

AGRI-BIOCIRCULAR-HUB

Open Call – Financial Support to Third Parties (FSTP)

PRIVACY NOTICE

Document type	Public — to be published on agri-biocircular-hub.eu
Data Controller	FNG Invest SIA
Data Protection Officer	Ilona Gulcaka, ilona.gulchak@commercializationreacor.com
Effective date	21.05.2026
Version	1.0 – May 2026

Contents

1. Who we are
2. What data we collect and why
3. Who receives your data
4. International transfers
5. How long we keep your data
6. Your rights and how to exercise them
7. Complaints
8. Changes to this notice

This Privacy Notice explains how the AGRI-BIOCIRCULAR-HUB consortium collects and uses personal data submitted through the Open Call for Financial Support to Third Parties (FSTP). It applies to all applicants, contact persons, and team members named in proposals. It is provided under Articles 13 and 14 of the GDPR (EU) 2016/679.

Note

If you submit on behalf of an organisation and name other individuals in your application, please share this notice with those individuals.

1. Who we are

1.1 Data Controller

Legal name	FNG invest SIA
Address	7 Ernesta Birznieka-Upīša street, Jūrmala, LV-2010, Latvia
Registration No.	40103334402
Country	Latvia
Contact email	info@commercializationreactor.com

1.2 Data Protection Officer

Name	Ilona Gulcaka
Email	ilona.gulchak@commercializationreactor.com

The Open Call is submitted through F6s Network Limited (Ireland), acting as data processor in accordance with the terms of service: <https://www.f6s.com/terms>.

2. What data we collect and why

Data category	What we collect	Purpose and legal basis
Contact person data	Name, email, phone, role	Evaluation and contracting — Art. 6(1)(b) and (c) GDPR
Organisational data	Legal name, registration no., country, employee count, turnover	Eligibility verification — Art. 6(1)(b) and (c)
Proposal content	Project description, team members, budget, technical documents	Expert evaluation and selection — Art. 6(1)(b) and (c)
Ethics and compliance	SME declaration, Declaration of Honour, ethics checklist	Legal compliance — Art. 6(1)(c)
KYC and identity data	Proof of legal existence, bank details, ID of legal representatives	Contracting — Art. 6(1)(b). Selected applicants only.
Programme data	Progress reports, deliverables, event attendance	Programme monitoring — Art. 6(1)(b). Funded projects only.
Communications	Helpdesk emails, appeals	Operational management — Art. 6(1)(b) and (c)

Note on legal basis

The legal basis for processing application data is legal obligation and contractual necessity (GDPR Art. 6(1)(b) and (c)), not consent. The GDPR checkbox in the application form acknowledges this notice; it is not the legal basis for processing. Withdrawing the checkbox does not erase a submitted application.

3. Who receives your data

Recipient	What and why
AGRI-BIOCIRCULAR-HUB WP5 partners and designated evaluators	Application content for evaluation and contracting. Governed by the consortium agreement.
F6s Network Limited	All data submitted via the platform. Acts as data processor in accordance with the terms of service
European Research Executive Agency (REA)	List of selected projects and reporting data, as required by the Grant Agreement.
EU audit and oversight bodies	Any data requested in the context of a lawful audit or investigation.
National supervisory authorities	Data requested pursuant to a lawful legal order.

Publication

Names, project titles, and brief descriptions of selected projects will be published on the project website as required by Horizon Europe visibility rules. Selected applicants will be notified before publication.

4. International transfers

Data shared with consortium partners in Poland, Latvia, Spain, and Belgium is protected by the GDPR within the EU/EEA. Data shared with Ukrainian consortium partners (LPNU, IACR, DENR, AUDEL, LAC) is transferred under appropriate safeguards pursuant to GDPR Article 46, including standard contractual clauses incorporated into the consortium agreement. For details of safeguards or F6s sub-processor transfers, contact the DPO at ilona.gulchak@commercializationreactor.com.

5. How long we keep your data

All data is retained until five years after the date on which the final balance payment is made to the AGRI-BIOCIRCULAR-HUB consortium by the REA, or until the conclusion of any ongoing audit, investigation, or litigation — whichever is later. Based on the current project timeline, the balance payment is expected in late 2029, giving a retention period extending to approximately 2034. After expiry, all personal data is securely deleted or anonymised.

6. Your rights and how to exercise them

Under the GDPR you have the right to: access your personal data (Art. 15); request correction of inaccurate data (Art. 16); request erasure in certain circumstances (Art. 17 — limited during the mandatory retention period); request restriction of processing (Art. 18); receive your data in a portable format (Art. 20); and object to processing based on legitimate interests (Art. 21).

To exercise any right, contact:

Data Protection Officer	ilona.gulchak@commercializationreactor.com
Open Call helpdesk	agri-biocircular-hub-fstp@commercializationreactor.com

Subject line to use	GDPR Request — AGRI-BIOCIRCULAR-HUB Open Call
----------------------------	-----------------------------------------------

We will acknowledge within 5 working days and respond in full within 30 calendar days. Complex requests may take up to 90 days; you will be notified if this applies. No charge is made for exercising your rights.

Limitation on erasure

Application data processed under a legal obligation (the Grant Agreement and EU audit rules) cannot be deleted on request during the mandatory retention period. We will confirm in writing what we hold and why we cannot erase it.

7. Complaints

If you are not satisfied with how your data has been handled, you may lodge a complaint with your national data protection supervisory authority:

Country	Supervisory Authority	Website
Poland	Urząd Ochrony Danych Osobowych (UODO)	uodo.gov.pl
Latvia	Datu valsts inspekcija (DVI)	dvi.gov.lv
Ukraine	Commissioner for Human Rights of the Verkhovna Rada	ombudsman.gov.ua
Belgium	Autorité de protection des données (APD/GBA)	autoriteprotectiondonnees.be
Spain	Agencia Española de Protección de Datos (AEPD)	aepd.es
Ireland (F6s platform)	Data Protection Commission (DPC)	dataprotection.ie

We encourage you to contact us first, as most issues can be resolved directly.

8. Changes to this notice

We may update this notice to reflect changes in data practices or legal requirements. Any significant changes will be communicated by updating this page with a new effective date and, where changes affect already-submitted data, by email to registered applicants.

Version	Date	Summary of changes
1.0	[DATE]	Initial publication.