

Ref.	Name of processing operation	Purpose of the processing	Responsible Unit	Data subjects categories	Data categories processed	Legal basis (general and specific)	Processor(s) / Joint controller(s)	Recipients of the data (Internal or external)	Retention period	Technical and Organisational Measures
PO 1 Human Resources										
PO-1-01	Selection and recruitment of staff (temporary agents, contract agents, seconded national experts, interims staff and trainees)	Receiving and processing applications following publication of vacancy notice via the online recruitment tool	Human Resources	Candidates sending their application using the online recruitment tool; Trainees recruited by the EC; Interim staff selected via an external contractor on behalf of the EC	Identity information, date of birth, gender, contact details, education, professional details, language skills, IT skills, any other information that the candidate provides the IMI2 JU with, and data regarding criminal records. In the context of selection and recruitment, the IMI2 JU does not intend to process personal data concerning health. The EC Medical Service sends a document to the IMI2 JU indicating whether the applicant is physically fit to perform the job, but the medical data are kept by the Medical Service.	Public interest and performance of contract (Article 5.1(a),(c) Regulation (EU) 2018/1725); The Conditions of Employment of other servants of the European Communities (CEOS), in particular art. 2(a) and (f), 3(a), 12-15, 82-84 and 86; Commission Decisions implementing Staff Regulations and CEOS. Service Level Agreements signed between the IMI2 JU and the EC and the PMO Special categories: possibly explicit consent art. 10.2(a) or art. 11 Regulation (EU) 2018/1725, in particular art. 137.3 of the EU Financial Regulation (for criminal records)	Joint controller: European Commission, in particular the DG Human Resources and Security, the Office for Administration and Payment of Individual Entitlement (PMO) ad DG EAC; Processors: service provider online recruitment tool, interim work agency	HR unit; Members of selection panels	As long as needed to fulfill the purpose. Criminal record certificates are returned immediately after the selection process. After a successful application, this personal data becomes part of the personnel file and will be kept accordingly. If the candidate is not recruited, the personal data are kept for 2 years after expiry of the list.	Consent is recorded and logged via the online recruitment tool; Access on a need-to-know basis; Members of the panel sign a confidentiality declaration. Any health data are stored in a secured IT database (Joint Sickness Insurance Scheme) managed by the PMO. The HR officer process them in accordance with the principles of medical confidentiality.
PO-1-02	Personnel files	Processing of staff data for employment contract, setting up rights, complaints, appraisal, career development, contract termination	Human Resources	IMI2 JU staff: temporary staff, contractual staff, interimaies, END	Identity information, contact details, family situation, address, certificates (marriage/divorce, birth, children...), diploma, work certificates, pension rights, complaints cases, termination of employment, declarations, etc.	Public interest (Article 5.1(a) Regulation (EU) 2018/1725; Art. 12.2(d) and 82.3(d) CEOS Service Level Agreements signed between the IMI2 JU and the EC and the PMO	Joint controller: European Commission, in particular the DG Human Resources and Security (Medical service)	HR unit; PMO	Paper files are kept for a maximum of 5 years from the moment of recruitment; The digital file is kept for as long as needed to fulfill the purpose and at least during the period of employment and 10 years after the extinction of all rights of the staff member concerned and of any dependents	Access on a need-to-know basis. All HR files are stored in a restricted access HR drive. Paper files are kept in a locked cupboard which is only accessible by HR staff.
PO-1-03	Evaluation of staff	Managing performance of staff with regard to the job description and objectives	Human Resources	IMI2 JU staff: temporary staff, contractual staff	Contact details, professional details, language skills, IT skills, description of tasks, any information for the evaluation of the staff member. In the framework of the probation procedure, data concerning health may be processed, namely in case of its extension due to a maternity and/or sick leave as provided for in Article 34(1) of the Staff Regulations. The analysis of those documents are carried out on a case by case basis so that only relevant data are processed in the light of the Staff Regulation's requirements.	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Art. 34, 43, 45-46 EU Staff Regulations; Art. 14, 81, 84, and 87 CEOS. Special categories: art. 10.2(b) and art. 11 Regulation (EU) 2018/1725, in particular art. 137.3 of the EU Financial Regulation	/	HR unit; PMO	As long as needed to fulfill the purpose and maximum 10 years after termination of employment or the last pension payment.	Access on a need-to-know basis

PO-1-04	Leaves	Processing of all kinds of leave and assessing the entitlement to such leave, such as annual and special leave, maternity leave, leave on personal grounds, parental leave	Human Resources	IMI2 JU staff: temporary staff, contractual staff	Information and requests regarding annual leave, special leaves (maternity, sick leave, personal grounds, medical consultation,...)	Public interest (Article 5.1(a) Regulation (EU) 2018/1725; Art. 57-60 EU Staff Regulations; Art. 11, 16, 18, 58, 91 CEOS; Service Level Agreements signed between the IMI2 JU and the EC and the PMO	Joint controller: European Commission, in particular the DG Human Resources and Security (Medical service)	HR unit; PMO	Depends on the kind of leave. 3 years for administrative data ; For family leave and leave on personal grounds: entire career of the staff to keep track when the total time granted reaches the maximum permitted. Certain leaves as in the context of credit-time, the retention period is 7 years at most. Data related to financial compensation related to leave (e.g. payment of leave not taken on termination of service and compensated as time-off) are retained for 7 years at most; Personal data in supporting documents should be deleted as soon as they are not necessary for budgetary discharge, control and audit purposes.	The IMI2 JU does not record more details than necessary. Access on a need-to-know basis; Paper files are destroyed in a secure way.
PO-1-05	Salary	Processing of any information related to the salary and to determine the staff member's entitlements, such as salary slips and allowances	Human Resources	IMI2 JU staff: temporary staff, contractual staff, interimaire, END	Grade, family situation, age, bank account	Public interest (Article 5.1(a) Regulation (EU) 2018/1725; Art. 62-70 EU Staff Regulation; Service Level Agreements signed between the JU and the EC and the PMO	Joint controller: EC Office for Administration and Payment of individual entitlements (PMO). Processor: EC medical service	HR unit, Finance unit, PMO	As long as needed to fulfill the purpose but no longer than 10 years after the extinction of all rights	Access on a need-to-know basis
PO-1-06	Missions	Managing the missions of the staff and reimbursement of travel costs	Human Resources	IMI2 JU staff: temporary staff, contractual staff	Contact details and meeting documentation, request form, grade, status, credit card details, ID/passport details, mobile phone for emergencies	Public interest (Article 5.1(a) Regulation (EU) 2018/1725; Art. 11-13 EU Staff Regulation	Joint controller: European Commission, in particular the DG Human Resources and Security (Medical service) Processor: travel agency	Secretariat; Finance unit, Travel agency	As long as needed to fulfill the purpose but no longer than 7 years after termination of all delays for appeal and/or budget discharge	Access on a need-to-know basis; Credit card details are kept in a secure manner and pseudonymised
PO-1-08	Occupational health and medical data	Management of health data in the workplace and pre-recruitment, annual or periodic medical examination	Human Resources	JU staff: temporary staff, contractual staff	Identification data of the staff member, of relatives, reports on health but no information is provided about the diagnosis nor about the content	Public interest (Article 5.1(a) Regulation (EU) 2018/1725); Art. 10.2(b) Regulation (EU) 2018/1725; Art. 28, 33, 59(1) of the Staff Regulations, art. 12(d), 13(2) and 83(2) of CEOS	Joint controller: European Commission, in particular the DG Human Resources and Security, the Office for Administration and Payment of Individual Entitlement (PMO); Processors: EC external service providers	HR unit, PMO, medical service	As long as needed to fulfill the purpose. The JU does not collect medical certificates of staff members (directly sent to the medical service of the European Commission). Pre-recruitment aptitude certificates are kept in the personal files for a maximum period of 10 years after the end of the period during which the staff member is in active employment or the last pension payment. Maximum retention period for administrative health data is 3 years except if a dispute and appeal is underway; Maximum retention period for medical data of non-recruited candidates is the period for challenging the data.	Access on a need-to-know basis
PO-1-09	Telephony (fixed and mobile)	Invoicing of professional and personal communications	Human Resources	JU staff: temporary staff, contractual staff	Numbers received/dialed, duration of communications, price	Public interest (Article 5.1(a) Regulation (EU) 2018/1725); Council Regulation 557/2014	/	Identified JU HR and financial unit staff, ECAS	As long as needed to fulfill the purpose	Access on a need-to-know basis.

PO 2 Beneficiaries

PO-2-01	Management of public procurement procedures and grant agreements	Organisation of public procurement/prizes/grants, selection of tenderers, nomination in committees, declarations of COI, management of contract; Management of projects participants; Keeping a database of submitted proposals including contact persons references) and proposals (the proposals contain descriptions of the persons involved)	Administration and Finance, Operations	Applicants/tenderers to public procurement procedures organised by the JU and/or common to other Jus; Members of projects/consortia	Identity information, contact details, professional experience, education, bank details, financial information In the framework of EDES or the detection of fraud related to the contract or procedures relating to sanctions according to art. 136(3) Financial Regulation, but these extracts are not kept longer than 2 years after the accomplishment of the particular procedure.	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes; Articles 135-142 and art. 167(2) and point 20 of Annex 1 of the Financial Regulation. Regulation 1290/2013 (H2020 rules of participation) IMI2 GB 2015.44, article 33 (IMI2 Financial Rules)	Joint controller: the EC and the Research Executive Agency for the management of grant applications and the EC for the management of procurement procedures Processor: external service providers under direct or framework service procurement contracts; experts such as individual expert evaluators and reviewers; the EC	JU financial and admin staff, Project Officers and assistants, finance and legal staff, members of selection panel, ECA, OLAF; EC and its services; contractors	As long as needed to fulfill the purpose. Files of successful tenderers and grant applications are kept for 10 years after the end of the contract or closing of the action. If unsuccessful, the personal data is may be kept up to 5 years after closure of the procedure to allow for all possible appeals.	Access on a need-to-know basis and confidentiality obligations. Technical measures such as access rights and access control.
PO-2-02	List of contracts/contractors and SLAs	List the contactors and companies/organisations the JU contracts with	Administration and Finance	list of contactors and SLAs signatories	Identity information, contact details, company	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) IMI2 GB 2015.44, article 33 (IMI2 Financial Rules)	/	JU financial and admin staff, members of selection panel, ECA, OLAF	As long as needed to fulfill the purpose and at least 10 years after the end of the contract.	Access on a need-to-know basis.
PO-2-03	Selection and management of experts database	Collection, processing and management of a database of experts for participation in evaluations, reviews, Appointment Letters	Operations	External experts and interested persons	Identity information, contact details, professional experience, education Information provided by the expert may lead to an entry in the EDES managed by the EC (art. 136 FR)	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes; Art. 237 Financial Regulation Regulation 1290/2013 and 1291/2013 (H2020 rules of participation); JU Financial Rules	Controller: online registration of experts managed by Research Executive Agency (REA) acting as a controller via the H2020 Participant Portal and locally by each controller Processor: external experts (contractors)	POs, assistants to POs	As long as needed to fulfill the purpose. Files of selected experts are kept for 10 years after the end of the contract. Files of non-selected experts might be kept for up to 5 years after the closure of the procedure to allow for all possible appeals.	Access on a need-to-know basis and confidentiality obligations.
PO 3 Administration, Finance and Audit										
PO-3-01	Database of project beneficiaries	Follow up and payment of project beneficiaries	Administration and Finance	Project beneficiaries from all projects	Identity information, contact details, bank details	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes	/	Projects Officers, JU financial staff, IMI2 management	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-3-02	External audits	Control of grant agreement or service contracts. Preparing and communicating audit reports by the external auditor.	Administration and Finance	JU staff, external contractors (procurements and grants), experts, candidates applying to vacancies	Identity information, contact details, function, financial information, professional information, CVs, documents produced or signed by data subjects, meeting minutes	Public interest and legal obligation (Article 5.1(a)-(b) Regulation (EU) 2018/1725) Council Regulation 557/2014, art.14; IMI2 GB 2015.44 (Financial Rules); Art. 254-259 Financial Regulation; Art. 29 of Regulation 1291/2013	External auditor.	Projects Officers, JU financial staff, IMI2 management	Files related to audits carried out are kept for 7 years.	Access on a need-to-know basis and confidentiality obligations. Correspondence with auditees are stored in the Commission's document management system Ares. IT systems are hosted in the Commission's data center and operated by DG DIGIT.
PO-3-03	Internal audits (IAS, ECA)	Audit procedures to check the regularity of the transactions and the quality of financial management of the JU	Administration and Finance	JU staff, external contractors (procurements and grants), experts, candidates applying to vacancies	Identity information, contact details, function, financial information, professional information, CVs, documents produced or signed by data subjects, meeting minutes	Public interest and legal obligation (Article 5.1(a)-(b) Regulation (EU) 2018/1725) Council Regulation 557/2014, art.14; IMI2 GB 2015.44, article 33 (IMI2 Financial Rules); Art. 71 Financial Regulation	The Internal Audit Service of the European Commission acting on behalf of the Internal Auditor and performing the function of internal auditor of the JU; DG DIGIT (audit management tool)	IAC, IMI2 management, Court of Auditors, IAS, OLAF	Files related to audits carried out are kept for 7 years.	Access on a need-to-know basis and confidentiality obligations. Correspondence with auditees are stored in the Commission's document management system Ares. IT systems are hosted in the Commission's data center and operated by DG DIGIT.
PO-3-04	Financial transparency	Publication of recipients of JU funding	Administration and Finance	Recipients of JU funding procurement and grants)	Identity information, company, function, country, project/contract, amount received from the JU	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Regulation 966/2012 (Financial Rules applicable to the general budget), art.35	/	General public: data are published on the JU website	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-3-05	List of financial contacts in NFAs	Contacting the persons in the national administrations in charge of paying beneficiaries and issuing certificates to the JU	Administration and Finance	Project beneficiaires receiving funding from the JU	Identity information and contact details	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes	/	JU staff	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-3-06	Contact list of Boards members	Invitation to PAB/GB meetings, participation in GB/PAB written procedures, granting access to CircaBC, access to Calls information	Administration and Finance	Members of PA, PMB, EC nominated by their respective administration/industry association	Identity information, contact details (phone, address, email), function	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes	/	Secretary of the Boards, Calls manager, IMI2 management	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-3-07	Declarations on conflict of interests and confidentiality	Granting access to PA members to outcome of Calls for Proposals	Administration and Finance	PAB and GB representatives	Identity information, contact details (phone, address, email), function; identified conflicts of interest (link with recipient)	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes	/	Secretary of the Boards, Calls manager, IMI2 management	As long as needed to fulfill the purpose	Access on a need-to-know basis

PO-3-08	Administrative agreements with national funding authorities	Managing the AA, granting rights to national representatives	Administration and Finance	Representatives of PA	Identity information, contact details, function	Public interest (Article 5.1(a) Regulation (EU) 2018/1725 Council Regulation 557/2014 and the annexed Statutes	/	Secretary of the Boards, Calls manager, IMI2 management	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-3-09	Anti-fraud procedures	Adopting and implementing measures needed to facilitate internal investigations conducted by OLAF	Administration and Finance	Persons subject to an OLAF investigation and persons that provided information to OLAF; Persons whose name is mentioned in the files	Identity information, contact details, function, professional information, case-specific information	Public interest and legal obligation (Article 5.1(a)-(b) Regulation (EU) 2018/1725); Art. 287 and 325 TFEU Council Regulation 557/2014 and the annexed Statutes; Art. 30 of Regulation 1291/2013; Council Regulation No 2185/96 of 11 November 1996; JU Anti-fraud Strategy	External contractors (experts or advice); OLAF	JU Staff dealing with these cases; possibly also OLAF	Files concerning fraud are kept for 5 years.	Access on a need-to-know basis and measures adopted by OLAF
PO-3-10	Whistleblowing procedures	Adopting and implementing measures needed to facilitate whistleblowing	Administration and Finance	JU staff	Identity information, contact details, function, professional information, case-specific information	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes; Art. 30 of Regulation 1291/2013; Council Regulation No 2185/96 of 11 November 1997; Art. 22a-22b EU Staff Regulations; Art. 11 and 81 CEOS JU Anti-fraud Strategy	External contractors (experts or advice)	JU Staff dealing with these cases; Possibly also OLAF, EDPS DPO, IAS, Court of Auditors and Court of Justice, the whistleblower, external contractors	As long as needed to fulfill the purpose. Depends also on the information in the reports.	Access on a need-to-know basis
PO-3-11	Anti-harassment procedures	Adopting and implementing measures for anti-harassment	Administration and Finance	JU staff	Identity information, contact details, function, professional information, case-specific information which can be subjective (allegations, declarations based on opinions, etc.). Special categories of personal data may be processed if absolutely necessary.	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes; Art. 12a and 24 EU Staff Regulations	External contractors (experts or advice)	JU Staff dealing with these cases; Possibly also OLAF, EDPS DPO, IAS, Court of Auditors and Court of Justice, the whistleblower, external contractors or confidential counsellors	As long as needed to fulfill the purpose and maximum 3 months after closure of the case. Other recipients might keep the data longer under their responsibility.	Access on a need-to-know basis and confidentiality obligations.
PO-3-12	Policy on sensitive functions	Collection of personal data for management of sensitive posts and assessment	Administration and Finance	JU staff	Identity information, contact details, function, professional information, case-specific information	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 2988/95 of 18 December 1995 (in particular art. 1(2)); Regulation (EU) 1291/2013 (in particular art. 30) Council Regulation 557/2014 and the annexed Statutes; JU Policy on sensitive functions	External contractors (experts or advice)	JU Staff dealing with these cases; DG HR in exceptional cases	As long as needed to fulfill the purpose and confidentiality obligations	Access on a need-to-know basis
PO 4 Communication										
PO-4-01	Mailing list	Keeping a list of email addresses for the newsletter ant to inform about JU activities	Communication	Recipients having requested or consented to receive emails from the JU	Identity information, contact details, professional details.	Consent and public interest (Article 5.1(a)-(d) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes, in particular art. 1(i), (j) and (l). JU Communication Strategy	Processor: external service provider to send newsletters (Mailchimp)	Communication team of the JU	As long as needed to fulfill the purpose or until subscriber withdraws consent	Technical measures to secure the personal data of the recipients. The Mailchimp account is only accessible on a need-to-know basis.
PO-4-02	Organisation of events and registration	Registering the attendance at and management of meetings or events organised by the JU; Follow-up and dissemination of those events. The EU Survey Tool for event registration might be used.	Communications and Institutional Relations	persons registered in events	Identity information, contact details, company, professional details such as business cards, photos, dietary requirements	Consent and public interest (Article 5.1(a)-(d) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes, in particular art. 1(i) and (l). JU Communication Strategy Dietary requirements: manifestly made public by the data subject (art. 10 §2 Regulation 2018/1725)	DG DIGIT of the EC as manager of the application EUSurvey if applicable. Processor: external service provider for marketing services	Communication team of the JU	As long as needed to fulfill the purpose and up to 5 years after the end of the event or until consent is withdrawn.	Access on a need-to-know basis
PO 5 IT										
PO-5-01	Management of IT infrastructure	Management of user authentication, access to IT systems to perform statutory duties, authorisations, and providign of help in case of IT problems	Administration and Finance	JU staff and any person granted access to the network	Identity information, user authentication information, data in users directories, data in log files	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes;	Joint controller: EC (DG Informatics) Processor: external IT service providers	JU staff including IT systems administrator, network and security managers, EC services (i.e. EC e-mail address book) and external IT service provider in some cases	As long as needed to fulfill the purpose. Network access data (username and password) is kept for the duration of employment and deleted 1 month after termination. ABAC and ECAS retention policies also apply	Access on a need-to-know basis and confidentiality obligations.

PO-5-02	Document management	Repository and filling of documents received and sent out from and to external individuals as well as internal exchanges	Administration and Finance	Any person making use of the document repository, in particular JU staff and correspondents	Name, address, subject field, related project/contract	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes; Commission Decision 2002/44/EC, ECSC, Euratom of 23 January 2002 amending its Rules of Procedure on the provisions on document management; Commission Decision 2004/563/EC, Euratom of 7 July 2004 amending its Rules of Procedure on the Commission's provisions on electronic and digitised documents; JU Document management policy	Joint controller: EC (DG Informatics) Processor: external IT service providers	JU staff and any correspondents; DG DG Informatics, possibly also Auditors, OLAF, Commissions's Investigation and Disciplinary Office (IDOC)	As long as needed to fulfill the purpose.	Documents are stored electronically on the JU server in a specific folder. Access rights for JU staff and access controls
PO 6 Institutional / Governance										
PO-6-01	Access Badges	Granting access with badges to the building and parking	Administration and Finance	JU staff; JU visitors	Identification information, badge number	Public interest (Article 5.1(a) Regulation (EU) 2018/1725) Council Regulation 557/2014 and the annexed Statutes	External contractor (Securitas)	JU security staff and staff of external contractor	As long as needed to fulfill the purpose	Access on a need-to-know basis
PO-6-02	Access to documents	Receiving, processing and assessing requests to access documents of the JU.	Administration and Finance	Any person requesting access to a document of the JU.	Identification information, contact details, information included in the official request form, any other information provided to the JU	Public interest and legal obligation (Article 5.1(a)-(b) Regulation (EU) 2018/1725) Council Regulation 557/2014 (in particular art. 16) and the annexed Statutes	External service provider	JU staff dealing with these requests; possibly also the external service provider	The data are kept up to 5 years after the closure of the procedure	Access on a need-to-know basis and appropriate access rights and control.