



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

**This privacy statement provides information about
the processing and the protection of your personal data.**

Processing operation: EUROPE DIRECT NETWORK (European Documentation Centres)

Data Controller: Directorate-General for Communication, Directorate C, Unit C.4.

Record reference: DPR-EC.01062.1

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1. Introduction

The European Commission (hereafter 'the Commission') is committed to protecting your personal data and to respecting your privacy. The Commission collects and further processes personal data pursuant to [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 (repealing Regulation (EC) No 45/2001).

This privacy statement explains the reasons for the processing of your personal data, the way we collect, handle and ensure protection of all personal data provided, how that information is used and what rights you have in relation to your personal data. It also specifies the contact details of the responsible Data Controller with whom you may exercise your rights, the Data Protection Officer, and the European Data Protection Supervisor.

This privacy statement concerns the processing of personal data by the Commission when managing the network of European Documentation Centres (EDC), administered by the Directorate-General for Communication, Unit C.4. (the horizontal Data Controller on behalf of the Commission) and by the units responsible for dealing with processing activities related to the Europe Direct and the network of European Documentation Centres itself in the competent Commission department or service.

2. Why and how do we process your personal data?

The purpose of the processing operation is to facilitate the operation and management of activities related to the network of European Documentation Centres ([EDC](#)).

More specifically, the processing of personal data is necessary for:

- the operation and management of the EDC network and selection of its members
- communication activities such as exchange of correspondence, sending invitations and notifications and follow-up (this entails the management of contact lists for correspondence), maintenance of the EUROPA website and the promotion of the EDC network and its activities
- the operation and management of the EUROPE DIRECT IT tool
- the organisation of training events, annual general meetings, performing studies/evaluations
- information provision, requests for information and calls for action
- security and control of access to the Commission premises
- performing evaluations.

The EDC is one of the Commission's [EUROPE DIRECT](#) communication networks managed by the Commission Representations at national level. EDC are located in higher education institutions or research centres and they are bound to the Commission by an agreement, signed by their host structure and the Head of the Commission Representation in the respective country. EDC help the broad audience and the academic community to access official EU publications and documents (online and print) find detailed information on European law, integration, policies and institutions train students for EU-related fact-finding and research.

The Europe Direct IT tool (standard EU login required, [DPO-839-4](#)) is used for storing contact lists and personal data about the EDC members.

Your personal data is collected in order to ensure that the network operates and carries out its functions in compliance with the contractual obligations established between Directorate-General for Communication and EDC.

Your personal data will not be used for automated decision-making including profiling.

3. On what legal ground(s) do we process your personal data?

We process your personal data, because:

- 1) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Union institution or body (Article 5(1)(a) of Regulation (EU) 2018/1725).

The processing operations of personal data linked to EDC is necessary for the management and functioning of the Commission, as mandated by the Treaties, and more specifically Article 5 of TEU, Article 13 TEU and Articles 244-250 TFEU, and in accordance with Article 1 and Article 11 of TEU.

Supporting communication activities of the EUROPE DIRECT network is a task resulting from the Commission's prerogatives at institutional level, as provided for in Article 58(2) of Regulation (EU, Euratom) 2018/1046 of the European Parliament and of the Council of 18 July 2018 on the financial rules applicable to the general budget of the Union, amending Regulations (EU) No 1296/2013, (EU) No 1301/2013, (EU) No 1303/2013, (EU) No 1304/2013, (EU) No 1309/2013, (EU) No 1316/2013, (EU) No 223/2014, (EU) No 283/2014, and Decision No 541/2014/EU and repealing Regulation (EU, Euratom) No 966/2012 (OJ L 193, 30.7.2018, p. 1).

- 2) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 5(1)(c) of Regulation (EU) 2018/1725).

Processing is necessary for the purpose of performing obligations set out in the agreements between the EDC and the Commission.

4. Which personal data do we collect and further process?

In order to carry out this processing operation the Data Controller may collect the following categories of personal data:

- Personal data of EDC network members: name and surname, contact details (e-mail, phone number postal address), EDC academic establishment
- Contact information of EDC managers available online: name, surname, e-mail, EDC academic establishment
- Personal data available via audiovisual content (e.g. photographs/pictures, photo shoots, presentations etc.) that might be available on the internet/intranet in the context of the meetings and in the framework of Commission activities: audio and visual recording of the meetings

- The categories of data processed by the EU Login application are described in the respective notification of DIGIT ([DPO-839-4](#))
- The categories of data processed for security purposes to access Commission premises are described in the respective record of DG HR.DS ([DPR-EC-00655.1](#))

The Data Controller may share aggregate or de-identified information with other Commission Directorates and/or other EU institutions or third parties for scientific research or statistical purposes.

5. How long do we keep your personal data?

The Data Controller only keeps your personal data for the time necessary to fulfil the purpose of collection or further processing.

5.1. Personal data of EDC network members

Personal data necessary for the management of the EDC network members (including the management of contact lists for correspondence) is stored in the EUROPE DIRECT IT tool for the duration of the agreement between the EDC and the Commission and for a maximum period of three (3) years afterwards.

If an individual EDC network member ceases to be a member of the EUROPE DIRECT network, COMM.C.4 and the respective Representation will take reasonable steps to remove the EDC network member from the tool without undue delay and within one (1) month after notification.

5.2. Contact information of EDC managers available online

Contact information of EDC network members will be kept online for the duration of the agreement with each EDC and then stored for a period of three (3) years thereafter to analyse the data for current and future operations and for information purposes.

5.3. Personal data available via audio visual content

Audiovisual content may be permanently archived according to the provisions of the Common Commission Level Retention List (SEC(2019)900/2), for historical purposes to document, preserve and make available the history and audiovisual heritage of the European Commission and the European Union.

5.4. Reports, paper and electronic records, including Ares records kept by Directorate-General for Communication

All paper and electronic records concerning the day-to-day correspondence, calls for proposals and/or interest together with the resulting contractual/financial files as well as reports containing aggregated data will be archived according to the Common Commission Level Retention List (SEC(2019)900/2) and stored in ARES (Advanced Records System) under the responsibility of Secretariat-General (see Notification DPO-1530.4) for a period of ten (10) years with the application of sampling and selection techniques.

6. How do we protect and safeguard your personal data?

All personal data in electronic format (e-mails, documents, databases, uploaded batches of data, etc.) are stored on the servers of the Commission. All processing operations 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 Commission's contractors are bound by a specific contractual clause for any processing operations of personal data on behalf of the Commission, and by the confidentiality obligations deriving from 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 (GDPR).

In order to protect your personal data, the Commission has put in place a number of technical and organisational measures. Technical measures include 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. Organisational measures include restricting access to personal data solely to authorised persons with a legitimate need to know for the purposes of this processing operation.

7. Who has access to your personal data and to whom is it disclosed?

Access to your personal data is provided to the authorised personnel of the EU institutions and its contractors responsible for carrying out this processing operation according to the "need to know" principle. Such staff abide by statutory, and when required, additional confidentiality agreements.

Authorised staff of Directorate-General for Communication and Commission Representations have access to the data stored on the EUROPE DIRECT IT tool, mailing lists, paper and electronic files containing information related to day-to-day correspondence, calls for proposals and/or interest leading to the selection of EDCs together with the resulting contractual/financial files. It is important to note however, that the data is accessible only on a 'need-to-know' basis. While staff of COMM.C.4 and COMM.D.4 can access and manage the data of all national networks, the Commission Representation in charge of EUROPE DIRECT can only access and manage the data of their own national network.

External processors under a framework contract may be provided with mailing lists and/or draw up their own mailing lists and create their own paper/electronic records based on contacts with the members for the purposes of organising training events, performing studies/evaluations and collecting information. The external companies may also access the mailing list in order to contact the EDC to organise their travel and accommodation as well as collect information.

Security services may collect and handle EDC personal data for the purposes of training events held at the premises of the EU institutions. Security services should be interpreted as services contracted by the EU institutions, including European Commission Representations.

Contact information of the EDC managers is available to everyone via the [EUROPA](#) website.

8. What are your rights and how can you exercise them?

You have specific rights as a 'data subject' under Chapter III (Articles 14-25) of Regulation (EU) 2018/1725. As regards this processing operation, you can exercise the following rights:

- the right to access your personal data (Article 17 of Regulation (EU) 2018/1725);
- the right to rectification in the case that your personal data is inaccurate or incomplete (Article 18 of Regulation (EU) 2018/1725);
- the right to erasure of your personal data (Article 19 of Regulation (EU) 2018/1725);
- where applicable, the right to restrict the processing of your personal data (Article 20 of Regulation (EU) 2018/1725);
- the right to data portability (Article 22 of Regulation (EU) 2018/1725);
- and the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a).

If EDC details change, or an EDC network member believes that Directorate-General for Communication is processing inaccurate information, the member should request that his/her information be amended by the EC Representation in their country via the EUROPE DIRECT IT tool.

You have consented to provide your personal data to the Directorate-General for Communication, Directorate C, Unit C.4. for the present processing operation. You can withdraw your consent at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent.

You can exercise your rights by contacting the Data Controller, or in case of conflict the Data Protection Officer. If necessary, you can also address the European Data Protection Supervisor. Their contact information is given under Section 9.

Where you wish to exercise your rights in the context of one or several specific processing operations, please provide their description (i.e. Record reference(s) as specified under Section 10) in your request.

9. Contact information

The Data Controller

If you would like to exercise your rights under Regulation (EU) 2018/1725, or if you have comments, questions or concerns, or if you would like to submit a complaint regarding the collection and use of your personal data, please feel free to contact the Data Controller, Directorate-General for Communication, Unit C.4 (COMM-C4@ec.europa.eu)

The Data Protection Officer (DPO) of the Commission

You may contact the Data Protection Officer (DATA-PROTECTION-OFFICER@ec.europa.eu) with regard to issues related to the processing of your personal data under Regulation (EU) 2018/1725.

The European Data Protection Supervisor (EDPS)

You have the right to have recourse (i.e. you can lodge a complaint) to the European Data Protection Supervisor (edps@edps.europa.eu) if you consider that your rights under Regulation (EU) 2018/1725 have been infringed as a result of the processing of your personal data by the Data Controller.

10. Where to find more detailed information?

The Commission Data Protection Officer (DPO) publishes the register of all processing operations on personal data by the Commission, which have been documented and notified to him. You may access the register via the following link: <http://ec.europa.eu/dpo-register>.

This specific processing operation has been included in the DPO's public register with the following Record reference: **DPR-EC-01062.1**