



EUROPEAN COMMISSION

PROTECTION OF YOUR PERSONAL DATA

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

Processing operation: Processing of personal data linked to meetings and events

Data Controller: European Commission

Record reference: DPR-EC-01063

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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 meetings and events of the European Commission Representation in Poland.

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

The purpose of the processing is to ensure the proper organisation, operation and management of meetings, workshops, seminars, away days and other similar events for the general public, media or various stakeholders, including Info/Open days, Citizens' dialogues, seminars, etc. (hereafter 'meetings or events'), organised or co-organised by the Representation. Personal data is collected to ensure the dissemination of information to the media, citizens and stakeholders about the activities of the Commission and the objectives and goals of its policies and actions.

Specifically, personal data may be collected for the following purposes:

- meetings or events;
- sending e-mails/letters (including invitations) by manual, electronic/automated means;
- publishing and sharing participants/attendance lists;
- processing opt-ins (explicit consents, e.g. participation at event, subscription to a newsletter) collected through online registration forms (see also point 3);
- collecting and managing lists/ mailing lists for meetings or events.
- collecting and managing personal data related to security and control of access to the Commission/Representation/external location premises;
- publishing minutes, reports, notices, proceedings, news, newsletters, photographs, (live) web-streaming and/or audio and video recording of speakers and participants, presentations of speakers, including on internet/intranet, in the context of events organised by the Representation;
- collecting and managing lists and mailing lists for meetings, news and publications.

Live web-streaming and audio-visual recording at the meeting/event of the speakers, organisers and participants, as well as photographs of the speakers and panoramic photographs of participants and organisers will be taken and published in the context of the meeting/event at a site or place indicated in the specific privacy statement linked to the event.

The audience or non-speaker participants are not photographed individually or in groups. They may however appear on panoramic photographs of the whole event/audience.

Participants who do not wish to be part of the above web-streaming and recording/publishing activities have the possibility to object to processing.

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 the Regulation 2018/1725).

Processing is necessary for the performance of the European Commission's tasks carried out in the public interest, as foreseen in Article 11 and Article 13 of the Treaty on European Union and in Article 15 of the Treaty on the Functioning of the European Union.

The processing operations of personal data linked to communication of the European Commission Representations, Citizens' Dialogues and 'Partnership' actions is a task resulting from the Commission's own prerogatives at institutional level, as provided for in Article 58 (2) (d) of Regulation (EC, Euratom) 2018/1046 of 18 July 2018 on the financial rules applicable to the general budget of the Union (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 fulfilling contractual obligations stemming from agreements between the European Commission Representations and its event partners.

- 3) you have given consent to the processing of your personal data for one or more specific purposes (Article 5(1)(d) of Regulation (EU) 2018/1725)

For specific processing activities, the consent of the data subject is necessary. In compliance with Article 3(15) and Article 7 of Regulation (EU) 2018/1725, the consent must be freely given, specific, informed and unambiguous and it may be expressed by an email, submitted through an e-registration form, or in any other written form.

Your consent is required for the following actions during the meeting/event (if applicable):

- the processing of your personal data relating to your dietary requirements and/or access requirements;
- the sharing of the meeting/event participants list containing your name and affiliation with other participants. In addition, further information will be given if there are specific purposes for such sharing (e.g. for the purpose of future collaboration);

- the sharing of the meeting/event attendee list containing your name and affiliation among participants, in order to create working groups to continue the collaborative work launched during the meeting/event;
- the processing of your personal data for inviting you to future events the data controller may organise;
- the processing of your personal data for managing your subscription to a newsletter of the data controller;
- the processing of your consent for taking photographs, making live web-streaming and/or audio and video recordings of speakers and participants at meeting/event.

If you opt in, you are giving us your explicit consent under Article 5(1)(d) of Regulation (EU) 2018/1725 to process your personal data for those specific purposes. You can give your consent via a clear affirmative act by ticking the box(es) on the online registration form.

We have obtained your consent directly from you via email, or a sign-up form that is distributed during a meeting, or through an opt-in option that is provided for in the online registration form. Your consent for these services can be withdrawn at any time and detailed information on how to withdraw consent will be contained in the privacy statement linked to the specific meeting/event.

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:

- Identification data: first/last name, gender (for the correct title), function/title, name of organisation, postal address, city/zip code, country, e-mail, phone/mobile numbers, areas) ; nationality, date of birth, passport or identity card number and its date of issue and expiry (for accessing the premises where the meeting/event is held); online identifiers (device ID, IP address and/or cookie identifier);
- professional background: function/title, name of organisation, areas of expertise, fields of interest;
- financial information (such as a payment card number or bank account) may be collected for the payment of fees of the meeting/event or for possible reimbursements;
- dietary requests (if any) or specific access requirements and/or requests for physical assistance;
- 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 European Commission activities (only with the explicit permission of each participant): voice recordings, video recordings, or an image of a data subject.

The Data Controller may share aggregate or de-identified information with other Commission Directorates and/or other EU institutions or third parties for archiving 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 related to the organisation and management of the meeting/event.

Personal data provided during the registration, before, during or after the event will be stored for five (5) years after the meeting/event. All paper and electronic records concerning the day-to-day correspondence and reports containing aggregated data including ARES records are kept for a period of ten (10) years according to the Common Commission Level Retention List (SEC(2019)900/2). They will be archived according to the Commission's legal framework and stored in ARES (Advanced Records System) under the responsibility of the Secretariat-General (DPO-1530.4).

5.2 The retention period for the purpose of security and access to the Commission premises is governed by the record on the Commission Physical Access Control System (DPR-EC-00655.1). Data is retained until the termination of the link between the individual and the Commission plus six (6) months and will vary based on the type of link (e.g. a visitor's data will be retained until the end of the visit plus six (6) months).

5.3 Personal data relating to dietary and/or access requirements will be deleted as soon as they are no longer necessary for the purpose for which they have been collected in the framework of the meeting/event, but no later than one (1) month after the end of the meeting/event.

5.4 Personal data available via audiovisual content.

Audiovisual material collected in the course of the meeting/event, will be kept for three (3) months after the meeting/event before being deleted. (See: DPR-EC-01937 Audio-visual recording of meetings).

Recordings from the web-streamed meeting/event will be kept for two (2) years before being deleted. (See DPR-EC-00306 -Web-streaming of Commission events).

Selected audiovisual content may be archived for permanent preservation, in line with the provisions of the Common Commission Level Retention List (SEC(2019)900/2), for historical purposes to document, preserve and make the history and audiovisual heritage of the European Commission and the European Union publicly available.

5.5 Personal data shared with the controller for future mailing purposes (e.g., for receiving newsletters or invitations to similar events) are processed in line with the Record of Processing DPR-EC-03928 (Management of subscriptions to receive information) and the specific privacy statement prepared by the organising Commission service.

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 the 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 the Commission have access to the personal data provided by participants for the registration to the event, lists of participants, mailing lists, paper files and electronic files containing information related to day-to-day correspondence. The data is necessary for the organisation and management of meetings and follow-up activities.

Authorised staff of the Commission processors and external contractors may be provided with the data relevant for them to provide the required logistical and organisational support. That may include mailing lists and/or drawing up their own mailing lists, and creation of their own paper/electronic records based on contacts with the panel members for the purposes of organising meetings. For meetings that include or are managed by external contractors, there may be exchanges of information with participants in order to arrange travel and accommodation and possible dietary requirements.

Security services may collect and handle personal data of the participants for security purposes, prior to events held at the premises of the EU institutions. Security services should be interpreted as services contracted by the EU institutions.

7.1 Cookies

Cookies are short text files stored on a user’s device (such as a computer, tablet or phone) by a website. Cookies are used for the technical functioning of a website (functional cookies) or for gathering statistics (analytical cookies).

If registration for the meeting/event takes place via a Commission website, the cookies employed by the Commission on the registrant’s device for that purpose will be covered by the cookie policy of the Commission, which is available here: https://ec.europa.eu/info/cookies_en.

When you visit the website(s) of the meeting/event and when you register, we will indicate in the specific privacy statement how long we will keep the browser history of your visit. This information will then be deleted. The collection, aggregation and anonymising

operations are performed in the data centre of the European Commission under adequate security measures.

Cookies are stored by Europa Analytics, the corporate service which measures the effectiveness and efficiency of the European Commission's websites on EUROPA. More information is available in the Record of Processing DPR-EC-00685 (Europa Analytics).

Enabling these cookies is not strictly necessary for the website to work but it will provide you with a better browsing experience. You can delete or block these cookies, but if you do that, some features of the meeting/event website may not work as intended.

The cookie-related information is not used to identify data subjects personally and the pattern data is fully under the Commission's control. These cookies are not used for any purpose other than those described here.

Should you wish to opt your personal data out of our anonymised, aggregated statistics, you can do so on our cookies page. In particular, you can control and/or delete those cookies as you wish.

7.2. Third party IT tools, including Social Media

We may use third party IT tools to inform about and promote the meeting/event through widely used communication channels, including the social media. For detailed information about the use of social media by the European Commission, see the Record of Processing DPR-EC-00073 (Social Media Use by the European Commission).

You may be able to watch our videos, which may be also uploaded to one of our social media pages and follow links from our website to other relevant social media.

In order to protect your privacy, our use of third party IT tools to connect to those services does not set cookies when our website pages are loaded on your computer (or other devices), nor are you immediately redirected to those social media or other websites. Only in the event that you click on a button or "play" on a video to watch it, a cookie of the social media company concerned will be installed on your device. If you do not click on any social media buttons or videos, no cookies will be installed on your device by third parties.

In order to view such third-party content on our websites, a message will alert you that you need to accept those third parties' specific Terms and Conditions, including their cookie policies, over which the Commission has no control.

We recommend that users carefully read the relevant privacy policies of the social media tools used. These explain each company's policy of personal data collection and further processing, their use of data, users' rights and the ways in which users can protect their privacy when using those services.

The use of a third party IT tool does not in any way imply that the European Commission endorses them or their privacy policies. In the event that one or more third party IT tools are occasionally unavailable, we accept no responsibility for lack of service due to their downtime.

7.3. International transfers

The European Commission may transfer your personal data to the recipients in a third country or to an international organisation in accordance with Regulation (EU) 2018/1725.

The legal basis for the transfer of your personal data should be specified in the specific privacy statement and could be one of the following:

- 1) adequacy decision of the Commission for a specific country / commercial sector (Article 47 of Regulation (EU) 2018/1725);
- 2) appropriate safeguards (Article 48 of Regulation (EU) 2018/1725), if there is no adequacy decision for the respective third countries / commercial sectors. The specific privacy statement will provide (1) reference to the appropriate safeguards, and (2) the means by which a data subject can obtain a copy of them / or indicate where they have been made available;
- 3) derogation(s) for specific situation(s), if there is no adequacy decision for the respective third countries / commercial sectors, and no appropriate safeguards for transfer.

Please note that pursuant to Article 3(13) of Regulation (EU) 2018/1725 public authorities (e.g. Court of Auditors, EU Court of Justice) which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients. The further processing of those data by those public authorities shall be in compliance with the applicable data protection rules according to the purposes of the processing.

The information we collect will not be given to any third party, except to the extent and for the purpose we may be required to do so by law.

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);
- the right to object to the processing of your personal data, which is lawfully carried out pursuant to Article 5(1)(a) of Regulation (EU) 2018/1725 on grounds relating to your particular situation.

If you have provided your consent for the present processing operation, you can withdraw it at any time by notifying the Data Controller. The withdrawal will not affect the lawfulness of the processing carried out before you have withdrawn 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 European Commission Representation in Poland at the following functional e-mail address: COMM-REP-PL-DATAPROTECTION@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-01063**