

Erasmus for Young Entrepreneurs IT Management Tool

1. The 'Erasmus for Young Entrepreneurs' Application

The Erasmus IT Management Tool aims to support the process of the Erasmus for Young Entrepreneurs Programme. It stores information about all involved parties and assists in the matching and relationship¹ building process between host and new entrepreneurs. For more detailed information on the functioning of the Programme please see www.erasmus-entrepreneurs.eu.

The IT Management Tool offers the following features:

- Secure authentication through the European Commission Authentication System (ECAS)
- Processing, follow-up and assessment of entrepreneurs' applications;
- Search and matching function to facilitate the searching process in the catalogue of entrepreneurs accepted to take part in the Programme;
- Follow-up with regard to relationship building and execution activities (electronic communication, electronic approval, etc.);
- Management of administrative data related to Intermediary Organisations in charge of running the Programme throughout the Member States and other participating countries (COSME countries);
- Uploading of new entrepreneurs' business plans which could contain IPR related information. However, access is strictly limited to Commission staff, Executive Agency for Small and Medium Enterprises (EASME), the Support Office staff and the staff of the Intermediary Organisation and Lead Intermediary Organisation to which the entrepreneur is linked;
- Uploading of CVs containing personal data. Access is allowed to counterpart entrepreneurs accepted to participate in the Programme, Intermediary Organisations' staff, Support Office staff and Commission and EASME staff.

2. WHAT PERSONAL INFORMATION DO WE COLLECT, FOR WHAT PURPOSE AND THROUGH WHICH TECHNICAL MEANS?

2.1. Identification Data

- Data aiming to identify the data subject: title, function, first and last name, date of birth (for new entrepreneurs only) , email, address, phone/fax numbers;
- Data aiming to identify the technical and professional profile of the entrepreneur (including his CV and Business Plan);
- Data falling under article 10, paragraph 2 b) could be voluntary registered by the entrepreneur, such an obvious disability, leading to specific management of the person's registration to the Erasmus Programme.

¹ The term "relationship" describes exchange (mobility) between host and new entrepreneur within this programme.

2.2. Purpose

The purpose of the deployment of this IT Management Tool is to enable the European-wide roll-out of Erasmus for Young Entrepreneurs Programme. The IT Tool aims to support the process of the Programme, particularly the registration, the selection and matching of the new and host entrepreneurs (see www.erasmus-entrepreneurs.eu for more information). Furthermore, it is used to collect, store and treat information about all involved parties in order to enable the Support Office and DG GROW and EASME to manage the Programme – including payments and audits – and to extract data for statistics on the progress and status of each registered entrepreneur and each relationship that has been initiated or is in progress. On a local level the Programme is run by Intermediary Organisations which have been awarded a grant by the Commission or EASME.

2.3. Legal Base

The process is lawful, because it uses the necessary data to achieve the purpose as described in point 2.2 and to comply with the requirements of the Community law, mainly:

- Article 173 of the Treaty on the Functioning of the European Union
- Small Business Act (SBA) Action Plan 2008, in particular Principle n°1 ("Create an environment in which entrepreneurs and family businesses can thrive and entrepreneurship is rewarded"), third action – which commits the Commission to launch the process
- Decision No 1639/2006/EC of the European Parliament and of the Council of 24 October 2006 establishing a Competitiveness and Innovation Framework Programme 2007-2013
- Decision No 1287/2013 of the European Parliament and of the Council of 11 December 2013 establishing a Programme for the Competitiveness of Enterprises and small and medium-sized enterprises (2014-2020).

An independent study done by ECOTEC Research and Consulting Ltd. describes the implementation of the action and justifies the process of data as described.

2.4. Technical information

The data is stored on database servers in the data centre of DIGIT in Luxemburg.

3. WHO HAS ACCESS TO YOUR INFORMATION AND TO WHO IS IT DISCLOSED?

- Staff of Intermediary Organisations in charge of running the Programme
- Support Office staff
- Authorised staff of the European Commission and the Executive Agency for Small and Medium Enterprises
- Entrepreneurs having been accepted to the Programme and thus having access to the IT Management Tool.

4. HOW DO WE PROTECT AND SAFEGUARD YOUR INFORMATION?

The information is protected by the generic measures concerning e-security throughout the Commission.

5. HOW CAN YOU VERIFY, MODIFY OR DELETE YOUR INFORMATION?

5.1. Verification and Modification of Data

As regards the verification and modification of data during the registration process – i.e. if an HE's or NE's application has not yet been accepted – entrepreneurs can always return to the online registration form to update their details as necessary and also contact the IO chosen during the registration process to exert this right.

When the registration process is completed, entrepreneurs are granted access to the IT Management Tool, where they can consult their personal data. If they want to change their personal data or their business plan and CV, they have to contact their respective Intermediary Organisation to do so.

Once entrepreneurs are involved in a relationship (i.e. from the 'Ready for Approval' status onwards), the Programme rules do not allow IOs to update the profiles in terms of content (CV, motivation to participate in the programme) but other personal data (such as address, phone number) can still be changed. These changes are usually undertaken by the Support Office as the IOs are not meant to modify data of entrepreneurs in relationship status.

Data from IO staff can be modified via the Lead Intermediary Organisation (i.e. the IO heading a consortium of Intermediary Organisations).

Complaints, in case of conflict, can be addressed to the European Data Protection Supervisor (<http://www.edps.europa.eu>).

5.2. Deletion of Data

Entrepreneurs can request the deletion of their data:

- For entrepreneurs who have only registered in the system but who have never been accepted, the full record will be deleted from the database.
- For entrepreneurs who have been accepted but who have never entered into a relationship/ exchange personal data will be made anonymous (as general information has to be kept for statistical purposes).
- Some data (name and surname, date of birth, email address) from entrepreneurs who have participated in a relationship cannot be made anonymous. The rest of the data will be kept until the audit period for the respective grant agreement is finished. In total this period would amount up to 10 years (this period includes duration of grants (2 years), subsequent reporting and payment period (up to 3 years) and audit period (5 years after the final payment)).

It should be noted that the personal data of entrepreneurs who are in 'Back to Applicant' status and who were previously accepted will be made anonymous automatically after 12 months after the last log in. If entrepreneurs were never accepted, their data will be deleted after the same time period. Data from new entrepreneurs who were accepted to participate and who no

longer fulfil the criteria of participation in the Programme will be equally made anonymous. Please also refer to point 6.

Staff of Intermediary Organisations can equally request the deletion of their data however the auditing period (6 years) has to be respected (see point 6).

The controller will deal with the data subjects request under articles 13-18 regulation 45/2001 within 3 months.

6. HOW LONG DO WE KEEP YOUR DATA

Entrepreneurs:

- Generally, data of entrepreneurs will only be completely erased if they have never been accepted to participate in the Programme – this will happen 12 months after the last activity in the Tool.
- If entrepreneurs were accepted but they have been in status 'Back to Applicant', their data will be made anonymous 12 months after the last log in. If they were never accepted, their data will be erased after the same time period.
- If new entrepreneurs have participated in a relationship their data (name and surname, date of birth, email address) will be kept for verification purposes as participation in the programme is limited to single case.
- If host entrepreneurs have participated in a relationship and do not want to participate in further relationships, their data will be kept for 10 years and it will then be made anonymous. Please see also point 5.2 in this regard. This delay is proportionate given the audit requirements
- No data will be deleted as long as entrepreneurs are accepted and fully active in the IT Management Tool; whilst data of withdrawn entrepreneurs (i.e. entrepreneurs who have withdrawn from the Tool) will be made anonymous after 6 months.
- Data of new entrepreneurs – who have not yet participated in a relationship – will be made anonymous once they do no longer fulfil the criteria for participation.

Staff of Intermediary Organisations:

Data pertaining to staff of Intermediary Organisations cannot be deleted until the audit period for the grant agreement of the respective Intermediary Organisation has passed. This period would amount to 12 months (period for reporting and payment of the respective Intermediary Organisation) + 5 years (maximum audit period) – i.e. 6 years after the contract of the Intermediary Organisation has finished. There is no need to make the data anonymous as it is not relevant for statistical purposes.

7. CONTACT INFORMATION

In Unit GROW/H/2, the Controller is Mr. Giacomo Mattinò (Head of Unit) and the processor is Ms. Kateřina Nejdlová, Programme Officer.

The above persons can be reached under GROW-ERASMUS-TEAM@ec.europa.eu.