

Data Protection Information Notice

Version 2.0 – In force as of 17 March 2026

Processing of Personal Data Related to the User Calls Published by ELI ERIC

By issuing this present information notice, the purpose of ELI ERIC is to provide concise, clear and plain information to the data subjects about the processing of their personal data during the selection procedure of the proposals for experiments submitted to the User Calls announced by ELI ERIC, and – in the case of a successful proposal – during the preparation and performance of the selected user experiments.

The provisions and definitions set out in this Notice shall be interpreted in line with the Terms and Conditions of Access (hereinafter referred to as the 'TCA').

ELI ERIC is committed to ensuring the lawfulness, fairness and transparency of the processing of personal data. In accordance with this commitment, ELI ERIC implements appropriate technical and organizational measures in order to ensure the rights of Data Subjects and to secure their personal data, thereby preventing unauthorized access, alteration of or disclosure of such data.

ELI ERIC processes personal data in full compliance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter referred to as **GDPR**).

Users are required to comply with all applicable ELI ERIC policies and procedures regarding access to and use of ELI facilities and other resources.

Definitions used in this Notice correspond to those in Article 4 of the GDPR. In this Notice, the term '**Data Subject**' refers to the Principal investigators (PIs), and their experimental team members (hereinafter collectively referred to as '**Users**') who submit experimental proposals and conduct experiments within ELI User Calls. The PI is responsible for informing their team members and – when it is needed – obtaining their prior consent to the processing of their personal data.

Contact Information of the Controllers

I. Name: **Extreme Light Infrastructure European Research Infrastructure Consortium (ELI ERIC)**

- Director General: Allen Weeks
- Seat: Za Radnicí 835, Dolní Břežany, 252 41, Czech Republic
- E-mail address: info[[@](mailto:info@eli-laser.eu)]eli-laser.eu
- Data Protection Officer: dpo [[@](mailto:dpo@eli-laser.eu)]eli-laser.eu
- User Office: user-office@eli-laser.eu

II. Name: **ELI-HU Nonprofit Ltd. (Hosting organization of the ELI ALPS Facility)**

- Seat: H-6728 Szeged, Wolfgang Sandner street 3.
- E-mail address: info[[@](mailto:info@eli-alps.hu)]eli-alps.hu

III. Name: **Horia Hulubei National Institute for Research and Development in Physics and Nuclear Engineering (IFIN-HH) (Hosting organisation of the ELI-NP Facility)**

- Seat: No. 30, Reactorului Street, Magurele, 077125, Ilfov, Romania
- E-mail address: office.elinp[[@](mailto:office.elinp@eli-np.ro)]eli-np.ro

User Office: users[[@](mailto:users@eli-np.ro)]eli-np.ro

(Hereinafter collectively referred to as “Controllers”)

To comply with GDPR and ensure the safety of Users’ personal data of the Users, ELI ERIC and the Controllers have concluded Data Sharing Agreements, which may be requested in writing from the DPO of ELI ERIC.

General Principles

Where ELI ERIC processes personal data, or where ELI ERIC bases its processing activities on its legitimate interest, ELI ERIC processes the personal data of the Data Subjects until such time as the Data Subjects may withdraw their consent or object to the processing at any time, without affecting the lawfulness of the processing based on consent or on the legitimate interest prior to such withdrawal or objection. Withdrawal of consent or objection to the processing may result in the Data Subjects no longer being able to access the User Portal or participate in the selection procedure.

Documents generated in connection with the User Calls are processed electronically.

I. Users’ Access to the User Portal

To submit an experimental proposal for the User Calls announced by ELI ERIC for the first time, it is necessary to register in the User Portal operated by ELI ERIC. User Portal refers to the online platform available at up.eli-laser.eu as set out in the TCA.

Purpose of data processing: Identification of the Users, enabling the proper use of the User Portal and communication with the Users

Scope of the processed personal data: Name, surname, E-mail address

Legal basis of the processing: Consent given by the Data Subject (User) in accordance with the Article 6(1)(a) of the GDPR. The legitimate interest of the Controller in accordance with Article 6(1)(f) of the GDPR. The legitimate interest is the identification of the Users, enabling the proper use of the User Portal and communication with the Users.

Legal basis for the transmission and sharing of the personal data: Since the Users are invited to submit their proposals to all three ELI facilities (ALPS, Beamlines and NP), the personal data of the Users will be accessible to the designated staff of the Controllers strictly on a necessary basis in line with the Article 6(1)(f) of the GDPR.

II. Evaluation Procedure

When submitting the Experimental Proposal available on the User Portal, Users provide personal data. The technical and safety feasibility of the experimental proposals shall be assessed by the authorized staff of ELI facilities.

Peer review is conducted by external independent scientific experts in the relevant fields (ELI Peer Review Panel) with support from ELI staff in accordance with ELI ERIC Access Policy and the TCA.

The personal data of Users will be treated as confidential and will be accessible only to designated ELI staff and to those experts whose involvement is necessary in the evaluation process. ELI ERIC and the Controllers ensure that all persons with access to Users’ personal data are bound by confidentiality.

Purpose of the processing: To identify and contact the Data Subjects during the evaluation procedure

Scope of the processed personal data: Title, first name, surname, e-mail address, phone number, User ID, affiliation, country of affiliation, gender, career stage, citizenship, any other personal information which is included in the Experimental Proposal submitted by the Data Subjects

Legal basis for data processing: Consent given by the Data Subject in accordance with Article 6(1)(a) of the GDPR. The legitimate interest of the Controller in accordance with Article 6(1)(f) of the GDPR. The legitimate interest is the identification of the Data Subject for the purposes of assessment and evaluation of Experimental Proposals.

Legal basis for the transmission and sharing of personal data: Consent given by the Data Subject in accordance with Article 6(1)(a) of the GDPR and the legitimate interest of the Controller (evaluation of the experimental proposal and the assessment of its feasibility) in accordance with Article 6(1)(a) of the GDPR. The results of the balancing test may be requested upon a written request submitted to the DPO of ELI ERIC.

III. Personal Data During Implementation of Selected Experiments

During the implementation of the approved Experimental Proposal, ELI ERIC processes personal data of the Users as follows.

ELI facilities operate electronic surveillance systems on their premises for security purposes, as a result of which the image of the Data Subjects may be captured.

Furthermore, ELI facilities operate electronic access system (in particular electronic gates) and may engage security services. To ensure access to the premises, the Facilities may require the Users to provide certain personal data.

ELI facilities may have separate rules in place to ensure access to the laser equipment available at the Facilities and the Facilities may request additional personal data for their own special purposes. The particular Facility is responsible for these special regulations. If special regulations are applied that involve the processing of personal data for certain purposes, the Users will be informed prior to the processing by the Controllers.

Purpose of the processing: Purpose 1: To identify and contact the Data Subjects during the performance of the relevant experiment; purpose 2: to ensure access to the premises of the ELI facilities

Scope of the processed personal data: Purpose 1: Name, Surname, E-mail address, phone number, any other personal information which is necessary to perform the experiment; purpose 2: Name, Surname, place and date of birth, home address, passport or ID number, any other personal information relevant for logistical purposes.

Legal basis of the processing: Purpose 1: In case of winning experimental proposals, by accepting the GTC a contractual relationship is established between ELI ERIC and the Users. The legal basis for the processing of the Users' personal data is twofold:

- a) The legitimate interest of the Controller related to delivery of the relevant experiment in accordance with Article 6(1)(f) of the GDPR and
- b) The performance of the contract in accordance with Article 6(1)(b) of the GDPR.

Purpose 2: The legitimate interest of the Controller ensuring the entry into the premises of ELI facilities in accordance with Article 6(1)(f) of the GDPR. The result of the balance interest test may be requested upon a written request submitted to the DPO of ELI ERIC.

Legal basis for the transfer of personal data: The legitimate interest of the Controller in accordance with Article 6(1)(f) of the GDPR. Considering that the experiment takes place in one of the Facilities indicated in this Notice, it is necessary for the Controller to transfer the personal data of the Data Subject to the relevant facility on a need-to-know basis. The result of the balancing test may be requested upon a written request submitted to the DPO of ELI ERIC.

IV. Processing of Personal Data After the Experiment Implementation

After the implementation of the relevant experiment, ELI ERIC processes personal data of the Users as follows.

Purpose of the processing: As a general rule, ELI ERIC de-identifies or deletes the personal data of the Users when they are no longer necessary for the purposes described in the Notice or when the Users submit a request on deletion or objection. ELI ERIC informs the Data Subjects that their personal data cannot be de-identified, deleted or erased if a legal obligation exists that prevents ELI ERIC from doing so.

All personal data of the Users collected by ELI ERIC during the procedures and for the purposes described above will be stored for as long as necessary to achieve the purposes of the processing (or to enable communication with the Users).

ELI ERIC has a legitimate interest in maintaining archived records of communications. Such records may be useful if a User sends new questions, requests, remarks, or other inputs to ELI ERIC in connection with earlier communications related to the experimental proposal.

Scope of the processed personal data: Contact details and identification information of the Data Subjects.

Legal basis for the processing: The legitimate interest of the Controller (to enable communication with Data Subjects as members of the scientific community) in accordance with Article 6(1)(f) of the GDPR. The result of the balancing test may be requested in writing submitted from the DPO of ELI ERIC.

V. Processing Necessary for Statistical and Analytical Purposes

ELI ERIC needs to collect, analyse and statistically organize personal data of Users, which, in aggregated form, serve as a basis for managerial decisions in relations to ELI User Calls and user access to ELI facilities. Such data may also be used for presentations for ELI ERIC employees, the general public, or public authorities. Personal data will always be presented in aggregated form and anonymized form, i.e. no individual will be identified based on such data.

Purpose of the processing: ELI ERIC processes personal data for statistical and analytical purposes in order to enable managerial decisions based on relevant data from the Data Subjects and to prepare presentations containing aggregated and anonymized personal information.

Scope of the processed personal data: Name, surname, age, gender, job position, affiliation, and possible other personal data that can be collected from the Data Subjects' project applications.

Legal basis of the processing: Consent given by the Data Subject in accordance with Article 6(1)(a) of the GDPR. ELI ERIC also has a legitimate interest to processing such data in accordance with Article 6(1)(f) of the GDPR. In this context, the legitimate interest consists of the need to support managerial decision-making related to the User Calls and user access based on relevant data from the Data Subjects. In the case of presentations, the legitimate interest is to inform ELI ERIC employees, the general public or public authorities about ELI ERIC's activities, mission, achievements, etc.

Categories of recipients: By submitting their personal data, Data Subjects acknowledge that ELI ERIC may engage third parties to process and analyse personal data and to create aggregated statistical and analytical outputs as described above. Any such processing shall be carried out in accordance with the relevant provisions of the GDPR and on the basis of a written agreement. Recipients (processors) of such personal data may include professionals operating in the given field including legal entities or natural persons holding the appropriate business authorizations.

VI. Ensuring Compliance with Legal and Regulatory Obligations

ELI and the Controllers may process certain personal data of Users to comply with applicable legal and regulatory obligations, including obligations relating to international sanctions, and restrictions arising from embargo regimes.

Purpose of the processing: Ensuring compliance with applicable EU and national laws relating to sanctions, and other regulatory restrictions that may affect access to ELI facilities, participation in experiments, or the transfer of scientific knowledge and technology.

Scope of the processed personal data: Name, surname, citizenship, affiliation, country of affiliation, date of birth, and other identification data where necessary.

Legal basis of the processing: Processing is necessary for compliance with a legal obligation to which the Controller is subject in accordance with Article 6(1)(c) of the GDPR and, where applicable, for the legitimate interests of the Controller in ensuring regulatory compliance and protecting the security of ELI facilities in accordance with Article 6(1)(f) of the GDPR.

Personal data may be checked against publicly available sanctions or restricted party lists where required by law.

VII. Communication with Users and Mailing Lists

ELI ERIC may use the contact details provided by Users during registration in the User Portal or during the submission and evaluation of Experimental Proposals to communicate with them regarding matters related to ELI ERIC activities.

Such communications may include, in particular:

- Information about User Calls and proposal procedures,
- Updates regarding the User Portal,
- Information necessary for the preparation and performance of experiments,
- Administrative or organizational information concerning access to ELI facilities,
- Other relevant communications addressed to members of the ELI user community.

These communications are necessary to ensure the proper functioning of the User Portal and the organization of User Calls.

Purpose of the processing: Maintaining communication with registered Users regarding ELI ERIC activities and User Calls.

Scope of the processed personal data: Name, surname and e-mail address.

Legal basis of the processing: The legitimate interest of the Controller in maintaining communication with members of the scientific user community and ensuring the proper functioning of the User Portal and the User Call procedures in accordance with Article 6(1)(f) of the GDPR. The results of the balancing test may be requested from the DPO of ELI ERIC. Users may object to receiving such communications at any time by contacting the Controller or by using the unsubscribe option provided in the communication.

Enforcement of the Rights of Data Subjects

General Rules

ELI ERIC would like to inform the Data Subjects that they are entitled to exercise certain rights (set out in Chapter III. of the GDPR) in relation to their personal data processed by ELI ERIC as Controller. These rights may be exercised by submitting an e-mail to the following address: **dpo[@]eli-laser.eu** or by sending a written request via post to the following address: Za Radnicí 835; Dolní Břežany, 252 41, Czech Republic.

ELI ERIC will be able to process such requests within the timeframes indicated below only if the Data Subjects properly identify themselves when exercising their data protection rights. If the Data subjects do not identify themselves properly, ELI ERIC may refuse to act on such requests.

ELI ERIC responds to the requests related to the processing of the personal data of the Data Subjects in writing without undue delay and, in any event, within 1 month of receipt of the request. This timeframe may be extended by an additional 2 months (for a total of 3 months), should such requests prove to be particularly complex. In this case, ELI ERIC will inform the Data Subjects about the extension of the timeframe.

Where the Data Subject makes the request by electronic means, the information shall be provided by electronic means where possible, unless otherwise requested by the Data Subject. When requested by the Data subjects, the information may be provided orally, provided that the identity of the Data Subjects is proven by other means.

As a general rule, ELI ERIC provides information free of charge. Where requests from a Data subject are manifestly unfounded or excessive, in particular, because of their repetitive character, ELI ERIC may either:

- (a) charge a reasonable fee considering the administrative costs of providing the information or communication or taking the action requested; or
- (b) refuse to act on the request.

Certain Rights of Data Subjects

Right to Information:

Data Subjects are entitled to request information on the processing of their personal data. The respond shall cover the information specified in Article 15 (1) of the GDPR, insofar as such information cannot be refused by law. The Controller shall take appropriate measures to provide the Data Subject with all information concerning the processing of personal data referred to in Articles 13 and 14 of the GDPR and notification in accordance with Articles 15 to 22 and Article 34 of the GDPR shall be provided in a concise, transparent, comprehensible and easily accessible form, in a clear and comprehensible manner.

The notification is, in principle, free of charge, and the Controller may charge a fee only in the case specified in Article 12(5)(a) of the GDPR.

The Controller shall reject the request for information only for the reasons specified in Article 12 (5)(b) of the GDPR, and this may only be made in writing, with due justification and provision of appropriate information.

Right to Correction and Deletion (right to be forgotten):

Inaccurate personal data shall be corrected by the Controller. The Controller shall also take steps to delete personal data if the conditions set out in Article 17 of the GDPR are met.

Data Subjects shall have the right to request the deletion of the personal data concerning them without undue delay and the Controller shall comply with such requests, in particular if one of the following applies:

- Personal data are no longer necessary for the purpose for which they were collected or otherwise processed
- Data Subject withdraws consent and there is no other legal basis for the processing
- Data Subject objects to the processing and there is no overriding legitimate reason for the processing or the objection concerns processing for the direct acquisition of business
- Personal data have been processed unlawfully
- Personal data were collected in connection with the provision of information society services to children under the age of 16.

Right to Object to Processing:

Data Subjects are entitled to object to the processing of their personal data at any time by submitting a request to the Controller. Upon such objection, the Controller shall no longer process the personal data unless it can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subjects or if the processing is necessary for the establishment, exercise or defence of legal claims in accordance with Article 21 of the GDPR.

Right to Restrict the Processing:

In accordance with Article 18 of the GDPR, Data Subjects have the right to request that the Controller restrict the processing of their personal data in the following cases:

- Data Subject disputes the accuracy of the personal data (in which case the restriction applies during the period necessary for the Controller to verify the accuracy)
- The processing is unlawful and the Data Subject opposes the deletion of the data, requesting instead that its use be restricted
- The Controller no longer needs personal data for the purpose of the processing, but the Data Subject requires the data in order to submit, enforce or protect legal claims.

Restriction of processing means that the Controller does not process the personal data affected by the restriction, except:

- For storage,
- With the consent of the Data Subject; or
- In the absence of such consent, to extend necessary to protect the rights of another natural or legal person or in the overriding public interest of the Union or of a Member State of the European Union.

The Right to Data Portability:

Data Subjects are entitled to receive the personal data that the Controller processes concerning them in a structured, commonly used, and machine-readable format. Furthermore, Data Subjects have the right to request these personal data be transmitted directly to another Controller where technically feasible, unless such transmission is not technically possible.

Automated Decision-Making in Individual Cases, Including Profiling:

Automated decision-making does not occur during the Controller's data processing activities described in this Notice.

Right to Compensation for Damage Caused by Unlawful Data Processing:

The Controller shall compensate Data Subjects for damage caused by unlawful processing of their personal data or by the breach of data security requirements. This includes damages resulting from a personal data breach by the Controller.

The Controller is exempt from liability if it can demonstrate that the damage or violation of the Data Subject's rights was caused by an unavoidable event outside the scope of processing. Similarly, no compensation is due if the damage was caused by the intentional or grossly negligent conduct of the Data Subject.

Right to Legal Remedy:

Data Subjects may exercise their rights or submit complaints:

- Directly to the Controller: **dpo[@]eli-laser.eu**
- **To the Czech Data Protection Authority** (Office for Personal Data Protection: posta[@]uoou.cz; Pplk. Sochora 27, 170 00 Praha 7, Czech Republic)
- To the European Data Protection Board: **EDPB-DPO[@]edpb.europa.eu.**

According to Article 79 of the GDPR proceedings against the Controller shall be brought before the courts of the Member State where the Controller has an establishment. Alternatively, proceedings may be brought before the courts of the Member State where the Data Subject has his or her habitual residence, unless the Controller is a public authority of a Member State acting in the exercise of its public powers.